



25-LDM-03

October 15, 2025

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Commission on State Mandates
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RE: Legislatively Determined Mandates

- Controlled substances: Overdose Reporting.
(Senate Bill 67; Statutes 2023, Chapter 859)
- Coroners: Duties
(Assembly Bill 1859; Statutes 2024, Chapter 684)

Dear Director Stephenshaw and Executive Director Gmur:

Rural County Representatives of California (RCRC), a statewide association of California's rural counties, hereby requests to initiate a Joint Request for Legislatively Determined Mandate (LDM) pursuant to Government Code section 17573 regarding the two above-captioned statutes. RCRC is informed and believes that the statute of limitations to file a test claim for each of these statutes has not yet expired for one or more of RCRC's member counties. Due to the similarity between these provisions, we suggest combined LDM discussions, but would be pleased to discuss each of these mandates individually if that is the Department's preference.

The Department's bill analyses for both bills, dated August 15, 2023 and July 11, 2024, respectively (attached), acknowledge that each statute "likely creates a state-reimbursable mandate," and we are looking forward to working with the Department to follow the process set forth in Section 17573 to develop a Joint Request for presentation to the Legislature.

By copy of this letter to the Commission on State Mandates, RCRC requests acknowledgement that the statute of limitations to file a test claim for each of the above-captioned statutes is tolled as of the date of this notice pursuant to Government Code section 17573, subdivision (b). While this matter is pending, RCRC or the Department shall notify the Commission of actions taken as set forth below, in accordance with subdivision (g) of Section 17573:

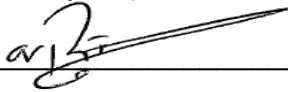
- Provide the Commission with a copy of any communications regarding development of a joint request under this section and a copy of a joint request when it is submitted to the Legislature.

- Notify the Commission of the date of (A) the Legislature's action on a joint request in the Budget Act, or (B) the Department's decision not to submit a joint request.

Please do not hesitate to contact us if you have any questions, or would like to schedule a meeting to discuss the next steps in the LDM process.

Very truly yours,

ARTHUR J. WYLENE, General Counsel
Rural County Representatives of California



DEPARTMENT OF FINANCE BILL ANALYSIS

AMENDMENT DATE: 04/24/2023
POSITION: Oppose

BILL NUMBER: SB 67
AUTHOR: Seyarto, Kelly
RELATED BILLS: AB 1351 (Haney, 2023)

BILL SUMMARY: Controlled substances: overdose reporting.

This bill requires coroners and medical examiners, no later than 72 hours after the examination of an individual, to report any death in which they determine that overdose, as defined, was a contributing factor to the Overdose Detection Mapping Application Program (ODMAP). The bill also specifies that information reported to the ODMAP by a coroner or medical examiner or shared with the ODMAP by the Emergency Medical Services Authority shall not be used for a criminal investigation or prosecution and that individuals who in good faith make a report pursuant to the bill's provisions are immune from civil or criminal liability for this action.

FISCAL SUMMARY

The Department of Public Health and the Emergency Medical Services Authority indicate no fiscal impact associated with this bill.

The Department of Finance anticipates this bill likely creates a state-reimbursable mandate of approximately \$580,000 General Fund for county coroners and medical examiners to report overdose data to the ODMAP. This assumes an average cost of \$10,000 annually for 58 counties to meet the requirements of the bill. Although county coroners and medical examiners can charge fees for services, Finance anticipates it is unlikely that the cost of the bill's reporting requirements could be fully recovered through a fee.

COMMENTS

Finance is opposed to this bill because it likely creates a state-reimbursable mandate in the hundreds of thousands of dollars and may potentially be duplicative of existing efforts of the Department of Public Health's California Overdose Surveillance Dashboard, which provides data on state and local level drug-related overdose outcomes of California, including deaths.

This bill defines overdose as a condition, including extreme physical illness, decreased level of consciousness, respiratory depression, coma, or death, resulting from the consumption or use of any controlled dangerous substance that requires medical attention, assistance, or treatment, and clinical suspicion for drug overdose, including respiratory depression, unconsciousness, or altered mental state, without other conditions to explain the clinical condition.

A related bill, AB 1351 (Haney, 2023), requires coroners and medical examiners to report quarterly to the Department of Public Health the death of any individual that is involved, or was caused by, an overdose of drugs. AB 1351 was held in the Assembly Appropriations Committee.

Analyst/Principal N. Mills/N. Hoang	Date	Program Budget Manager Dorsey, Adam	Date
Department Deputy Director		Date	
Governor's Office:	By:	Date:	Position Approved _____ Position Disapproved _____
BILL ANALYSIS		Form DF-43 (Rev 03/95 Buff)	

BILL ANALYSIS--(CONTINUED)**Form DF-43****AUTHOR****AMENDMENT DATE****BILL NUMBER**

Seyarto, Kelly

04/24/2023

SB 67

Code/Department Agency or Revenue Type	SO	(Fiscal Impact by Fiscal Year)							
	LA	(Dollars in Thousands)							
	CO	PROP					Fund		
	RV	98	FC	2023-2024	FC	2024-2025	FC	2025-2026	Code
8885/Comm St Mndt	LA	No	C	580	C	580	C	580	0001

DEPARTMENT OF FINANCE BILL ANALYSIS

AMENDMENT DATE: Original
POSITION: Oppose

BILL NUMBER: AB 1859
AUTHOR: Alanis, Juan

BILL SUMMARY: Coroners: duties.

This bill requires a county coroner to test bodily fluids extracted in an autopsy for xylazine in cases where there is suspicion of an opioid overdose or when the individual was unresponsive to overdose intervention drugs and report positive results to the Department of Public Health (DPH) and the Overdose Detection Mapping Application Program (ODMAP). This bill also requires DPH to post the number of public results on the California Overdose Surveillance Dashboard website.

FISCAL SUMMARY

DPH estimates costs of \$690,000 General Fund for the first three years, and \$200,000 annually thereafter to modify and populate the ODMAP Dashboard.

The Department of Finance anticipates this bill likely creates a state-reimbursable mandate of approximately \$580,000 General Fund for county coroners to report the presence of xylazine in an autopsy to DPH and ODMAP. This assumes an average cost of \$10,000 annually for 58 counties to meet the requirements of the bill. Although county coroners can charge fees for services, Finance anticipates it is unlikely that the cost of the bill's reporting requirements could be fully recovered through a fee.

COMMENTS

The Department of Finance is opposed to this bill because it likely creates a state-reimbursable mandate in the hundreds of thousands of dollars and creates costs not included in the 2024 Budget.

Existing law requires county coroners to investigate deaths under specific circumstances and determine the cause, including those related to drugs. Existing law requires coroners and medical examiners to report any death in which they determine that overdose was a contributing factor to ODMAP.

This bill requires a county coroner to test bodily fluids extracted in an autopsy for xylazine in cases where there is suspicion of an opioid overdose or when the individual was unresponsive to overdose intervention drugs and report positive results to DPH and the ODMAP. This bill also requires DPH to post the number of public results on the California Overdose Surveillance Dashboard website.

Analyst/Principal (713) Yap, Kaily/ Hill, Chris	Date	Program Budget Manager Calvert, Teresa	Date
Department Deputy Director		Date	
Governor's Office:	By:	Date:	Position Approved _____ Position Disapproved _____
BILL ANALYSIS		Form DF-43 (Rev 03/95 Buff)	

BILL ANALYSIS--(CONTINUED)**Form DF-43****AUTHOR****AMENDMENT DATE****BILL NUMBER**

Alanis, Juan

AB 1859

Code/Department Agency or Revenue Type	SO	(Fiscal Impact by Fiscal Year)						
	LA	(Dollars in Thousands)						
	CO	PROP						
	RV	98	FC	2024-2025	FC	2025-2026	FC	Fund 2026-2027 Code
4265/PublicHealth	SO	No	C	230	C	230	C	230 0001
8885/Comm St Mndt	LA	No	C	580	C	580	C	580 0001

DECLARATION OF SERVICE BY EMAIL

I, the undersigned, declare as follows:

I am a resident of the County of Sacramento and I am over the age of 18 years, and not a party to the within action. My place of employment is 980 Ninth Street, Suite 300, Sacramento, California 95814.

On October 22, 2025, I served the:

- **Current Mailing List dated October 22, 2025**
- **Notice of Receipt of Letter of Intent to Initiate a Joint Request for a Legislatively Determined Mandate and Tolling of the Statute of Limitations issued October 22, 2025**
- **Letter of Intent to Initiate a Joint Request for a Legislatively Determined Mandate filed by the Rural County Representatives of California (RCRC) filed October 15, 2025**

Controlled Substances: Overdose Reporting
Statutes 2023, Chapter 859 (SB 67)

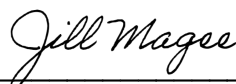
And

Coroners: Duties, 25-LDM-03
Statutes 2024, Chapter 684 (AB 1859)

Rural County Representatives of California, Requester

by making it available on the Commission's website and providing notice of how to locate it to the email addresses provided on the attached mailing list.

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 October 22, 2025 at Sacramento, California.



Jill Magee
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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 10/22/25

Claim Number: 25-LDM-03

Matter: Controlled Substances: Overdose Reporting and Coroners: Duties

Requester: Rural County Representatives of California

TO ALL PARTIES, INTERESTED PARTIES, AND INTERESTED PERSONS:

Each commission mailing list is continuously updated as requests are received to include or remove any party or person on the mailing list. A current mailing list is provided with commission correspondence, and a copy of the current mailing list is available upon request at any time. Except as provided otherwise by commission rule, when a party or interested party files any written material with the commission concerning a claim, it shall simultaneously serve a copy of the written material on the parties and interested parties to the claim identified on the mailing list provided by the commission. (Cal. Code Regs., tit. 2, § 1181.3.)

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