

**ITEM 6**

**PROPOSED STATEWIDE COST ESTIMATE**

**\$2,496,463 - \$5,294,316<sup>1</sup>**

**(For the Initial Claiming Period of 2016-2017, 2017-2018, and 2018-2019)**

**(Estimated Annual Costs for Fiscal Year 2019-2020 and Following Is**

**\$323,993 - \$1,992,536**

**Plus a .48 Percent Annual Growth Rate and the Implicit Price Deflator)<sup>2</sup>**

Penal Code Section 13515.28; Statutes 2015, Chapter 469 (SB 29)

*Peace Officer Training: Mental Health/Crisis Intervention*

17-TC-06

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The Commission on State Mandates (Commission) adopted this Statewide Cost Estimate by a vote of [vote count will be included in the adopted Statewide Cost Estimate] during a regularly scheduled hearing on July 24, 2020 as follows

<b>Member</b>	<b>Vote</b>
Lee Adams, County Supervisor	
Mark Hariri, Representative of the State Treasurer, Vice Chairperson	
Jeannie Lee, Representative of the Director of the Office of Planning and Research	
Gayle Miller, Representative of the Director of the Department of Finance, Chairperson	
Sarah Olsen, Public Member	
Carmen Ramirez, City Council Member	
Jacqueline Wong-Hernandez, Representative of the State Controller	

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<sup>1</sup> The high end of this range projects potential late claims that may be filed until April 20, 2021 less a 10 percent late filing penalty.

<sup>2</sup> It is assumed that the low end of this range more likely represents the actual State liability for this program based on historic claiming patterns. The high end is the maximum possible cost if all agencies filed claims for all costs of all FTOs trained, which for a number of reasons described below is highly unlikely.

## STAFF ANALYSIS

### Background and Summary of the Mandate

This Statewide Cost Estimate (SCE) addresses the State’s subvention costs for the mandated activities arising from Penal Code section 13515.28, added by Statutes 2015, chapter 469 (test claim statute). The Commission found that the test claim statute imposes a reimbursable state-mandated program within the meaning of article XIII B, section 6 of the California Constitution and Government Code section 17514, on cities, counties, and those police protection districts *that wholly supplant the law enforcement functions of the county within their jurisdiction* pursuant to Government Code section 53060.7, that are required to have a Field Training Program under California Code of Regulations, title 11, section 1004, and have appointed or assigned Field Training Officers (FTOs) for that program,<sup>3</sup> with reimbursable activities as specified in the Decision and Parameters and Guidelines.<sup>4</sup> Generally, the test claim statute requires these agencies to ensure that each FTO assigned or appointed shall attend a one-time, eight-hour training on crisis intervention and behavioral health and exempts FTOs who have already received the training in the prior 24 months from the requirement.<sup>5</sup> The training is to take place either before June 30, 2017 for FTOs appointed before January 1, 2017, or within 180 days of being assigned or appointed as an FTO for FTOs appointed thereafter.<sup>6</sup>

The Decision and Parameters and Guidelines for claiming for costs incurred beginning July 1, 2016, were adopted on September 27, 2019.<sup>7</sup>

The State Controller’s Office (Controller) issued claiming instructions on December 18, 2019.<sup>8</sup> Eligible claimants were required to file initial reimbursement claims with the Controller for costs incurred for fiscal years 2016-2017, 2017-2018, and 2018-2019 by April 28, 2020.<sup>9</sup> Late initial reimbursement claims may be filed until April 28, 2021, but will incur a 10 percent late filing penalty of the total amount of the initial claim without limitation.<sup>10</sup> Annual reimbursement claims for subsequent fiscal years, starting with 2019-2020 fiscal year, must be filed with the

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<sup>3</sup> California Code of Regulations, title 11, section 1004(a), states that “[a]ny department which employs peace officers and/or Level 1 Reserve peace officers shall have a POST-approved Field Training Program.” Section 1004(b) states that a department that does not provide general law enforcement uniformed patrol services, or hires only lateral entry officers possessing a POST basic certificate and who have completed a similar POST approved Field Training Program may request an exemption and not comply with this requirement.

<sup>4</sup> Exhibit A, Decision and Parameters and Guidelines.

<sup>5</sup> Penal Code section 13515.28, Statutes 2015, chapter 469.

<sup>6</sup> Penal Code section 13515.28, Statutes 2015, chapter 469.

<sup>7</sup> Exhibit A, Decision and Parameters and Guidelines, page 3.

<sup>8</sup> Exhibit C, Controller’s Claiming Instructions Program No. 373, page 1.

<sup>9</sup> Exhibit C, Controller’s Claiming Instructions Program No. 373, page 1; Government Code section 17561(d)(1)(A).

<sup>10</sup> Government Code section 17561(d)(3).

Controller by February 15 following the fiscal year in which costs were incurred.<sup>11</sup> Claims filed more than one year after the deadline will not be accepted, and late claims filed within one year of the deadline will incur a 10 percent late filing penalty not to exceed \$10,000.<sup>12</sup>

During the test claim process, the claimants filed evidence regarding their alleged increased costs to implement the mandate. The City of Claremont filed evidence showing it incurred actual increased costs, minus offsetting grant funds, of \$2,981 in fiscal year 2016-2017 as required by the test claim statute for “...remaining unreimbursed benefit and indirect costs...”<sup>13</sup> This claimant indicated that it did not expect to incur costs in fiscal year 2017-2018 because “...this 8-hour training is mandated by the Subject Statutes alleged in this Test Claim every 24 months.”<sup>14</sup> This claimant estimated its costs for fiscal year 2018-2019, at \$5,890, based on the assumption that staff would be required to re-train every 24 months.<sup>15</sup> The City of South Lake Tahoe filed evidence showing it incurred actual increased costs, of \$11,150 in fiscal year 2016-2017 to “send PD staff to receive the training” as required by the test claim statute.<sup>16</sup> This claimant also indicated that it did not expect to incur costs in fiscal year 2017-2018 because “...this 8-hour training is mandated by the Subject Statutes alleged in this Test Claim every 24 months.”<sup>17</sup> This claimant estimated its costs for fiscal year 2018-2019, at \$11,485, based on the assumption that staff would be required to re-train every 24 months.<sup>18</sup> However, as discussed below, the Commission determined in the Test Claim Decision, based on the plain language of the statute, that only a “one-time, eight-hour training” is required per FTO assigned or appointed and only the one-time training per FTO was included in the Parameters and Guidelines.<sup>19</sup>

The claimant also provided a statewide cost estimate (as required by Government Code 17553) of \$2.57 million in initial costs and \$600,000 in ongoing costs based on the analysis from the Senate Public Safety Committee and the Senate Appropriations Committee.<sup>20</sup>

### **Eligible Claimants and Period of Reimbursement**

“Only a city, county, or city and county, or a police protection district *that wholly supplants the law enforcement functions of the county within their jurisdiction* pursuant to Government Code section 53060.7, that are required to have a Field Training Program under California Code of

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<sup>11</sup> Government Code section 17560(a).

<sup>12</sup> Government Code section 17568.

<sup>13</sup> Exhibit B, Test Claim (Declaration of Adam Pirrie), page 24.

<sup>14</sup> Exhibit B, Test Claim (Declaration of Adam Pirrie), page 24.

<sup>15</sup> Exhibit B, Test Claim (Declaration of Adam Pirrie), page 24.

<sup>16</sup> Exhibit B, Test Claim (Declaration of Deborah McIntyre), page 20.

<sup>17</sup> Exhibit B, Test Claim (Declaration of Deborah McIntyre), page 20.

<sup>18</sup> Exhibit B, Test Claim (Declaration of Deborah McIntyre), page 20.

<sup>19</sup> Exhibit A, Decision and Parameters and Guidelines, page 8.

<sup>20</sup> Exhibit B, Test Claim (Narrative), page 15 and (Senate Bill Analyses), pages 35-46.

Regulations, title 11, section 1004 and have appointed or assigned FTOs for that program, and that incur increased costs as a result of this mandate are eligible to claim reimbursement.”<sup>21</sup>

Government Code section 17557(e) states that a test claim shall be submitted on or before June 30 following a given fiscal year to establish eligibility for reimbursement for that fiscal year. The claimant filed the Test Claim on May 10, 2018 establishing eligibility for reimbursement beginning in the 2016-2017 fiscal year. Therefore, costs incurred on or after July 1, 2016 are reimbursable.

### **Reimbursable Activities**

The Parameters and Guidelines authorize reimbursement as follows:<sup>22</sup>

- A. Ensure that each FTO assigned or appointed prior to January 1, 2017 shall attend a one-time, eight-hour training on crisis intervention and behavioral health before June 30, 2017. (Penal Code § 13515.28, Stats 2015, ch. 469.)
- B. Ensure that each FTO assigned or appointed after January 1, 2017 shall attend a one-time, eight-hour training on crisis intervention and behavioral health within 180 days of being assigned or appointed as an FTO. (Penal Code §13515.28, Stats 2015, ch. 469.)

FTOs who have completed 40 hours of crisis intervention and behavioral health training; or who have completed eight hours of crisis intervention and behavioral health training in the past 24 months, are *exempt* from these requirements. (Penal Code § 13515.28(a)(2), Stats. 2015, ch. 469.)

***Reimbursement is not required to develop or present the training.***

### **Offsetting Revenues and Reimbursements.**

The Parameters and Guidelines provide the following:<sup>23</sup>

Any offsetting revenue 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, service fees collected, federal funds, state funds, and any other funds that are not the claimant’s proceeds of taxes, shall be identified and deducted from this claim.

Training standards and rules for peace officers that are outlined in Penal Code sections 13510 et seq. (which includes section 13515.28) “shall apply to those cities, counties, cities and counties, and districts receiving state aid pursuant to this chapter . . . .”<sup>24</sup> Participating agencies agree to abide by the standards established by POST and may apply to POST for state aid.<sup>25</sup> Any such aid

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<sup>21</sup> Decision and Parameters and Guidelines, page 7.

<sup>22</sup> Exhibit A, Decision and Parameters and Guidelines, page 8.

<sup>23</sup> Exhibit A, Decision and Parameters and Guidelines, pages 10-11.

<sup>24</sup> Penal Code section 13510(a).

<sup>25</sup> Penal Code sections 13522 and 13523.

received for training FTO officers consistent with this program must be identified as offsetting revenue in the claimant's initial or annual reimbursement claim.

### **Statewide Cost Estimate**

Commission staff reviewed the 243 reimbursement claims submitted by 113 cities, 22 counties, zero cities and counties, and zero eligible police protection districts, and data compiled by the Controller.<sup>26</sup> The unaudited reimbursement claims data compiled by activity totals \$1,594,633 for fiscal year 2016-2017, \$528,774 for fiscal year 2017-2018, and \$373,056 for fiscal year 2018-2019 totaling \$2,496,463 for the initial reimbursement period, with the total cost segregated by activity as follows:<sup>27</sup>

\$536,130	Activity 1. (One-time training of FTOs appointed or assigned prior to 1/1/2017)
\$1,075,577	Activity 2. (One-time training of FTOs appointed or assigned after 1/1/2017)
\$656,112	Indirect Costs
\$241,877	Unsegregated Claims
(\$13,233)	Offsetting Revenues or Other Reimbursements
<b>\$2,496,463</b>	<b>Total Costs Claimed</b>

The \$2,496,463 total also includes \$241,877 in costs claimed in seven of the unaudited initial claims, which were not filed by activity as specified in the claiming instructions and were instead unsegregated by activity, indirect costs, offsetting revenues, or other reimbursements. In addition the \$536,130 in costs claimed for activity 1., \$1,075,577 in costs claimed for activity 2., and \$656,112 in costs claimed for indirect costs also includes \$157,807 in costs claimed in 10 of the unaudited initial claims, which did specify the amount claimed by activity, indirect costs, and offsetting revenues or other reimbursements but did not specify the number of FTOs claimed totaling \$399,684.<sup>28</sup> Finally, the total costs claimed excludes \$13,233 in offsetting revenues and other reimbursements indicated by the claimants on their claim forms.<sup>29</sup> In addition, of the claims filed by cities, 37 percent of the total costs were filed by a single jurisdiction, the City of Los Angeles; and of the claims filed by counties, 29 percent of the total costs were also filed by a single jurisdiction, the County of San Bernardino.<sup>30</sup>

#### *Initial Reimbursement Period*

The statewide cost for the initial reimbursement period is estimated to range from \$2,496,463 the total amount of timely filed unaudited claims for fiscal years 2016-2017, 2017-2018, and 2018-2019 to \$5,294,316, the total amount of the estimated costs incurred for this program by all cities, counties, cities and counties (including those that have not filed timely reimbursement

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<sup>26</sup> Exhibit D, Claims data reported as of May 28, 2020.

<sup>27</sup> Exhibit D, Claims data reported as of May 28, 2020.

<sup>28</sup> For purposes of calculating the costs per FTO, claims that did not clearly specify the amount claimed for activity 1., activity 2., and indirect costs (7) or clearly specify the number of FTOs for which costs were claimed (10) were excluded from the tables as specified.

<sup>29</sup> Exhibit D, Claims data reported as of May 28, 2020.

<sup>30</sup> Exhibit D, Claims data reported as of May 28, 2020, pages 2 and 3.

claims), and an unknown number of eligible police protection districts (including those that have not filed timely reimbursement claims) less a 10 percent late filing penalty, based on the assumptions outlined in the analysis, with the range of costs segregated by activity as follows:

\$536,130 – \$536,130	Activity 1. (One-time training of FTOs appointed prior to 1/1/2017) <sup>31</sup>
\$1,075,577 - \$3,441,020	Activity 2. (One-time training of FTOs appointed after 1/1/2017) <sup>32</sup>
\$656,112 - \$1,668,147	Indirect Costs <sup>33</sup>
\$241,877 – (\$0)	Unsegregated Claims <sup>34</sup>
(\$13,233) - (\$13,233)	Offsetting Revenues <sup>35</sup>
\$0 – (\$337,748)	Less 10 Percent Late Filing Penalty <sup>36</sup>
<b>\$2,496,463 - \$5,294,316</b>	<b>Total Costs<sup>37</sup></b>

<sup>31</sup> Based on a review of the claims filed for the initial claiming period, the amount claimed for activity 1., for fiscal year 2016-2017 by Suisun City should be zero but incorrectly specifies the amount actually claimed for activity 2., and the amount claimed for activity 2., incorrectly specifies the amount actually claimed for indirect costs. Zero should be the total for activity 1., \$1,509 should be the total for activity 2., and \$951 should be the total for indirect costs (see Exhibit D, Claims Data as of May 28, 2020, page 6).

<sup>32</sup> The high end of this estimate is calculated based on the total estimated number of FTOs requiring training during the initial reimbursement period (5,253) less the number of FTOs specified for which costs were claimed for the initial reimbursement period (1,875) and less the assumed amount represented in the unsegregated claims and claims that did not specify the number of FTOs (357) trained for the initial reimbursement period  $(5,253 - (1,875 + 357) = 3,021)$  multiplied by the program weighted average cost per FTO of \$1,118. The estimated cost per FTO breaks down to \$783 for activity 2., and \$335 for indirect costs (based on the weighted average of 30%) totaling \$2,365,443 for activity 2., and \$1,012,035 for indirect costs and totaling \$3,441,020 for activity 2.

<sup>33</sup> The upper bound of this estimate assumes a weighted average program percentage of the total amount claimed for indirect costs of 30 percent.

<sup>34</sup> Unsegregated claims are not filed according to the claiming instructions and are subject to audit and reduction by the State Controller. Further unsegregated claims are not anticipated.

<sup>35</sup> The high end of the projected potential costs for the initial reimbursement period makes no assumptions regarding offsetting revenues or reimbursements. See Exhibit A, Decision and Parameters and Guidelines, pages 10-11.

<sup>36</sup> The 10 percent late filing penalty is calculated based on the estimated 3,021 FTOs, for whom costs have not been claimed for the initial claiming period for activity 2., and indirect costs  $(\$2,365,443 + \$1,012,035) \times 10\% = \$337,478$ .

<sup>37</sup> The low end of the total actual costs claimed for activity 1., activity 2., and indirect costs includes \$157,807 claimed in 10 claims that did not specify the number of FTOs. The high end

### *Fiscal Year 2019-2020 and Following*

The statewide estimate for annual state liability for this program for fiscal year 2019-2020 and following is estimated at \$323,993<sup>38</sup> - \$1,992,536, plus the .48 percent growth rate and the implicit price deflator, based on the assumptions outlined in the analysis, with the range of costs segregated by activity as follows:

\$0	Activity 1. (One-time training of FTOs appointed prior to 1/1/2017)
\$245,162 - \$1,454,551	Activity 2. (One-time training of FTOs appointed after 1/1/2017)
\$78,831 - \$537,985	Indirect Costs <sup>39</sup>
(\$0)	Offsetting Revenues
<b>\$323,993 - \$1,992,536</b>	<b>Total Costs</b>

The lower bound of the estimated costs above were calculated based on the actual costs for activity 2. and indirect costs claimed in the unaudited initial claims for fiscal year 2018-2019 plus the percentage of growth noted earlier in this analysis of .48 percent. The upper bound of the estimated costs above were calculated based on the weighted average cost per FTO for activity 2. and indirect costs claimed in the unaudited initial claims for fiscal year 2018-2019 (\$1,127), multiplied times the number of FTOs estimated to receive training in fiscal year 2018-2019 (1,759) plus the percentage of growth noted earlier in this analysis of .48 percent for a total of 1,768 FTOs. The calculation of fiscal year 2019-2020 and following makes no assumptions regarding offsetting revenues or reimbursements. It is anticipated that costs will grow annually by the .48 annual growth rate plus the implicit price deflator.

### **Assumptions**

Based on the claims data and other publically available information, staff made the following assumptions and used the following methodology to develop the Statewide Cost Estimate for this program.

- *The total amount claimed for the initial reimbursement period may increase as a result of late or amended initial claims.*

There are approximately 481 cities, 57 counties, 1 city and county,<sup>40</sup> and an unknown number of eligible police protection districts, each of which may have incurred costs for this program during the initial reimbursement period. Thus, there are approximately 539 potentially eligible

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of the projected potential costs for the initial reimbursement period includes activity 1., activity 2., and indirect costs and makes no assumptions regarding estimated offsetting revenues.

<sup>38</sup> The lower and higher bound of this estimate assumes all claims filed specify the amount claimed for each activity and indirect costs, and do not continue to claim activity 1 for reimbursement.

<sup>39</sup> The upper bound of this estimate assumes a weighted average percentage of the total amount claimed for indirect costs for fiscal year 2018-2019 of 27 percent.

<sup>40</sup> For the purposes of this analysis, although the City and County of San Francisco did not file a claim during the initial reimbursement period, it is added to the total number of counties (58) and is included in the weighted averages as a county.

claimants. Of those, only 113 cities, about 23 percent of all cities, filed reimbursement claims for the initial reimbursement period: 88 for fiscal year 2016-2017; 64 for fiscal year 2017-2018; and 51 for fiscal year 2018-2019. And, only 22 counties, about 38 percent of all counties, filed reimbursement claims for the initial reimbursement period: 16 for fiscal year 2016-2017; 12 for fiscal year 2017-2018; and 12 for fiscal year 2018-2019. The remaining eligible claimants may still file late claims. In addition, the 135 claimants that have already filed timely initial claims may file amended claims for additional costs not included in their timely filed claims. Late and amended initial claims may be filed until April 28, 2021, but they will be reduced by 10 percent of the amount that would have been allowed had the claim been timely filed.<sup>41</sup>

There may be several reasons that non-claiming local agencies did not file reimbursement claims, including but not limited to the following: they did not incur costs of more than \$1,000 during a fiscal year; they had no FTOs attending training in a given fiscal year, or they had a relatively low number of FTOs attending training in a given fiscal year and determined that it was not cost-effective to participate in the reimbursement claim process.

- *The total amount that may be claimed for the initial reimbursement period and for future annual costs may increase as a result of the increased number of FTOs assigned or appointed due to both an increase in the overall number of sworn law enforcement personnel (thus requiring additional FTOs) and due to turnover in existing FTO positions.*

The number of FTOs appointed or assigned who have not already received the training within the prior 24 months may be affected by both increases or decreases in the overall numbers of sworn full-time law enforcement personnel (thus requiring additional FTOs) and by turnover in existing FTO positions.

For example, the overall percentage of change in the numbers of sworn full-time law enforcement personnel between the years of 2013 and 2018 for all police departments in California was 3 percent and for all Sheriff's departments was 2.2 percent which averages to .5 and .36 percent annually. The percentage of change in the numbers of sworn full-time law enforcement personnel for police departments in 2017-2018 was similar to the average for the prior years with police departments at 0.5 percent and Sheriff's departments at 0.3 percent.<sup>42</sup> Thus we can assume .5 percent (police) and .36 percent (sheriffs) annual growth rates based on the average growth rates over the years for which data is available and an overall weighted growth rate of .48 percent.

The total turnover rates for law enforcement in the state of California were reported to be 9.19 percent in 2003 and 8.28 percent in 2008. Nationally, turnover rates varied considerably between rural areas (14.11 in 2003, 14.16 in 2008), suburban areas (9.89 in 2003 and 10.98 in 2008), and urban areas (7.57 in 2003 and 6.94 in 2008) and also between types of agency

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<sup>41</sup> Government Code sections 17561(d)(3).

<sup>42</sup> Exhibit F, Crime in California 2018, Xavier Becerra, Attorney General, California Department of Justice, California Justice Information Services Division, Bureau of Criminal Identification and Investigative Services, Criminal Justice Statistics Center, page 62, <https://data-openjustice.doj.ca.gov/sites/default/files/2019-07/Crime%20In%20CA%202018%2020190701.pdf> (accessed on December 13, 2019).



Municipal (11.59 in 2003 and 11.14 in 2008) and County (7.94 in 2003 and 9.23 in 2008).<sup>43</sup> For the purposes of this estimate, an 8.73 percent turnover rate is assumed based on the average turnover rate for California law enforcement in the years for which we have data available.

In addition, it is possible that enough seats are not available to accommodate the numbers of FTOs requiring training within the 180-day window from appointment required by the test claim statutes. For example, the expanded course outline for the Crisis Intervention Behavioral Health Training for Field Officers states “25 is the recommended maximum number of students for this course.”<sup>44</sup>

In conclusion, both overall percentage of change in the numbers of sworn full-time law enforcement personnel and the overall turnover rates of sworn law enforcement personnel may impact the number of FTOs who will be assigned or appointed and must complete training. Based on the above data on overall percentage of change in the numbers of sworn full-time law enforcement personnel and turnover rates combined adds up to 9.23 percent of the prior year’s number of FTOs for police and 9.09 percent of the prior year’s number of FTOs for sheriffs. Therefore, the weighted average percentage of change in the number of FTOs is 9.21 percent. It is further assumed that after the initial claiming period and the training of all of the pre-existing FTOs that there is now an adequate number of spaces available to train new FTOs appointed or assigned after January 1, 2017.

- *The total amount for this program may be lower than the Statewide Cost Estimate based on the Controller’s audit findings.*

The Controller may conduct audits and reduce any claim it deems to be excessive or unreasonable. Therefore, costs may be lower than the Statewide Cost Estimate based on the audit findings.

- *The future annual costs for this program will decrease with the elimination of costs for activity 1.*

The annual costs incurred for activity 1., (one-time training of FTOs appointed prior to 1/1/2017) are expected to end after the initial reimbursement period, because activity 1., was required to be completed by June 30, 2017<sup>45</sup> which is a year prior to the end of the initial reimbursement period. Conversely, the costs for activity 2., (one-time training of FTOs appointed after 1/1/2017) will continue and are assumed to remain relatively stable, because these costs are a result of turnover in FTOs who have already received the training or when a department decides to increase the number of appointments of new FTOs beginning January 1, 2017 which has

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<sup>43</sup> Exhibit F, Excerpt from the Jennifer Wareham et al, *Rates and Patterns of Law Enforcement Turnover: A Research Note*, 26-4 Criminal Justice Policy Review, 345 (2013), pages 2-5, <http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.846.1028&rep=rep1&type=pdf> (accessed on March 23, 2020).

<sup>44</sup> Exhibit F, Expanded Course Outline (8 hours), Regulation 1081 Minimum Standards for Legislatively Mandated Courses, Crisis Intervention Behavioral Health Training for Field Training Officers, [https://post.ca.gov/Portals/0/post\\_docs/resources/CIT/SB29\\_FTO\\_8HR\\_Course\\_ECO.pdf](https://post.ca.gov/Portals/0/post_docs/resources/CIT/SB29_FTO_8HR_Course_ECO.pdf) (accessed on December 13, 2019).

<sup>45</sup> Exhibit A, Decision and Parameters and Guidelines, page 8.

remained relatively consistent from year to year on a statewide basis based on the data available. The elimination of costs for activity 1., could in turn result in some local agencies being unable to reach the \$1,000 threshold in a given fiscal year to claim costs for activity 2., in certain years.

- *The estimated number of city police and county sheriff FTOs attending training for fiscal year 2016-2017 is 1,743; for fiscal year 2017-2018 is 1,751; and for fiscal year 2018-2019 is 1,759 for a total estimate of 5,253 FTOs requiring training during the initial reimbursement period.*

The actual number of turnover in staff who are FTOs and who have already received the training and the number of FTOs assigned by eligible claimants who require the training during each fiscal year is unknown.

The analysis of the test claim statute by the Senate Public Safety Committee and the Senate Appropriations Committee assumed that the reimbursable costs were those for missed work hours for all field training officers in training and made no further assumptions regarding the potential number of existing FTOs appointed before January 1, 2017 or the potential number of new FTOs appointed after January 1, 2017 requiring training.<sup>46</sup> However, the analysis of the test claim statute by the Senate Appropriations Committee, heard on May 28, 2015 states:

The current average POST reimbursement cost for officers completing the Field Training Officer Course is \$756 per attendee. Increasing the minimum training hours for field training officers by 40 hours would double POST reimbursement costs to \$1,512 per attendee. Based on an estimated 8,628 field training officers, POST reimbursement costs to address the additional 40 hours of mental health training would be \$756 per attendee for a total of \$6.5 million. POST indicates an average of 1,726 officers complete the Field Training Officer Course each year. If this bill is enacted, POST reimbursement costs per year to train field training officers would be \$2.6 million.<sup>47</sup>

Therefore, the estimated numbers of FTOs who complete the Field Training Officer Course who would be required to take the training required by the test claim statute, based on the number provided by POST to the Senate Appropriations Committee of 1,726 in 2014-2015 for the following fiscal years (assuming .48 percent growth for all fiscal years following) are: 1,734 in 2015-2016; 1,743 for 2016-2017; 1,751 for 2017-2018; 1,759 for 2018-2019 for a total of 5,253 total FTOs requiring training during the initial claiming period. For fiscal year 2019-2020, the number of FTOs requiring training is estimated to be 1,768.

### **Estimated Costs and Cost Factors for Each Reimbursable Activity**

For the purpose of estimating total annual costs incurred for this program during the initial reimbursement period and the following years, the annual cost of each reimbursable activity has been estimated based on the assumptions discussed above.

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<sup>46</sup> Exhibit B, Test Claim (Senate Bill Analyses), pages 35-46.

<sup>47</sup> Exhibit F, Senate Committee on Appropriations, 2015-2016 Regular Session, SB 29 (Beall) – Peace Officer Training: Mental Health, Bill Analysis, Version: April 15, 2015, Hearing Date: May 28, 2015, page 3.

### **A. 1. (One-time training of FTOs assigned or appointed prior to 1/1/2017)**

Activity 1., “Ensure that each FTO assigned or appointed prior to January 1, 2017 shall attend a one-time, eight-hour training on crisis intervention and behavioral health before June 30, 2017”<sup>48</sup> was approved as a one-time cost.<sup>49</sup> It is presumed that all costs for this activity will be claimed in initial claims for fiscal year 2016-2017, including amended initial claims or late claims filed for fiscal year 2016-2017, though potentially some of these one-time costs could carry over into fiscal year 2017-2018 if there were not enough spaces available to accommodate the numbers of FTOs requiring training within the 180-day window from appointment required by the test claim statute.

***Based on the assumptions and methodology discussed herein, the total cost for activity 1., for the initial reimbursement period is estimated to be \$536,130.***

FY 2016-2017: \$534,981 = (total amount of unaudited timely filed claims for activity 1.)<sup>50</sup>

FY 2017-2018: \$1,149 = (the City of Firebaugh filed a claim that included costs for Activity 1 in 2017-2018.)<sup>51</sup>

FY 2018-2019: \$0

For fiscal year 2016-2017, 88 claims from cities and 16 claims from counties were filed; of those 76 claims from cities and nine claims from counties claimed costs for activity 1., amounting to \$534,981, and one claim was filed by the City of Firebaugh of \$1,149 for activity 1., for fiscal year 2017-2018.<sup>52</sup> Of the 104 claims filed for fiscal year 2016-2017, two claims did not disaggregate costs by activity, indirect costs, or offsetting revenues or other reimbursements (City of Buena Park and the County of San Bernardino).<sup>53</sup> The lower end of the range of total cost of activity 1., for the initial reimbursement period is estimated based on the total amount of unaudited timely filed claims for activity 1., for the initial reimbursement period.

For the initial reimbursement period, 193 claims from cities and 33 claims from counties were filed that specified costs for activity 1., activity 2., and indirect costs and the numbers of FTOs

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<sup>48</sup> Exhibit A, Decision and Parameters and Guidelines, page 8.

<sup>49</sup> Exhibit A, Decision and Parameters and Guidelines, pages 7 and 8.

<sup>50</sup> Based on a review of the claims filed for the initial claiming period, the amount claimed for activity 1., for fiscal year 2016-2017 for Suisun City should be zero but specifies the amount actually claimed for activity 2., and the amount claimed for activity 2., incorrectly specifies the amount claimed for indirect costs. Zero should be the total for activity 1., \$1,509 should be the total for activity 2., and \$951 should be the total for indirect costs (see Exhibit D, Claims Data as of May 28, 2020, page 6).

<sup>51</sup> Exhibit D, Claims Data as of May 28, 2020, pages 8 and 10. The Controller notes that the cost for reimbursable activity (1) filed by the City of Firebaugh is outside the fiscal year as it is filed in 2017-2018 reimbursable period and that the claim is for further review and may be reduced.

<sup>52</sup> Exhibit D, Claims data reported as of May 28, 2020, pages 4-10.

<sup>53</sup> Exhibit D, Claims data reported as of May 28, 2020, pages 5 and 7.

trained totaling 671 FTOs for activity 1., and 1,204 FTOs for activity 2.<sup>54</sup> For activity 1., it is assumed that all costs to train all eligible claimant FTOs assigned or appointed prior to January 1, 2017 have been claimed.

- *The costs claimed for activity 1., will be eliminated from future claims, because activity 1., is required to be completed by June 30, 2017 therefore should be completed during the initial reimbursement period.*

Activity 1., is required to be completed by June 30, 2017. Therefore, it is expected that eligible claimants will have claimed those costs in their initial claims or amendments thereto and it is expected that these costs will not carry over beyond the initial claiming period.

## **B. 2. (Ongoing Costs for One-time training of FTOs appointed after 1/1/2017)**

Activity 2., “Ensure that each FTO assigned or appointed after January 1, 2017 shall attend a one-time, eight-hour training on crisis intervention and behavioral health within 180 days of being assigned or appointed as an FTO”<sup>55</sup> was approved as an ongoing cost for the one time training of each new FTO beginning January 1, 2017.<sup>56</sup> Costs for this activity may be claimed in initial claims, late, and amended claims for fiscal years 2016-2017, 2017-2018, and 2018-2019, as well as in annual claims for fiscal year 2019-2020 and following.

***Based on the assumptions and methodology discussed herein, the total cost for activity 2., for the initial reimbursement period is estimated to be between \$1,075,577 and \$3,441,020.***

FY 2016-2017, 2017-2018, 2018-2019:

\$1,075,577 = (total amount of unaudited timely filed claims for activity 2., for the initial reimbursement period)<sup>57</sup> - \$3,441,020 = (total amount of unaudited timely filed claims for activity 2., as amended, plus late claims assuming that costs were claimed for all eligible claimant FTOs assigned or appointed beginning 1/1/2017).

- *The total cost of activity 2., for the initial reimbursement period is estimated at \$1,075,577 - \$3,441,020.*

For cities, 29 of 88 claims for 2016-2017, 63 of 64 claims for 2017-2018, and 49 of 51 claims for 2018-2019; for counties, 11 of 16 claims for 2016-2017, 11 of 12 claims for 2017-2018, and 11

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<sup>54</sup> See Tables 1, 2, 3, and 4 (The higher end of the range of costs is calculated based on the total estimated number of FTOs requiring training each fiscal year. For purposes of calculating the costs per FTO, claims that did not clearly specify the amount claimed for activity 1., activity 2., and indirect costs (7) or clearly specify the number of FTOs for which costs were claimed (10) were excluded from the tables as specified).

<sup>55</sup> Exhibit A, Decision and Parameters and Guidelines, page 8.

<sup>56</sup> Exhibit A, Decision and Parameters and Guidelines, pages 7 and 8.

<sup>57</sup> Based on a review of the claims filed for the initial claiming period, the amount claimed for activity 1., for fiscal year 2016-2017 for Suisun City should be zero but specifies the amount actually claimed for activity 2., and the amount claimed for activity 2., incorrectly specifies the amount claimed for indirect costs. Zero should be the total for activity 1., \$1,509 should be the total for activity 2., and \$951 should be the total for indirect costs (see Exhibit D, Claims Data as of May 28, 2020, page 6).

out of 12 claims for 2018-2019 filed included costs for activity 2., amounting to a total of \$1,075,577 for fiscal years 2016-2017, 2017-2018, and 2018-2019.<sup>58</sup>

For the initial claiming period, 193 claims from cities and 33 claims from counties included the costs claimed for activity 1., activity 2., and indirect costs, and the numbers of FTOs trained totaling 671 FTOs for activity 1., and 1,204 FTOs for activity 2.<sup>59</sup> In addition, 17 claims either did not indicate the amount claimed for activity 1., activity 2., and indirect costs and only provided a total claim amount or did not clearly specify the number of FTOs claimed, for a total of \$399,684.

Assuming a total estimated number of assigned or appointed FTOs during the initial claiming period of 5,253, a total weighted average cost claimed per FTO of \$1,118 (\$783 for activity 2., and \$335 for indirect costs claimed at a weighted average rate of 30%), costs claimed to train 1,875 total FTOs specified, and approximately 357 FTOs costs' claimed but not specified during the initial reimbursement period ( $\$399,684 / \$1,118 = 357$ ), it is possible that the unclaimed costs for the remaining 3,021 FTOs could all be claimed under activity 2., in late or amended claims.

The total cost of activity 2., for the initial reimbursement period is estimated to be between the total amount of unaudited timely filed claims for activity 2., for the initial reimbursement period (\$1,075,577) and the total amount that could be claimed including late or amended claims. The higher end of the estimate includes the costs that have been claimed for this activity plus the estimated cost per FTO of \$783 for activity 2., multiplied by the estimated number of FTOs who were required to be trained during the initial reimbursement period but for whom costs have not been claimed (3,021) which equals \$2,365,443 for a total cost of \$3,441,020.

***Based on the assumptions and methodology discussed herein, the total cost for indirect costs for the initial reimbursement period is estimated to be between \$656,112 and \$1,668,147.***

FY 2016-2017, 2017-2018, 2018-2019:

\$656,112 = (total amount of unaudited timely filed claims for indirect costs for the initial reimbursement period) - \$1,668,147<sup>60</sup> = (total amount of unaudited timely filed claims for indirect costs, as amended, plus late claims assuming that costs were claimed for all eligible claimant FTOs assigned or appointed beginning 1/1/2017).

- *The total cost of indirect costs for the initial reimbursement period is estimated at \$656,112 - \$1,668,147.*

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<sup>58</sup> Exhibit D, Claims data reported as of May 28, 2020.

<sup>59</sup> See Tables 1, 2, 3, and 4 (The higher end of the range of costs is calculated assuming costs are claimed for the total estimated number of FTOs requiring training each fiscal year. For purposes of calculating the costs per FTO, claims that did not clearly specify the amount claimed for activity 1., activity 2., and indirect costs (7) or clearly specify the number of FTOs for which costs were claimed (10) were excluded from the tables as specified).

<sup>60</sup> The upper bound of this estimate assumes that costs will be claimed for an estimated 5,253 FTOs assigned or appointed during the initial claiming period and a total weighted average cost claimed per FTO of \$1,118 (\$783 for activity 2., and \$335 for indirect costs claimed at a weighted average rate of 30%).

The total costs for activity 2., and indirect costs for the estimated 3,021 FTOs remaining of the total estimated 5,253 FTOs at \$1,118 per FTO (\$783 for activity 2., and \$335 for indirect costs claimed at a weighted average rate of 30%) that have not yet been claimed for the initial claiming period is \$3,377,478 (3,021 x \$1,118); \$2,365,443 for activity 2., (3,021 x \$783); and \$1,012,035 (3,021 x \$335) for indirect costs.

The total cost of indirect costs for the initial reimbursement period is estimated to be between the total amount of unaudited timely filed claims for indirect costs for the initial reimbursement period (\$656,112) and the total amount that could be claimed including late or amended claims. The higher end of the range assumes that costs were claimed for all eligible claimant FTOs assigned or appointed beginning January 1, 2017 and that indirect costs were claimed at the weighted average rate of 30 percent ( $\$656,112 + (3,021 \times \$335) = \$1,668,147$ ).

***Based on the assumptions and methodology discussed herein, the total possible late filing penalty for estimated late claims and amended claims for activity 2., and indirect costs for the initial reimbursement period is estimated to be \$337,748.***

FY 2016-2017, 2017-2018, 2018-2019:

\$2,365,443 (remaining potential FTOs to be claimed multiplied by the weighted average costs for activity 2., (3,021 x \$783)) + \$1,012,035 (remaining potential FTOs to be claimed multiplied by weighted average indirect costs (3,021 x \$335)) x 10 percent = \$337,748.

- *The costs claimed for activity 2., will continue, because activity 2., is required to be completed within 180 days of assignment or appointment as an FTO.*

Activity 2., is required to be completed within 180 days of assignment or appointment as an FTO.<sup>61</sup> Therefore, it is expected that eligible claimants will claim those costs in their initial claims or amendments thereto, as well as in future claims.

- *The weighted average cost of activity 1., and activity 2., and indirect costs per FTO assigned for fiscal year 2016-2017, 2017-2018, 2018-2019 is estimated at \$1,118 and the total weighed average amount of indirect costs is estimated at 30 percent.*

The average cost of activity 1., activity 2., and indirect costs per FTO assigned can be estimated based on the claims data for the cost of activity 1., activity 2., and indirect costs, and the number of FTOs for which these costs were claimed.

Nearly all the claims filed for the initial claiming period that specified costs for activity 1., activity 2., indirect costs, and offsetting revenue or other reimbursements include information on the number of FTOs. Of the 2016-2017 claims, two cities' and two counties' claims, of the 2017-2018 claims, two cities' and one county's claims, and of the 2018-2019 claims two cities' and one county's claims either provided no information on the number of FTOs claimed or the information was unclear in the claim. Accordingly, for the purpose of estimating the average cost per FTO only the cost data from the claims that provided information on the amount claimed for activity 1., activity 2., and indirect costs and the number of FTOs are included in the calculation (see Table 1, FY 2016-2017 (85 cities' claims and 13 counties' claims); Table 2, FY 2017-2018 (61 cities' claims and 10 counties' claims); and Table 3, FY 2018-2019 (47 cities'

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<sup>61</sup> Exhibit A, Decision and Parameters and Guidelines, page 8.

claims and 10 counties' claims) below). These claims represent 193 claims from cities and 33 claims from counties.<sup>62</sup>

For 2016-2017, 85 of 88 cities claimed costs for a total of 602 FTOs for activity 1., 540 FTOs for activity 2., and indirect costs, totaling \$1,295,261; and 13 of 16 counties claimed costs for 64 FTOs for activity 1., 78 FTOs for activity 2., and indirect costs, totaling \$146,663.

For 2017-2018, 61 of 64 cities claimed costs for a total of 5 FTOs for activity 1., 275 FTOs for activity 2., and indirect costs, totaling \$308,491; and for 10 of 12 counties zero claimed costs for activity 1., 69 FTOs for activity 2., and indirect costs, totaling \$78,810.

For 2018-2019, 47 of 51 cities claimed zero costs for activity 1., 176 FTOs for activity 2., and indirect costs, totaling \$205,314; and 10 of 12 counties claimed zero costs for activity 1., 66 FTOs for activity 2., and indirect costs amounting to \$62,240.

Therefore, the total costs claimed by cities that specified the number of FTOs claimed for 1,598 FTOs comes to \$1,809,066 and the total costs claimed by counties that specified the number of FTOs claimed for 277 FTOs comes to \$287,713 for the initial claiming period.<sup>63</sup> Based on the total number of FTOs who complete the course annually provided by POST to the Senate Appropriations Committee noted earlier of 1726 in 2014-2015<sup>64</sup> and on the growth rate of FTOs annually of .48 percent, the approximate number of FTOs can be estimated at 1,734 for 2015-2016, 1,743 for 2016-2017, 1,751 for 2017-2018, 1,759 for 2018-2019, and 1,768 for 2019-2020.

In its bill analysis, the Senate Committee on Appropriations estimated the costs per FTO based on the initial estimate of costs per attendee to attend the Field Training Officer Course of \$756 provided by POST to the Legislature.<sup>65</sup> However, based on the amount of actual costs claimed, the estimated number of FTOs completing the course for which costs were claimed during the initial reimbursement period for 2016-2017 for cities are 1,142 FTOs and for counties are 142 FTOs for a total of 1,284 FTOs which represents approximately 74 percent of the total estimated number of FTOs appointed or assigned that year; for 2017-2018 for cities are 280 FTOs and for counties are 69 FTOs for a total of 349 FTOs which represents approximately 20 percent of the total estimated number of FTOs required to be trained; and for 2018-2019 for cities are 176 FTOs and for counties are 66 FTOs for a total of 242 FTOs which represents approximately 14 percent of the total estimated number of FTOs assigned or appointed that year. Overall, costs for the training of 1,875 FTOs were claimed, representing approximately 36 percent of the total assumed number of 5,253 FTOs trained during the initial claiming period.

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<sup>62</sup> For purposes of calculating the costs per FTO, claims that did not clearly specify the amount claimed for activity 1., activity 2., and indirect costs (7) or clearly specify the number of FTOs for which costs were claimed (10) were excluded from the tables as specified.

<sup>63</sup> Exhibit D, Claims data reported as of May 28, 2020.

<sup>64</sup> Exhibit F, Senate Committee on Appropriations, 2015-2016 Regular Session, SB 29 (Beall) – Peace Officer Training: Mental Health, Bill Analysis, Version: April 15, 2015, Hearing Date: May 28, 2015, page 3.

<sup>65</sup> Exhibit F, Senate Committee on Appropriations, 2015-2016 Regular Session, SB 29 (Beall) – Peace Officer Training: Mental Health, Bill Analysis, Version: April 15, 2015, Hearing Date: May 28, 2015, page 3.

For cities, the 193 unaudited claims included in the calculation identify in total 607 FTOs completed activity 1., and 991 FTOs completed activity 2., including indirect costs and less offsetting revenue or reimbursements claimed amounts to a total of 1,598 FTOs at an average of \$1,132 per FTO for the initial claiming period. For counties, the 33 unaudited claims included in the calculation identify in total 64 FTOs completed activity 1 and 213 FTOs completed activity 2, including indirect costs and less offsetting revenue or reimbursements claimed amounts to a total of 277 FTOs at an average of \$1,039 per FTO for the initial reimbursement period. Therefore, the weighted average of cost per FTO for this program is \$1,118, which is 34 percent higher than the estimate of \$736 originally provided to the Legislature for this program. This may be in part due to the fact that indirect costs, which constitute a weighted average of 30 percent<sup>66</sup> of the total costs for each year in the initial claiming period, were not considered in the bill analysis. Additionally, at least some of the claims include the costs of travel and meals for the officers during the training period.

**Table 1**

FY 2016-2017 (98 of 104 claims)<sup>67</sup>

	<b>Claimant</b>	<b>1 Before 1/1/2017</b>	<b>FTO</b>	<b>2 After 1/1/2017</b>	<b>FTO</b>	<b>Indirect Costs</b>	<b>Total Cost<sup>68</sup></b>
1	CITY OF HAYWARD	\$10,272	12	\$ -	0	\$3,176	\$13,448
2	CITY OF NEWARK	\$11,584	10	\$ -	0	\$7,839	\$11,569
3	CITY OF OAKLAND	\$3,442	4	\$4,406	5	\$2,427	\$10,275
4	CITY OF PLEASANTON	\$8,702	10	\$ -	0	\$536	\$9,238
5	CITY OF UNION CITY	\$2,912	4	\$2,912	4	\$1,928	\$7,752
6	CITY OF JACKSON	\$1,425	3	\$ -	0	\$943	\$2,368

<sup>66</sup> During the initial reimbursement period, for cities, the average percentage of the cost per FTO is 30 percent indirect costs; for counties, the average percentage of the indirect costs per FTO is 29 percent (see Table 4).

<sup>67</sup> Exhibit D, Claims Data as of May 28, 2020 (Table 1 excludes the following six claims from this table to calculate the costs per FTO for fiscal year 2016-2017 because they do not specify the amount claimed for activity 1., activity 2., and indirect costs or because the number of FTOs is not provided: City of Glendora (\$13,864), the city of Buena Park (\$5,621), the Town of Apple Valley (\$7,675), the County of San Bernardino (\$86,834), the County of Santa Barbara (\$26,733), and the County of Ventura (\$11,982)), pages 4-7.

<sup>68</sup> The total cost provided is less any reported offsetting revenue or other reimbursements. Of the 2016-2017 claims, two included this information that is not provided separately here: the City of Newark reported \$7,854 in offsetting revenue; and the City of Claremont reported \$4,389 in other reimbursements (see Exhibit D, Claims Data as of May 28, 2020, pages 4 and 7).



	<b>Claimant</b>	<b>1 Before 1/1/2017</b>	<b>FTO</b>	<b>2 After 1/1/2017</b>	<b>FTO</b>	<b>Indirect Costs</b>	<b>Total Cost<sup>68</sup></b>
7	CITY OF CHICO	\$5,858	9		0	\$2,844	\$8,702
8	CITY OF OROVILLE	\$5,711	8	\$ -	0	\$2,476	\$8,187
9	CITY OF PLEASANT HILL	\$ -	0	\$2,439	4	\$1,413	\$3,852
10	CITY OF SAN PABLO	\$981	1	\$ -	0	\$407	\$1,388
11	CITY OF CRESCENT CITY	\$2,068	3	\$ -	0	\$466	\$2,534
12	CITY OF SOUTH LAKE TAHOE	\$7,060	8	\$ -	0	\$5,866	\$12,926
13	CITY OF CLOVIS	\$1,246	2	\$ -	0	\$373	\$1,619
14	CITY OF FRESNO	\$39,133	56	\$ -	0	\$13,054	\$52,187
15	CITY OF LAKEPORT	\$1,232	3	\$ -	0	\$317	\$1,549
16	CITY OF ARCADIA	\$6,223	8	\$ -	0	\$4,512	\$10,735
17	CITY OF BELL	\$6,325	10	\$ -	0	\$1,873	\$8,198
18	CITY OF CLAREMONT	\$6,563	9	\$ -	0	\$4,760	\$6,934
19	CITY OF DOWNEY	\$17,639	22	\$ -	0	\$8,709	\$26,348
20	CITY OF EL MONTE	\$3,605	6	\$1,815	3	\$1,704	\$7,124
21	CITY OF HUNTINGTON PARK	\$3,006	4	\$2,282	3	\$3,578	\$8,866
22	CITY OF LAKEWOOD	\$4,350	4	\$ -	0	\$635	\$4,985
23	CITY OF LOS ANGELES	\$ -	0	\$368,496	428	\$176,928	\$545,424
24	CITY OF MONROVIA	\$4,441	6	\$ -	0	\$3,375	\$7,816
25	CITY OF PALMDALE	\$5,239	5	\$ -	0	\$634	\$5,873

	<b>Claimant</b>	<b>1 Before 1/1/2017</b>	<b>FTO</b>	<b>2 After 1/1/2017</b>	<b>FTO</b>	<b>Indirect Costs</b>	<b>Total Cost<sup>68</sup></b>
26	CITY OF RANCHO PALOS VERDES	\$5,239	5	\$ -	0	\$602	\$5,841
27	CITY OF SAN GABRIEL	\$2,192	3	\$ -	0	\$2,032	\$4,224
28	CITY OF SANTA MONICA	\$13,125	15	\$ -	0	\$4,882	\$18,007
29	CITY OF WEST COVINA	\$1,348	1	\$6,048	4	\$799	\$8,195
30	CITY OF WHITTIER	\$ -	0	\$2,616	4	\$453	\$3,069
31	CITY OF NOVATO	\$1,795	3	\$ -	0	\$424	\$2,219
32	CITY OF LOS BANOS	\$963	2	\$ -	0	\$287	\$1,250
33	CITY OF MONTEREY	\$677	1	\$4,064	6	\$964	\$5,705
34	TOWN OF TRUCKEE	\$448	1	\$448	1	\$449	\$1,345
35	CITY OF BREA	\$4,297	5	\$ -	0	\$1,776	\$6,073
36	CITY OF COSTA MESA	\$19,174	22	\$ -	0	\$10,207	\$29,381
37	CITY OF CYPRESS	\$12,683	16	\$787	1	\$3,642	\$17,112
38	CITY OF GARDEN GROVE	\$14,105	17	\$ -	0	\$5,658	\$19,763
39	CITY OF HUNTINGTON BEACH	\$ -	0	\$1,624	2	\$244	\$1,868
40	CITY OF IRVINE	\$5,750	6	\$ -	0	\$2,647	\$8,397
41	CITY OF LAGUNA NIGUEL	\$7,582	9	\$ -	0	\$4,134	\$11,716
42	CITY OF LAKE FOREST	\$9,207	9	\$ -	0	\$4,162	\$13,369
43	CITY OF NEWPORT BEACH	\$4,098	6	\$3,415	5	\$2,329	\$9,842

	<b>Claimant</b>	<b>1 Before 1/1/2017</b>	<b>FTO</b>	<b>2 After 1/1/2017</b>	<b>FTO</b>	<b>Indirect Costs</b>	<b>Total Cost<sup>68</sup></b>
44	CITY OF PLACENTIA	\$3,255	5	\$ -	0	\$646	\$3,901
45	CITY OF STANTON	\$4,153	4	\$ -	0	\$1,897	\$6,050
46	CITY OF TUSTIN	\$2,773	4	\$ -	0	\$2,482	\$5,255
47	CITY OF ROCKLIN	\$4,542	7	\$ -	0	\$2,590	\$7,132
48	CITY OF ROSEVILLE	\$11,109	17	\$ -	0	\$10,520	\$21,629
49	CITY OF BANNING	\$3,197	5	\$ -	0	\$2,950	\$6,147
50	CITY OF BEAUMONT	\$2,658	5	\$ -	0	\$895	\$3,553
51	CITY OF HEMET	\$18,362	50	\$16,199	0	\$15,552	\$50,113
52	CITY OF INDIO	\$ -	0	\$5,449	7	\$1,877	\$7,326
53	CITY OF FOLSOM	\$5,144	7	\$ -	0	\$962	\$6,106
54	CITY OF CHINO	\$1,383	2	\$ -	0	\$1,198	\$2,581
55	CITY OF FONTANA	\$ -	0	\$11,483	18	\$3,081	\$14,564
56	CITY OF HESPERIA	\$3,844	5	\$ -	0	\$2,640	\$6,484
57	CITY OF MONTCLAIR	\$8,236	13	\$ -	0	\$4,878	\$13,114
58	CITY OF RANCHO CUCAMONGA	\$10,762	14	\$ -	0	\$6,716	\$17,478
59	CITY OF REDLANDS	\$2,962	4	\$ -	0	\$742	\$3,704
60	CITY OF SAN BERNARDINO	\$6,566	9	\$4,200	6	\$4,068	\$14,834
61	CITY OF CARLSBAD	\$12,551	17	\$763	1	\$5,379	\$18,693
62	CITY OF CORONADO	\$745	1	\$4,366	6	\$2,046	\$7,157
63	CITY OF EL CAJON	\$ -	0	\$3,118	5	\$1,143	\$4,261
64	CITY OF ENCINITAS	\$12,986	17	\$ -	0	\$9,662	\$22,648

	<b>Claimant</b>	<b>1 Before 1/1/2017</b>	<b>FTO</b>	<b>2 After 1/1/2017</b>	<b>FTO</b>	<b>Indirect Costs</b>	<b>Total Cost<sup>68</sup></b>
65	CITY OF OCEANSIDE	\$3,882	6	\$647	1	\$1,214	\$5,743
66	CITY OF SAN MARCOS	\$4,583	6	\$ -	0	\$3,209	\$7,792
67	CITY OF STOCKTON	\$3,606	6	\$5,409	9	\$2,959	\$11,974
68	CITY OF ARROYO GRANDE	\$ -	0	\$788	1	\$275	\$1,063
69	CITY OF EL PASO DE ROBLES	\$ -	0	\$3,363	4	\$1,229	\$4,592
70	CITY OF FOSTER CITY	\$ -	0	\$1,938	2	\$803	\$2,741
71	CITY OF SAN MATEO	\$4,458	6	\$803	1	\$2,273	\$7,534
72	CITY OF SANTA BARBARA	\$3,639	5	\$1,044	3	\$1,363	\$6,046
73	CITY OF MORGAN HILL	\$9,336	12	\$2,248	3	\$2,479	\$14,063
74	CITY OF SANTA CLARA	\$6,404	6	\$ -	0	\$854	\$7,258
75	CITY OF SUNNYVALE	\$4,482	4	\$ -	0	\$778	\$5,260
76	CITY OF ANDERSON	\$3,510	7	\$ -	0	\$1,383	\$4,893
77	CITY OF FAIRFIELD	\$735	2	\$ -	0	\$267	\$1,002
78	CITY OF SUISUN CITY <sup>69</sup>	\$ -	0	\$1,509	3	\$951	\$2,460
79	CITY OF VACAVILLE <sup>70</sup>	\$814	1	\$ -	0	\$230	\$1,044

<sup>69</sup> Based on a review of the claims filed for the initial claiming period, the amount claimed for activity 1., for fiscal year 2016-2017 for Suisun City should be zero but specifies the amount actually claimed for activity 2., and the amount claimed for activity 2., incorrectly specifies the amount claimed for indirect costs. Zero should be the total for activity 1., \$1,509 should be the total for activity 2., and \$951 should be the total for indirect costs (see Exhibit D, Claims Data as of May 28, 2020, page 6).

<sup>70</sup> Exhibit D, Claims Data as of May 28, 2020 (The Controller notes that the claimant combined grant funding into total and omitted offsetting revenue in calculation), pages 6-7.

	<b>Claimant</b>	<b>1 Before 1/1/2017</b>	<b>FTO</b>	<b>2 After 1/1/2017</b>	<b>FTO</b>	<b>Indirect Costs</b>	<b>Total Cost<sup>68</sup></b>
80	CITY OF COTATI	\$2,156	3	\$ -	0	\$487	\$2,643
81	CITY OF SANTA ROSA	\$6,961	9	\$ -	0	\$1,370	\$8,331
82	CITY OF OAKDALE	\$1,609	3	\$ -	0	\$609	\$2,218
83	CITY OF RED BLUFF	\$2,929	6	\$ -	0	\$875	\$3,804
84	CITY OF WOODLAKE	\$1,158	2	\$ -	0	\$314	\$1,472
85	CITY OF MARYSVILLE	\$2,295	4	\$ -	0	\$1,030	\$3,325
	<b>TOTAL CITY 2016-2017</b>	<b>\$439,485</b>	<b>602</b>	<b>\$464,679</b>	<b>540</b>	<b>\$403,340</b>	<b>\$1,295,261</b>
1	COUNTY OF ALAMEDA	\$ -	0	\$987	1	\$447	\$1,434
2	COUNTY OF CALAVERAS	\$1,862	4	\$463	1	\$1,070	\$3,395
3	COUNTY OF DEL NORTE	\$ -	0	\$1,536	3	\$786	\$2,322
4	COUNTY OF MENDOCINO	\$7,482	9	\$1,019	1	\$3,391	\$11,892
5	COUNTY OF NEVADA	\$ -	0	\$6,321	9	\$3,753	\$10,074
6	COUNTY OF ORANGE	\$3,389	4	\$2,561	3	\$3,082	\$9,032
7	COUNTY OF RIVERSIDE	\$9,162	13	\$ -	0	\$3,740	\$12,902
8	COUNTY OF SACRAMENTO	\$ -	0	\$18,825	25	\$8,413	\$27,238
9	COUNTY OF SAN JOAQUIN	\$9,979	14	\$13,095	8	\$6,170	\$29,244
10	COUNTY OF SANTA CLARA	\$15,839	15	\$ -	0	\$5,189	\$21,028
11	COUNTY OF TEHAMA	\$ -	0	\$2,127	4	\$924	\$3,051
12	COUNTY OF TUOLUMNE	\$2,657	5	\$461	1	\$1,183	\$4,301
13	COUNTY OF YOLO	\$ -	0	\$7,344	12	\$3,406	\$10,750

	<b>Claimant</b>	<b>1 Before 1/1/2017</b>	<b>FTO</b>	<b>2 After 1/1/2017</b>	<b>FTO</b>	<b>Indirect Costs</b>	<b>Total Cost<sup>68</sup></b>
	<b>TOTAL COUNTY 2016-2017</b>	<b>\$50,370</b>	<b>64</b>	<b>\$54,739</b>	<b>78</b>	<b>\$41,554</b>	<b>\$146,663</b>
	<b>TOTAL 2016-2017</b>	<b>\$489,855</b>	<b>666</b>	<b>\$519,418</b>	<b>618</b>	<b>\$444,894</b>	<b>\$1,441,924</b>

**Table 2**

FY 2017-2018 (71 of 76 claims)<sup>71</sup>

	<b>Claimant</b>	<b>1 Before 1/1/2017</b>	<b>FTO</b>	<b>2 After 1/1/2017</b>	<b>FTO</b>	<b>Indirect Costs</b>	<b>Total Cost<sup>72</sup></b>
1	CITY OF FREMONT	\$ -	0	\$2,464	3	\$723	\$3,187
2	CITY OF HAYWARD	\$ -	3	\$2,421	0	\$814	\$3,235
3	CITY OF OAKLAND	\$ -	0	\$831	1	\$279	\$1,110
4	CITY OF PLEASANTON	\$ -	0	\$2,979	3	\$918	\$3,897
5	CITY OF CHICO	\$ -	0	\$3,907	5	\$1,584	\$5,491
6	CITY OF PLEASANT HILL	\$ -	0	\$1,639	3	\$1,039	\$2,678
7	CITY OF SAN PABLO	\$ -	0	\$2,815	3	\$1,165	\$3,980
8	CITY OF WALNUT CREEK	\$ -	0	\$2,089	3	\$1,145	\$3,234
9	CITY OF CLOVIS	\$ -	0	\$1,293	2	\$481	\$1,774

<sup>71</sup> Exhibit D, Claims Data as of May 28, 2020 (Table 2 excludes the following five claims from this table to calculate the costs per FTO for fiscal year 2017-2018 because the claim does not specify the amount claimed for activity 1., activity 2., and indirect costs or because the number of FTOs is not provided in the claim: City of Chino (\$8,401), City of Huntington Park (\$2,211), the City of Pasadena (\$5,676), the County of San Bernardino (\$89,420), and the County of Ventura (\$35,765)), pages 8-10.

<sup>72</sup> Exhibit D, Claims Data as of May 28, 2020 (None of the claims filed for fiscal year 2017-2018 identified offsetting revenue or reimbursements for this program), pages 8-10.

	<b>Claimant</b>	<b>1 Before 1/1/2017</b>	<b>FTO</b>	<b>2 After 1/1/2017</b>	<b>FTO</b>	<b>Indirect Costs</b>	<b>Total Cost<sup>72</sup></b>
10	CITY OF FIREBAUGH <sup>73</sup>	\$1,149	2	\$574	1	\$709	\$2,432
11	CITY OF HANFORD	\$ -	0	\$966	2	\$604	\$1,570
12	CITY OF ALHAMBRA	\$ -	0	\$881	1	\$339	\$1,220
13	CITY OF ARCADIA	\$ -	0	\$1,713	2	\$1,182	\$2,895
14	CITY OF DOWNEY	\$ -	0	\$8,633	11	\$4,527	\$13,160
15	CITY OF LAKEWOOD	\$ -	0	\$2,175	2	\$328	\$2,503
16	CITY OF MANHATTAN BEACH	\$ -	0	\$8,072	8	\$3,197	\$11,269
17	CITY OF MONROVIA	\$ -	0	\$2,915	5	\$2,152	\$5,067
18	CITY OF PALMDALE	\$ -	0	\$6,525	6	\$880	\$7,405
19	CITY OF RANCHO PALOS VERDES	\$ -	0	\$3,346	3	\$341	\$3,687
20	CITY OF SAN GABRIEL	\$ -	0	\$656	1	\$704	\$1,360
21	CITY OF SANTA MONICA	\$ -	0	\$1,921	2	\$605	\$2,526
22	CITY OF WEST HOLLYWOOD	\$ -	0	\$3,262	5	\$571	\$3,833
23	CITY OF WHITTIER	\$ -	0	\$1,338	2	\$250	\$1,588
24	CITY OF MADERA	\$ -	0	\$2,448	3	\$554	\$3,002
25	CITY OF SAN RAFAEL	\$ -	0	\$5,822	6	\$1,979	\$7,801
26	CITY OF MONTEREY	\$ -	0	\$820	1	\$235	\$1,055
27	CITY OF BREA	\$ -	0	\$2,222	3	\$612	\$2,834

<sup>73</sup> Exhibit D, Claims Data as of May 28, 2020, pages 8 and 10. The Controller notes that the cost for reimbursable activity (1) filed by the City of Firebaugh is outside the fiscal year as it is filed in 2017-2018 reimbursable period and that the claim is for further review and may be reduced.

	<b>Claimant</b>	<b>1 Before 1/1/2017</b>	<b>FTO</b>	<b>2 After 1/1/2017</b>	<b>FTO</b>	<b>Indirect Costs</b>	<b>Total Cost<sup>72</sup></b>
28	CITY OF BUENA PARK	\$ -	0	\$3,201	4	\$1,778	\$4,979
29	CITY OF COSTA MESA	\$ -	0	\$4,423	5	\$2,449	\$6,872
30	CITY OF GARDEN GROVE	\$ -	0	\$3,570	4	\$1,393	\$4,963
31	CITY OF HUNTINGTON BEACH	\$ -	0	\$7,889	10	\$1,066	\$8,955
32	CITY OF IRVINE	\$ -	0	\$3,299	4	\$1,339	\$4,638
33	CITY OF LAGUNA NIGUEL	\$ -	0	\$4,561	4	\$1,980	\$6,541
34	CITY OF SAN JUAN CAPISTRANO	\$ -	0	\$3,421	3	\$2,025	\$5,446
35	CITY OF STANTON	\$ -	0	\$3,274	3	\$1,673	\$4,947
36	CITY OF TUSTIN	\$ -	0	\$659	1	\$531	\$1,190
37	CITY OF ROSEVILLE	\$ -	0	\$4,080	6	\$3,766	\$7,846
38	CATHEDRAL CITY	\$ -	0	\$1,524	2	\$909	\$2,433
39	CITY OF HOLLISTER	\$ -	0	\$4,770	7	\$1,567	\$6,337
40	TOWN OF APPLE VALLEY	\$ -	0	\$3,176	4	\$1,823	\$4,999
41	CITY OF FONTANA	\$ -	0	\$3,196	5	\$856	\$4,052
42	CITY OF HESPERIA	\$ -	0	\$2,382	3	\$1,398	\$3,780
43	CITY OF MONTCLAIR	\$ -	0	\$1,947	3	\$1,186	\$3,133
44	CITY OF RANCHO CUCAMONGA	\$ -	0	\$1,588	2	\$846	\$2,434
45	CITY OF REDLANDS	\$ -	0	\$6,722	9	\$1,747	\$8,469



	<b>Claimant</b>	<b>1 Before 1/1/2017</b>	<b>FTO</b>	<b>2 After 1/1/2017</b>	<b>FTO</b>	<b>Indirect Costs</b>	<b>Total Cost<sup>72</sup></b>
46	CITY OF SAN BERNARDINO	\$ -	0	\$9,127	12	\$3,172	\$12,299
47	CITY OF CARLSBAD	\$ -	0	\$12,792	18	\$4,848	\$17,640
48	CITY OF CORONADO	\$ -	0	\$2,030	3	\$1,031	\$3,061
49	CITY OF ENCINITAS	\$ -	0	\$4,049	5	\$3,012	\$7,061
50	CITY OF NATIONAL CITY	\$ -	0	\$8,712	12	\$3,051	\$11,763
51	CITY OF OCEANSIDE	\$ -	0	\$2,544	4	\$656	\$3,200
52	CITY OF SAN MARCOS	\$ -	0	\$3,239	4	\$2,264	\$5,503
53	CITY OF MANTECA	\$ -	0	\$1,530	2	\$425	\$1,955
54	CITY OF STOCKTON	\$ -	0	\$17,880	26	\$7,123	\$25,003
55	CITY OF ARROYO GRANDE	\$ -	0	\$784	1	\$284	\$1,068
56	CITY OF SAN MATEO	\$ -	0	\$1,508	2	\$703	\$2,211
57	CITY OF SAN JOSE	\$ -	0	\$9,886	9	\$2,512	\$12,398
58	CITY OF SANTA CLARA	\$ -	0	\$2,199	2	\$288	\$2,487
59	CITY OF SANTA ROSA	\$ -	0	\$914	1	\$173	\$1,087
60	CITY OF TURLOCK	\$ -	0	\$2,347	4	\$861	\$3,208
61	CITY OF YUBA CITY	\$ -	0	\$2,097	4	\$643	\$2,740
	<b>TOTAL CITY 2017-2018</b>	<b>\$1,149</b>	<b>5</b>	<b>\$220,047</b>	<b>275</b>	<b>\$87,295</b>	<b>\$308,491</b>
1	COUNTY OF ALAMEDA	\$ -	0	\$7,831	8	\$3,324	\$11,155
2	COUNTY OF DEL NORTE	\$ -	0	\$4,956	8	\$2,512	\$7,468
3	COUNTY OF KINGS	\$ -	0	\$1,002	2	\$574	\$1,576

	<b>Claimant</b>	<b>1 Before 1/1/2017</b>	<b>FTO</b>	<b>2 After 1/1/2017</b>	<b>FTO</b>	<b>Indirect Costs</b>	<b>Total Cost<sup>72</sup></b>
4	COUNTY OF MENDOCINO	\$ -	0	\$1,025	1	\$298	\$1,323
5	COUNTY OF NEVADA	\$ -	0	\$1,208	2	\$613	\$1,821
6	COUNTY OF RIVERSIDE	\$ -	0	\$1,190	2	\$353	\$1,543
7	COUNTY OF SACRAMENTO	\$ -	0	\$16,507	22	\$7,565	\$24,072
8	COUNTY OF SAN JOAQUIN	\$ -	0	\$2,240	3	\$589	\$2,829
9	COUNTY OF SANTA CLARA	\$ -	0	\$6,322	6	\$2,412	\$8,734
10	COUNTY OF SONOMA	\$ -	0	\$14,605	15	\$3,684	\$18,289
	<b>TOTAL COUNTY 2017-2018</b>	<b>\$ -</b>	<b>0</b>	<b>\$56,886</b>	<b>69</b>	<b>\$21,924</b>	<b>\$78,810</b>
	<b>TOTAL 2017-2018</b>	<b>\$1,149</b>	<b>5</b>	<b>\$276,933</b>	<b>344</b>	<b>\$109,219</b>	<b>\$308,491</b>

**Table 3**

FY 2018-2019 (57 of 63 claims)<sup>74</sup>

	<b>Claimant</b>	<b>1 Before 1/1/2017</b>	<b>FTO</b>	<b>2 After 1/1/2017</b>	<b>FTO</b>	<b>Indirect Costs</b>	<b>Total Cost<sup>75</sup></b>
1	CITY OF FREMONT	\$ -	0	\$3,319	4	\$1,151	\$4,470
2	CITY OF OAKLAND	\$ -	0	\$3,956	4	\$1,238	\$5,194
3	CITY OF CHICO	\$ -	0	\$3,512	4	\$1,271	\$3,793

<sup>74</sup> Exhibit D, Claims Data as of May 28, 2020 (Table 3 excludes the following six claims from this table to calculate the costs per FTO for fiscal year 2018-2019 because the claim does not specify the amount claimed for activity 1., activity 2., and indirect costs or the number of FTOs is not provided in the claim: City of Brentwood (\$27,235), City of Claremont (\$1,372), City of Downey (\$3,815), City of Yreka (\$2,537), County of San Bernardino (\$46,414), and the County of Ventura (\$24,129)), pages 11-13.

<sup>75</sup> Exhibit D, Claims Data as of May 28, 2020 (The total cost provided is less any reported offsetting revenue or other reimbursements. Of the 2018-2019 claims, one included this information that is not provided separately here: the City of Chico reported \$990 in offsetting revenue), pages 11 and 13.

	<b>Claimant</b>	<b>1 Before 1/1/2017</b>	<b>FTO</b>	<b>2 After 1/1/2017</b>	<b>FTO</b>	<b>Indirect Costs</b>	<b>Total Cost<sup>75</sup></b>
4	CITY OF CLOVIS	\$ -	0	\$2,962	4	\$782	\$3,744
5	CITY OF FIREBAUGH	\$ -	0	\$941	2	\$284	\$1,225
6	CITY OF KERMAN	\$ -	0	\$1,273	3	\$949	\$2,222
7	CITY OF HANFORD	\$ -	0	\$894	2	\$575	\$1,469
8	CITY OF EL SEGUNDO	\$ -	0	\$3,003	3	\$1,250	\$4,253
9	CITY OF HUNTINGTON PARK	\$ -	0	\$2,701	4	\$633	\$3,334
10	CITY OF LAKEWOOD	\$ -	0	\$3,346	3	\$525	\$3,871
11	CITY OF MONROVIA	\$ -	0	\$631	1	\$449	\$1,080
12	CITY OF PALMDALE	\$ -	0	\$5,577	5	\$786	\$6,363
13	CITY OF SANTA FE SPRINGS	\$ -	0	\$781	1	\$419	\$1,200
14	CITY OF WEST COVINA	\$ -	0	\$5,920	6	\$1,480	\$7,400
15	CITY OF WEST HOLLYWOOD	\$ -	0	\$5,577	3	\$1,009	\$6,586
16	CITY OF SAN RAFAEL	\$ -	0	\$7,102	7	\$2,520	\$9,622
17	CITY OF MONTEREY	\$ -	0	\$1,788	2	\$662	\$2,450
18	TOWN OF TRUCKEE	\$ -	0	\$1,270	2	\$639	\$1,909
19	CITY OF COSTA MESA	\$ -	0	\$1,514	2	\$843	\$2,357
20	CITY OF GARDEN GROVE	\$ -	0	\$6,592	7	\$2,276	\$8,868
21	CITY OF HUNTINGTON BEACH	\$ -	0	\$1,046	1	\$120	\$1,166
22	CITY OF IRVINE	\$ -	0	\$4,838	5	\$1,930	\$6,768

	<b>Claimant</b>	<b>1 Before 1/1/2017</b>	<b>FTO</b>	<b>2 After 1/1/2017</b>	<b>FTO</b>	<b>Indirect Costs</b>	<b>Total Cost<sup>75</sup></b>
23	CITY OF LAGUNA NIGUEL	\$ -	0	\$7,167	6	\$3,002	\$10,169
24	CITY OF LAKE FOREST	\$ -	0	\$1,193	1	\$483	\$1,676
25	CITY OF NEWPORT BEACH	\$ -	0	\$1,378	2	\$496	\$1,874
26	CITY OF PLACENTIA	\$ -	0	\$2,973	5	\$801	\$3,774
27	CITY OF STANTON	\$ -	0	\$3,435	3	\$1,515	\$4,950
28	CITY OF TUSTIN	\$ -	0	\$2,048	3	\$1,567	\$3,615
29	CITY OF ROCKLIN	\$ -	0	\$1,040	1	\$556	\$1,596
30	CATHEDRAL CITY	\$ -	0	\$762	1	\$503	\$1,265
31	CITY OF DESERT HOT SPRINGS	\$ -	0	\$2,027	4	\$761	\$2,788
32	CITY OF HOLLISTER	\$ -	0	\$820	1	\$287	\$1,107
33	TOWN OF APPLE VALLEY	\$ -	0	\$1,657	2	\$987	\$2,644
34	CITY OF FONTANA	\$ -	0	\$4,142	7	\$1,075	\$5,217
35	CITY OF HESPERIA	\$ -	0	\$2,474	3	\$1,520	\$3,994
36	CITY OF RANCHO CUCAMONGA	\$ -	0	\$5,856	7	\$3,139	\$8,995
37	CITY OF REDLANDS	\$ -	0	\$3,990	5	\$948	\$4,938
38	CITY OF ENCINITAS	\$ -	0	\$8,583	10	\$5,939	\$14,522
39	CITY OF NATIONAL CITY	\$ -	0	\$5,430	7	\$1,712	\$7,142
40	CITY OF OCEANSIDE	\$ -	0	\$2,022	3	\$512	\$2,534

	<b>Claimant</b>	<b>1 Before 1/1/2017</b>	<b>FTO</b>	<b>2 After 1/1/2017</b>	<b>FTO</b>	<b>Indirect Costs</b>	<b>Total Cost<sup>75</sup></b>
41	CITY OF EL PASO DE ROBLES	\$ -	0	\$1,782	2	\$407	\$2,189
42	CITY OF SANTA BARBARA	\$ -	0	\$1,638	4	\$459	\$2,097
43	CITY OF MORGAN HILL	\$ -	0	\$2,230	3	\$724	\$2,954
44	CITY OF SANTA CLARA	\$ -	0	\$10,020	9	\$1,347	\$11,367
45	CITY OF FAIRFIELD	\$ -	0	\$1,280	2	\$408	\$1,688
46	CITY OF VACAVILLE	\$ -	0	\$3,529	4	\$858	\$4,387
47	CITY OF VALLEJO	\$ -	0	\$6,499	6	\$1,989	\$8,488
	<b>TOTAL CITY 2018-2019</b>	<b>\$ -</b>	<b>0</b>	<b>\$179,753</b>	<b>176</b>	<b>\$53,786</b>	<b>\$205,314</b>
1	COUNTY OF BUTTE	\$ -	0	\$4,344	7	\$1,993	\$6,337
2	COUNTY OF KINGS	\$ -	0	\$1,063	2	\$571	\$1,634
3	COUNTY OF LASSEN	\$ -	0	\$3,368	8	\$1,555	\$4,923
4	COUNTY OF MADERA	\$ -	0	\$6,082	13	\$3,625	\$9,707
5	COUNTY OF ORANGE	\$ -	0	\$1,846	2	\$595	\$2,441
6	COUNTY OF SACRAMENTO	\$ -	0	\$4,048	5	\$1,832	\$5,880
7	COUNTY OF SAN JOAQUIN	\$ -	0	\$1,503	2	\$448	\$1,951
8	COUNTY OF SANTA CLARA	\$ -	0	\$1,068	1	\$439	\$1,507
9	COUNTY OF SONOMA	\$ -	0	\$5,335	6	\$1,445	\$6,780
10	COUNTY OF SUTTER	\$ -	0	\$14,033	20	\$7,047	\$21,080
	<b>TOTAL COUNTY 2018-2019</b>	<b>\$ -</b>	<b>0</b>	<b>\$42,690</b>	<b>66</b>	<b>\$19,550</b>	<b>\$62,240</b>

	<b>Claimant</b>	<b>1 Before 1/1/2017</b>	<b>FTO</b>	<b>2 After 1/1/2017</b>	<b>FTO</b>	<b>Indirect Costs</b>	<b>Total Cost<sup>75</sup></b>
	<b>TOTAL 2018-2019</b>	\$ -	0	\$222,443	242	\$73,336	\$267,554

**Table 4**

FY 2016-2017 - 2018-2019 (198 of 203 claims for cities and 33 of 40 claims for counties provided FTO information)<sup>76</sup>

	<b>Claimant</b>	<b>FTO 1</b>	<b>FTO 2</b>	<b>Total FTO</b>	<b>Total Indirect Costs</b>	<b>Total Cost</b>	<b>Avg. Cost Per FTO</b>
	TOTAL CITY 2016-2017	602	540	1,142	\$403,340	\$1,295,261	\$1,134
	TOTAL CITY 2017-2018	5	275	280	\$87,295	\$308,491	\$1,102
	TOTAL CITY 2018-2019	0	176	176	\$53,786	\$205,314	\$1,167
	<b>TOTAL CITIES 2016-2017-2018-2019</b>	<b>607</b>	<b>991</b>	<b>1,598</b>	<b>\$544,421</b>	<b>\$1,809,066</b>	<b>\$1,132</b>
	TOTAL COUNTY 2016-2017	64	78	142	\$41,554	\$146,663	\$1,033
	TOTAL COUNTY 2017-2018	0	69	69	\$21,924	\$78,810	\$1,142
	TOTAL COUNTY 2018-2019	0	66	66	\$19,550	\$62,240	\$943
	<b>TOTAL COUNTIES 2016-2017-2018-2019</b>	<b>64</b>	<b>213</b>	<b>277</b>	<b>\$82,398</b>	<b>\$287,713</b>	<b>\$1,039</b>
	<b>PROGRAM TOTAL</b>	<b>671</b>	<b>1,204</b>	<b>1,875</b>	<b>\$626,819</b>	<b>\$2,096,779</b>	<b>\$1,118<sup>77</sup></b>

<sup>76</sup> Exhibit D, Claims Data as of May 28, 2020 (For purposes of calculating the costs per FTO, claims that did not clearly specify the amount claimed for activity 1., activity 2., and indirect costs or clearly specify the number of FTOs for which costs were claimed were excluded from the tables: City of Glendora, City of Buena Park, and the Town of Apple Valley (2016-2017), City of Huntington Park (2017-2018), the City of Pasadena (2017-2018), City of Chino (2017-2018), City of Brentwood (2018-2019), City of Claremont (2018-2019), City of Downey (2018-2019), and the City of Yreka (2018-2019), the County of San Bernardino (2016-2017, 2017-2018, and 2018-2019), County of Santa Barbara (2016-2017), and the County of Ventura (2016-2017, 2017-2018, 2018-2019) for a total of \$399,684).

<sup>77</sup> Since there are only 193 cities' claims and 33 counties' claims in the set of claims used to calculate costs per FTO, \$1,118 is the weighted average FTO cost claimed by all filers who clearly identified the amount claimed for activity 1., activity 2., and indirect costs and the number of FTOs trained on their claims during the initial reimbursement period.

Thus, to calculate the weighted average cost per each FTO appointed or assigned, based on the claims that specified costs for activity 1., activity 2., and indirect costs and included the number of FTOs trained, the total unaudited cost of these activities for the initial reimbursement period for cities of \$1,809,066 is divided by 1,598 FTOs identified by the claimants in 193 claims during the initial reimbursement period, to arrive at the weighted average of \$1,132 per each FTO; for counties the total unaudited cost is \$287,713 and is divided by 277 FTOs identified by the claimants in 33 claims, to arrive at the average of \$1,039 per each FTO. Therefore, the total cost to comply with activity 1., and activity 2., and indirect costs and less reported offsetting revenue for fiscal years 2016-2017, 2017-2018, 2018-2019 is \$2,096,779, with 193 claims from cities that include FTO information and 33 claims from counties that include FTO information to arrive at the weighted average cost of \$1,118 per FTO assigned.

Additionally, to calculate the weighted average indirect costs per each FTO assigned, based on the number of claims that included the number of FTOs trained, the total unaudited indirect costs claimed that includes the indirect costs for activity 1., activity 2., for the initial reimbursement period for cities the amount claimed of \$544,421 is divided by the total costs claimed of \$1,809,066, in 193 claims during the initial reimbursement period to arrive at the average indirect costs of 30 percent; for counties the total unaudited indirect cost is \$82,398 and is divided by the total costs claimed of \$287,713 in 33 claims during the initial reimbursement period to arrive at an average of 29 percent. Therefore, the total weighted average percentage of indirect costs claimed to comply with activity 1., and activity 2., for fiscal years 2016-2017, 2017-2018, 2018-2019 is 30 percent per FTO for this program during the initial reimbursement period.

Finally, to calculate the number of FTOs that have not been claimed yet the number of FTOs assumed to be included but not specified in the initial reimbursement claims that either did not specify the number of FTOs claimed or did not segregate costs by activity 1., activity 2., and indirect costs totaling \$399,684 is divided by the weighted average cost of \$1,118 representing a total of approximately 357 FTOs. Therefore, the total number of FTOs specified in the initial reimbursement claims of 1,875 is added to the unspecified estimate also included of 357 for a total number of FTOs claimed of 2,232 FTOs and subtracted from the total estimated number of FTOs during the initial reimbursement period of 5,253 the estimated number of FTOs still requiring training is 3,021 FTOs.

- *The average cost per FTO will vary based the salary rates and indirect costs of the sworn officers who are appointed or assigned.*

This estimate is based on the claims data for activity 1., activity 2., and indirect costs. It is possible that some agencies may experience higher rates of turnover than estimated, or turnover of FTOs with higher salaries than average, and others may determine that additional FTOs need to be assigned based on departmental need in excess of the .36-.5 percent rate already estimated in this document. These data are unknown.

### **Draft Proposed Statewide Cost Estimate**

On July 1, 2020, Commission staff issued the Draft Proposed Statewide Cost Estimate.<sup>78</sup> No comments were filed on the Draft Proposed Statewide Cost Estimate.

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<sup>78</sup> Exhibit E, Draft Proposed Statewide Cost Estimate.

### **Staff Recommendation**

Staff recommends that the Commission adopt this Proposed Statewide Cost Estimate of \$2,496,463 to \$5,294,316 for the initial reimbursement period of fiscal years 2016-2017, 2017-2018, and 2018-2019 and the estimated cost for fiscal year 2019-2020 and following of \$323,993 - \$1,992,536, plus the .48 percent annual growth rate and the implicit price deflator.