



August 27, 2026

Mr. Chris Hill
Department of Finance
915 L Street, 8th Floor
Sacramento, CA 95814

Mr. Rajiv Narayan
Office of the County Counsel
County of Santa Clara
70 West Hedding Street
San Jose, CA 95110

Ms. Margaret Olaiya
County of Santa Clara
70 West Hedding Street
San Jose, CA 95110

And Parties, Interested Parties, and Interested Persons (See Mailing List)

**Re: Second Notice of Complete Test Claim, Schedule for Comments, and
Notice of Tentative Hearing Date**

CARE Act County Legal Counsel, 25-TC-02

Welfare & Institutions Code Sections 5970-5987, as added and amended by
Statutes 2022, Chapter 319 (SB 1338); Statutes 2023, Chapter 283 (SB 35);
Statutes 2023, Chapter 640 (SB 42); Statutes 2024, Chapter 647 (SB 1400);
Statutes 2024, Chapter 646 (SB 1323); and Statutes 2025, Chapter 528 (SB 27)
County of Santa Clara, Claimant

Dear Mr. Hill, Mr. Narayan, and Ms. Olaiya:

On February 9, 2026, the County of Santa Clara (claimant) filed the above-captioned Test Claim. Upon review, Commission staff found the Test Claim to be complete.

On March 10, 2026, Commission staff issued the Notice of Complete Test Claim, Schedule for Comments, and Notice of Tentative Hearing Date on the above-captioned matter based upon the pleading of Statutes 2022, Chapter 319 (SB 1338); Statutes 2023, Chapter 283 (SB 35); Statutes 2023, Chapter 640 (SB 42); Statutes 2024, Chapter 647 (SB 1400); Statutes 2024, Chapter 646 (SB 1323); Statutes 2025, Chapter 528 (SB 27); Welf. & Inst. Code, § 5977(b)(4); (b)(7)(A); (c)(2); Welf. & Inst. Code, § 5977.1(a)(1); (a)(4); (c)(3)(A); (d)(2), (3), (5); Welf. & Inst. Code, § 5977.2(a)(1); Welf. & Inst. Code, § 5977.3(a)(1); Welf. & Inst. Code, § 5977.4(d); Welf. & Inst. Code, § 5978.1(c).

Pursuant to additional legal review, Commission staff found that the Test Claim limited the County's pleading to Welfare and Institutions Code sections 5977(b)(4), (b)(7)(A), (c)(2); 5977.1(a)(1), (a)(4), (c)(3)(A), (d)(2), (3), (5); 5977.2(a)(1); 5977.3(a)(1); 5977.4(d); and 5978.1(c) but the Test Claim alleged costs associated with other subdivisions which had not been pleaded. Government Code section 17553(b) requires a test claim to identify "the specific sections of statutes." On August 3, 2026, Commission staff issued the Request for Clarification of Pleading and Notice of Incomplete Test Claim wherein Commission staff suggested the Test Claim clearly state that, identify all activities and costs alleged to impose the state-mandated program, and plead Welfare and Institutions Code sections 5970-5987 (which are the specific sections of the following statutes and chapters that make up the CARE Act), as added and amended by Statute 2022, chapter 319; Statute 2023, chapter 283; Statute 2023, chapter 640; Statute 2024, chapter 647; Statute 2024, chapter 646; and Statute 2025, chapter 528. In the alternative, Commission staff requested that if the County intended to limit its Test Claim just to the code sections and subdivisions listed in the caption, to please provide that clarification.

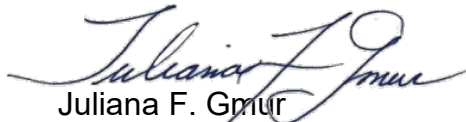
On August 18, 2026, the claimant filed documents to cure the Test Claim. Specifically, the claimant filed a revised Test Claim Form, Narrative, and Declarations from Megan Wheelehan and Hilary Kerrigan. Upon review, Commission staff finds this Test Claim to be complete and retains the original filing date of February 9, 2026, in accordance with section 1183.1(f) of the Commission's regulations (California Code of Regulations, Title 2).¹

As this revised Test Claim only corrects technical pleading issues, does not make substantive changes, and the filed comments address the CARE Act in its entirety, the Commission is not requesting further comment.

Tentative Hearing Date

The public hearing on this claim remains tentatively scheduled for **February 12, 2027**. The Draft Proposed Decision will be issued for comment at least eight weeks prior to the public hearing.

Very truly yours,



Juliana F. Gmur
Executive Director

¹ A test claim shall be submitted on or before June 30 following a fiscal year in order to establish eligibility for reimbursement for that fiscal year. The claimant may thereafter amend the test claim at any time, but before the test claim is set for a hearing, without affecting the original filing date as long as the amendment substantially relates to the original test claim (Government Code section 17557(e)).

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 August 27, 2026, I served the:

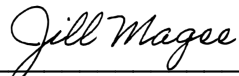
- **Current Mailing List dated July 29, 2026**
- **Second Notice of Complete Test Claim, Schedule for Comments, and Notice of Tentative Hearing Date issued August 27, 2026**
- **Response to Request for Clarification of Pleading and Second Notice of Incomplete Test Claim filed August 18, 2026**
- **Test Claim filed by the County of Santa Clara (claimant) on February 9, 2026 revised on August 18, 2026**

CARE Act County Legal Counsel, 25-TC-02

Welfare & Institutions Code Sections 5970-5987, as added and amended by Statutes 2022, Chapter 319 (SB 1338); Statutes 2023, Chapter 283 (SB 35); Statutes 2023, Chapter 640 (SB 42); Statutes 2024, Chapter 647 (SB 1400); Statutes 2024, Chapter 646 (SB 1323); and Statutes 2025, Chapter 528 (SB 27)
County of Santa Clara, Claimant

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 August 27, 2026 at Sacramento, California.



Jill Magee
Commission on State Mandates
980 Ninth Street, Suite 300
Sacramento, CA 95814
(916) 323-3562

COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 7/29/26

Claim Number: 25-TC-02

Matter: CARE Act County Legal Counsel

Claimant: County of Santa Clara

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.)

Adaoha Agu, *County of San Diego Auditor & Controller Department*

Projects, Revenue and Grants Accounting, 5530 Overland Avenue, Ste. 410 , MS:O-53, San Diego, CA 92123

Phone: (858) 694-2129

Adaoha.Agu@sdcounty.ca.gov

Rachelle Anema, Assistant Auditor-Controller, *County of Los Angeles*

Accounting Division, 500 W. Temple Street, Los Angeles, CA 90012

Phone: (213) 974-8321

RANEMA@auditor.lacounty.gov

Lili Apgar, Specialist, *State Controller's Office*

Local Reimbursements Section, 3301 C Street, Suite 740, Sacramento, CA 95816

Phone: (916) 324-0254

lapgar@sco.ca.gov

Socorro Aquino, *State Controller's Office*

Division of Audits, 3301 C Street, Suite 700, Sacramento, CA 95816

Phone: (916) 322-7522

SAquino@sco.ca.gov

Aaron Avery, Legislative Representative, *California Special Districts Association*

1112 I Street Bridge, Suite 200, Sacramento, CA 95814

Phone: (916) 442-7887

Aarona@csda.net

David Bass, Vice Mayor, *City of Rocklin*

3970 Rocklin Road, Rocklin, CA 95677

Phone: (916) 663-8504

David.Bass@rocklin.ca.us

Michael Beaton, Assistant County Administrative Officer, *County of Monterey*
County Administrative Office, 168 W. Alisal Street, 3rd Floor, Salinas, CA 93901
Phone: (831) 755-3835
beatonm@countyofmonterey.gov

Ginni Bella Navarre, Deputy Legislative Analyst, *Legislative Analyst's Office*
925 L Street, Suite 1000, Sacramento, CA 95814
Phone: (916) 319-8342
Ginni.Bella@lao.ca.gov

Guy Burdick, Consultant, *MGT Consulting*
2251 Harvard Street, Suite 134, Sacramento, CA 95815
Phone: (916) 833-7775
gburdick@mgtconsulting.com

Allan Burdick,
7525 Myrtle Vista Avenue, Sacramento, CA 95831
Phone: (916) 203-3608
allanburdick@gmail.com

Rica Mae Cabigas, Chief Accountant, *Auditor-Controller*
Accounting Division, 500 West Temple Street, Los Angeles, CA 90012
Phone: (213) 974-8309
rcabigas@auditor.lacounty.gov

Evelyn Calderon-Yee, Bureau Chief, *State Controller's Office*
Local Government Programs and Services Division, Bureau of Payments, 3301 C Street, Suite 740,
Sacramento, CA 95816
Phone: (916) 324-5919
ECalderonYee@sco.ca.gov

Julissa Ceja Cardenas, Legislative Analyst, *California State Association of Counties (CSAC)*
Government Finance and Administration, 1100 K Street, Suite 101, Sacramento, CA 95814
Phone: (916) 327-7500
jcejacardenas@counties.org

Kate Chatfield, Executive Director, *California Public Defenders Association*
10324 Placer Lane, Sacramento, CA 95827
Phone: (916) 362-1686
katechatfield@cpda.org

Ali Chemkhi, Senior Supervising Accountant/Auditor, *County of San Bernardino*
Office of Auditor-Controller, 268 West Hospitality Lane, Fourth Floor, San Bernardino, CA 92415-0018
Phone: (909) 382-7035
ali.chemkhi@sbcountyatc.gov

Annette Chinn, Consultant, *Cost Recovery Systems, Inc.*
705-2 East Bidwell Street, #294, Folsom, CA 95630
Phone: (916) 939-7901
achinnrcs@aol.com

Carolyn Chu, Senior Fiscal and Policy Analyst, *Legislative Analyst's Office*
925 L Street, Suite 1000, Sacramento, CA 95814
Phone: (916) 319-8326
Carolyn.Chu@lao.ca.gov

Oana Cosma, Budget and Finance Director, *County of Orange*
400 W. Civic Center Dr., 5th Floor, Santa Ana, CA 92701-4062
Phone: (714) 834-7410
Oana.Cosma@ceo.oc.gov

Thomas Deak, Senior Deputy, *County of San Diego*
Office of County Counsel, 1600 Pacific Highway, Room 355, San Diego, CA 92101
Phone: (619) 531-4810
Thomas.Deak@sdcounty.ca.gov

Kevin Fisher, Assistant City Attorney, *City of San Jose*
Environmental Services, 200 East Santa Clara Street, 16th Floor, San Jose, CA 95113
Phone: (408) 535-1987
kevin.fisher@sanjoseca.gov

Tim Flanagan, CIO-Registrar of Voters, *County of Solano*
Registrar of Voters, 678 Texas Street, Suite 2600, Fairfield, CA 94533
Phone: (707) 784-3359
Elections@solanocounty.com

Juliana Gmur, Executive Director, *Commission on State Mandates*
980 9th Street, Suite 300, Sacramento, CA 95814
Phone: (916) 323-3562
juliana.gmur@csm.ca.gov

Chris Hill, Principal Program Budget Analyst, *Department of Finance*
Local Government Unit, 915 L Street, 8th Floor, Sacramento, CA 95814
Phone: (916) 445-3274
Chris.Hill@dof.ca.gov

Tiffany Hoang, Associate Accounting Analyst, *State Controller's Office*
Local Government Programs and Services Division, Bureau of Payments, 3301 C Street, Suite 740, Sacramento, CA 95816
Phone: (916) 323-1127
THoang@sco.ca.gov

Ken Howell, Senior Management Auditor, *State Controller's Office*
Audits, Compliance Audits Bureau, 3301 C Street, Suite 725A, Sacramento, CA 95816
Phone: (916) 323-2368
KHowell@sco.ca.gov

Jason Jennings, Director, *Maximus Consulting*
Financial Services, 808 Moorefield Park Drive, Suite 205, Richmond, VA 23236
Phone: (804) 323-3535
SB90@maximus.com

Angelo Joseph, Supervisor, *State Controller's Office*
Local Government Programs and Services Division, Bureau of Payments, 3301 C Street, Suite 740, Sacramento, CA 95816
Phone: (916) 323-0706
AJoseph@sco.ca.gov

Emma Jungwirth, Senior Legislative Advocate, *California State Association of Counties (CSAC)*
1100 K Street, Ste 101, Sacramento, CA 95814
Phone: (916) 650-8115
ejungwirth@counties.org

Anne Kato, Acting Chief, *State Controller's Office*

Local Government Programs and Services Division, 3301 C Street, Suite 740, Sacramento, CA 95816

Phone: (916) 322-9891

akato@sco.ca.gov

Anita Kerezsi, Principal Consultant, *AK & Company*

2425 Golden Hill Road, Suite 106, Paso Robles, CA 93446

Phone: (805) 239-7994

akcompanysb90@gmail.com

Joanne Kessler, Fiscal Specialist, *City of Newport Beach*

Revenue Division, 100 Civic Center Drive, Newport Beach, CA 90266

Phone: (949) 644-3199

jkessler@newportbeachca.gov

Daniel Kigel, Finance Manager II, *County of Monterey*

Administration and Finance, County Administrative Office (CAO), 168 W. Alisal Street, 3rd Floor (Room 35048), Salinas, CA 93901

Phone: (831) 755-5119

KigelD@countyofmonterey.gov

Lisa Kurokawa, Bureau Chief for Audits, *State Controller's Office*

Compliance Audits Bureau, 3301 C Street, Suite 700, Sacramento, CA 95816

Phone: (916) 327-3138

lkurokawa@sco.ca.gov

Government Law Intake, *Department of Justice*

Attorney General's Office, 1300 I Street, Suite 125, PO Box 944255, Sacramento, CA 94244-2550

Phone: (916) 210-6046

governmentlawintake@doj.ca.gov

Eric Lawyer, Legislative Advocate, *California State Association of Counties (CSAC)*

Government Finance and Administration, 1100 K Street, Suite 101, Sacramento, CA 95814

Phone: (916) 650-8112

elawyer@counties.org

Kim-Anh Le, Deputy Controller, *County of San Mateo*

555 County Center, 4th Floor, Redwood City, CA 94063

Phone: (650) 599-1104

kle@smcgov.org

William Lee, Chief Deputy District Attorney, *County of San Bernardino District Attorney's Office*

303 W. 3rd Street, San Bernardino, CA 92415-0502

Phone: (909) 382-3800

WLee@sbcda.org

Fernando Lemus, Principal Accountant - Auditor, *County of Los Angeles*

Auditor-Controller's Office, 500 West Temple Street, Room 603, Los Angeles, CA 90012

Phone: (213) 974-0324

flemus@auditor.lacounty.gov

Erika Li, Chief Deputy Director, *Department of Finance*

915 L Street, 10th Floor, Sacramento, CA 95814

Phone: (916) 445-3274

erika.li@dof.ca.gov

Kenneth Louie, Chief Counsel , *Department of Finance*

915 L. Street, Sacramento, CA 95814

Phone: (916) 322-0971

Kenny.Louie@dof.ca.gov

Everett Luc, Accounting Administrator I, Specialist, *State Controller's Office*

3301 C Street, Suite 740, Sacramento, CA 95816

Phone: (916) 323-0766

ELuc@sco.ca.gov

Jill Magee, Program Analyst, *Commission on State Mandates*

980 9th Street, Suite 300, Sacramento, CA 95814

Phone: (916) 323-3562

Jill.Magee@csm.ca.gov

Suresh Malkani, Finance Director, *Town of Apple Valley*

14955 Dale Evans Parkway, Apple Valley, CA 92307

Phone: (760) 240-7000

smalkani@applevalley.org

Darryl Mar, Manager, *State Controller's Office*

Local Reimbursements Section, 3301 C Street, Suite 740, Sacramento, CA 95816

Phone: (916) 323-0706

DMar@sco.ca.gov

Graciela Martinez, President, *California Public Defenders Association*

10324 Placer Lane, Sacramento, CA 95827

Phone: (916) 362-1686

gmartinez@pubdef.lacounty.gov

Michelle Mendoza, Business Engineer Lead and Senior Manager, *MAXIMUS*

17310 Red Hill Avenue, Suite 340, Irvine, CA 95403

Phone: (949) 440-0845

michellemendoza@maximus.com

Rajiv Narayan, Deputy County Counsel, *County of Santa Clara***Claimant Representative**

Office of the County Counsel, 70 West Hedding Street, East Wing, 9th Floor, San Jose, CA 95110

Phone: (669) 786-4287

rajiv.narayan@cco.sccgov.org

Adam Nguyen, Finance Director, *County of Contra Costa*

1025 Escobar Street, 4th Floor, Martinez, CA 94553

Phone: (925) 655-2048

adam.nguyen@cao.cccounty.us

Rosanna Nguyen, Program Budget Manager, *Department of Finance*

Local Government Unit, 915 L. Street, Sacramento, CA 95814

Phone: (916) 445-3274

Rosanna.Nguyen@dof.ca.gov

Andy Nichols, Consultant, *Nichols Consulting*

1857 44th Street, Sacramento, CA 95819

Phone: (916) 455-3939

andy@nichols-consulting.com

Margaret Olaiya, Director of Finance, *County of Santa Clara***Claimant Contact**

70 West Hedding Street, East Wing, 2nd Floor, San Jose, CA 95110

Phone: (408) 299-5201

Margaret.Olaiya@fin.sccgov.org

Jamie Ostroff, Chief Legal Officer and General Counsel, *California Medical Association*

1201 K Street, Suite #800, Sacramento, CA 95814

Phone: (800) 786-4262

memberservice@cmadocs.org

Patricia Pacot, Accountant Auditor I, *County of Colusa*

Office of Auditor-Controller, 546 Jay Street, Suite #202, Colusa, CA 95932

Phone: (530) 458-0424

ppacot@countyofcolusa.org

Arthur Palkowitz, Attorney, *Law Offices of Arthur M. Palkowitz*

12807 Calle de la Siena, San Diego, CA 92130

Phone: (858) 259-1055

law@artpalk.onmicrosoft.com

Kirsten Pangilinan, Specialist, *State Controller's Office*

Local Reimbursements Section, 3301 C Street, Suite 740, Sacramento, CA 95816

Phone: (916) 322-2446

KPangilinan@sco.ca.gov

Trevor Power, Accounting Manager, *City of Newport Beach*

100 Civic Center Drive, Newport Beach, CA 92660

Phone: (949) 644-3085

tpower@newportbeachca.gov

Jonathan Quan, Associate Accountant, *County of San Diego*

Projects, Revenue, and Grants Accounting, 5530 Overland Ave, Suite 410, San Diego, CA 92123

Phone: 6198768518

Jonathan.Quan@sdcounty.ca.gov

Roberta Raper, Director of Finance, *City of West Sacramento*

1110 West Capitol Ave, West Sacramento, CA 95691

Phone: (916) 617-4509

robertar@cityofwestsacramento.org

Chad Rinde, Director of Finance, *County of Sacramento*

700 H Street, Room 3650, Sacramento, CA 95814

Phone: (916) 874-7248

RindeC@SacCounty.gov

Jessica Sankus, Senior Legislative Analyst, *California State Association of Counties (CSAC)*

Government Finance and Administration, 1100 K Street, Suite 101, Sacramento, CA 95814

Phone: (916) 327-7500

jsankus@counties.org

Angie Schwartz, Deputy Director, *Department of Social Services*

Children and Family Services, 744 P Street, MS 8-17-18, Sacramento, CA 95814

Phone: (916) 657-2614

Angie.Schwartz@dss.ca.gov

Cindy Sconce, Director, *Government Consulting Partners*

5016 Brower Court, Granite Bay, CA 95746

Phone: (916) 276-8807

cindysconcecp@gmail.com

Carla Shelton, Senior Legal Analyst, *Commission on State Mandates*
980 9th Street, Suite 300, Sacramento, CA 95814
Phone: (916) 323-3562
carla.shelton@csm.ca.gov

Camille Shelton, Chief Legal Counsel, *Commission on State Mandates*
980 9th Street, Suite 300, Sacramento, CA 95814
Phone: (916) 323-3562
camille.shelton@csm.ca.gov

Paul Steenhausen, Principal Fiscal and Policy Analyst, *Legislative Analyst's Office*
925 L Street, Suite 1000, , Sacramento, CA 95814
Phone: (916) 319-8303
Paul.Steenhausen@lao.ca.gov

Kim Stone, Legislation, *California District Attorneys Association*
2495 Natomas Park Drive, Suite 575, Sacramento, CA 95833
Phone: (916) 443-2017
kim@stoneadvocacy.com

David Swanson Hollinger, Chief Deputy Director, *Department of Social Services*
Executive , 744 P Street MS 8-17-11, Sacramento, CA 95814
Phone: (916) 657-2598
David.Swansonhollinger@dss.ca.gov

Jolene Tollenaar, Consultant, *MGT Consulting Group*
2251 Harvard Street, Suite 134, Sacramento, CA 95815
Phone: (916) 243-8913
jolenetollenaar@gmail.com

Gregory Totten, Chief Executive Officer, *California District Attorneys Association*
2495 Natomas Park Drive, Suite 575, Sacramento, CA 95833
Phone: (916) 443-2017
gtotten@cdaa.org

Jessica Uzarski, Consultant, *Senate Budget and Fiscal Review Committee*
1020 N Street, Room 502, Sacramento, CA 95814
Phone: (916) 651-4103
Jessica.Uzarski@sen.ca.gov

Alejandra Villalobos, Management Services Manager, *County of San Bernardino*
Office of Auditor-Controller, 222 West Hospitality Lane, Forth Floor, San Bernardino, CA 92415
Phone: (909) 382-3191
alejandra.villalobos@sbcountyatc.gov

Joshua Walden, Deputy County Counsel, *County of Santa Clara*
Office of the County Counsel, 70 West Hedding Street, 9th Floor, San Jose, CA 95110
Phone: (408) 229-9052
joshua.walden@cco.sccgov.org

Tiffany Walston, County Counsel, *County of Los Angeles*
648 Kenneth Hahn Hall of Administration, 500 West Temple Street, Los Angeles, CA 90012-2713
Phone: (213) 974-1811
twalston@counsel.lacounty.gov

Renee Wellhouse, President, *David Wellhouse & Associates, Inc.*
3609 Bradshaw Road, H-382, Sacramento, CA 95927

Phone: (916) 797-4883
renee@wellhouseassociates.com

Adam Whelen, Director of Public Works, *City of Anderson*
1887 Howard St., Anderson, CA 96007
Phone: (530) 378-6640
awhelen@ci.anderson.ca.us

Arthur Wylene, General Counsel, *Rural County Representatives of California (RCRC)*
1215 K Street, Suite 1650, Sacramento, CA 95814
Phone: (916) 447-4806
awylene@rcrcnet.org

Elisa Wynne, Staff Director, *Senate Budget & Fiscal Review Committee*
California State Senate, State Capitol Room 5019, Sacramento, CA 95814
Phone: (916) 651-4103
elisa.wynne@sen.ca.gov

Kaily Yap, Budget Analyst, *Department of Finance*
Local Government Unit, 915 L Street, Sacramento, CA 95814
Phone: (916) 445-3274
Kaily.Yap@dof.ca.gov

Siew-Chin Yeong, Director of Public Works, *City of Pleasanton*
3333 Busch Road, Pleasanton, CA 94566
Phone: (925) 931-5506
syeong@cityofpleasantonca.gov

Traci Young, IS Project Director, *City and County of San Francisco*
San Francisco Public Utilities Commission (SFPUC), 525 Golden Gate Ave, San Francisco, CA 94102
Phone: (415) 653-2583
tmyoung@sfwater.org

Jess Zayas, Bureau Manager, *Department of Social Services*
Finance & Accounting, 744 P Street MS 17-27, Sacramento, CA 95814
Phone: (916) 654-0958
Jess.Zayas@dss.ca.gov

Helmholt Zinser-Watkins, Associate Governmental Program Analyst, *State Controller's Office*
Local Government Programs and Services Division, Bureau of Payments, 3301 C Street, Suite 700, Sacramento, CA 95816
Phone: (916) 324-7876
HZinser-watkins@sco.ca.gov