SixTen and Associates **Mandate Reimbursement Services**

KEITH B. PETERSEN, MPA, JD, President 5252 Balboa Avenue, Suite 807 San Diego, CA 92117

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June 14, 2006

Paula Higashi, Executive Director Commission on State Mandates 980 Ninth Street, Suite 300 Sacramento, CA 95814

RECEIVED JUN 1 6 2006

COMMISSION ON

RE:

Incorrect Reduction Claim of Santa Monica Community College District

1/84 Health Fee Elimination

Fiscal Years: 2001-02, and 2002-03

Dear Ms. Higashi:

Enclosed is the original and two copies of the above referenced incorrect reduction claim for Santa Monica Community College District.

SixTen and Associates has been appointed by the District as its representative for this matter and all interested parties should direct their inquiries to me, with a copy as follows:

Thomas J. Donner, Executive Vice President **Business and Administration** Santa Monica Community College District 1900 Pico Blvd. Santa Monica, CA 90405

Thank-you.

Sincerely,

Keith B. Petersen

State of California COMMISSION ON STATE MANDATES 980 Ninth Street, Suite 300 Sacramento, CA 95814 (916) 323-3562 CSM 2 (12/89)

JUN 1 6 2006 COMMISSION ON STATE MANDATES

INCORRECT REDUCTION CLAIM FORM

Claim No. 05-4206-I-12

Local Agency or School District Submitting Claim

SANTA MONICA COMMUNITY COLLEGE DISTRICT

Contact Person

Telephone Number

Keith B. Petersen, President SixTen and Associates

Voice: 858-514-8605 Fax: 858-514-8645

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San Diego, CA 92117

Address

Thomas J. Donner, Executive Vice President Business and Administration
Santa Monica Community College District
1900 Pico Blvd.
Santa Monica, CA 90405

Representative Organization to be Notified

Telephone Number

Robert Miyashiro, Consultant, Education Mandated Cost Network

Voice: 916-446-7517 Fax: 916-446-2011

c/o School Services of California 1121 L Street, Suite 1060

E-mail: robertm@SSCal.com

Sacramento, CA 95814

This claim alleges an incorrect reduction of a reimbursement claim filed with the State Controller's Office pursuant to section 17561 of the Government Code. This incorrect reduction claim is filed pursuant to section 17561(b) of the Government Code.

CLAIM IDENTIFICATION: Specify Statute or Executive Order

HEALTH FEE ELIMINATION Chapter 1, Statutes of 1984, 2nd E.S. Chapter 1118, Statutes of 1987

Fiscal Year

Amount of the Incorrect Reduction

2001-2002

\$198.795

2002-2003

\$165,612

Total Amount

\$364,407

IMPORTANT: PLEASE SEE INSTRUCTIONS AND FILING REQUIREMENTS FOR COMPLETING AN INCORRECT REDUCTION CLAIM ON THE REVERSE SIDE.

Name and Title of Authorized Representative

Telephone No.

Thomas J. Donner, Executive Vice President

Voice: 310-434-4200

Eav. 31

310-434-4386

E-Mail: DONNER THOMAS@smc.edu

Signature of Authorized Representative

Date

June 12, 2006

x Momas House

1 2 3 4 5 6 7	Claim Prepared by: Keith B. Petersen SixTen and Associates 5252 Balboa Avenue, Suite 807 San Diego, California 92117 Voice: (858) 514-8605 Fax: (858) 514-8645				
8					
9	BEF	ORE THE			
10	COMMISSION O	N STATE MANDATES			
11	STATE OF CALIFORNIA				
12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	INCORRECT REDUCTION CLAIM OF:) SANTA MONICA Community College District,) Claimant.	No. CSM Chapter 1, Statutes of 1984, 2nd E.S. Chapter 1118, Statutes of 1987 Education Code Section 76355 Health Fee Elimination Annual Reimbursement Claims: Fiscal Year 2001-02 Fiscal Year 2002-03			
28 29		INCORRECT REDUCTION CLAIM FILING			
30	PART I. AUTHOR	RITY FOR THE CLAIM			
31	The Commission on State Mandate	es has the authority pursuant to Government			
32	Code Section 17551(d) to " to hear and decide upon a claim by a local agency or				
33	school district, filed on or after January 1, 1985, that the Controller has incorrectly				
34	reduced payments to the local agency or	school district pursuant to paragraph (2) of			

the Commission.

subdivision (d) of Section 17561." Santa Monica Community College District (hereafter "District") is a school district as defined in Government Code Section 17519. Title 2, CCR, Section 1185 (a), requires the claimant to file an incorrect reduction claim with

This incorrect reduction claim is timely filed. Title 2, CCR, Section 1185 (b), requires incorrect reduction claims to be filed no later than three years following the date of the Controller's remittance advice notifying the claimant of a reduction. A Controller's audit report dated March 17, 2006 (as revised April 19, 2006), has been issued. The audit report constitutes a demand for repayment and adjudication of the claims.

There is no alternative dispute resolution process available from the Controller's office. In response to an audit issued March 10, 2004, Foothill-De Anza Community College attempted to utilize the informal audit review process established by the Controller to resolve factual disputes. Foothill-De Anza was notified by the Controller's legal counsel by letter of July 15, 2004 (attached as Exhibit "A"), that the Controller's informal audit review process was not available for mandate audits and that the proper forum was the Commission on State Mandates.

PART II. SUMMARY OF THE CLAIM

The Controller conducted a field audit of the District's annual reimbursement claims for the costs of complying with the legislatively mandated Health Fee Elimination program for the period of July 1, 2001 through June 30, 2003. As a result of the audit,

the Controller determined that \$364,407 of the claimed costs are unallowable:

2 3 4	Fiscal <u>Year</u>	Amount <u>Claimed</u>	Audit <u>Adjustment</u>	SCO <u>Payments</u>	Amount Due <state> District</state>
5	2001-02	\$198,795	\$198,795	\$31,295	<\$31,295>
6	2002-03	<u>\$165,612</u>	<u>\$165,612</u>	<u>\$ 0</u>	<u>\$ 0</u>
7	Totals	\$364,407	\$364,407	\$31,295	<\$31,295>

Since the District has been paid \$31,295 for these claims, the audit report concludes that the entire amount is payable to the state.

PART III. PREVIOUS INCORRECT REDUCTION CLAIMS

The District has not filed any previous incorrect reduction claims for this mandate program. The District is not aware of any other incorrect reduction claims having been adjudicated on the specific issues or subject matter raised by this incorrect reduction claim.

PART IV. BASIS FOR REIMBURSEMENT

1. Mandate Legislation

Chapter 1, Statutes of 1984, 2nd Extraordinary Session, repealed Education

Code Section 72246 which had authorized community college districts to charge a

student health services fee for the purpose of providing student health supervision and
services, direct and indirect medical and hospitalization services, and operation of
student health centers. This statute also required the scope of student health services
for which a community college district charged a fee during the 1983-84 fiscal year be

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1 maintained at that level thereafter. The provisions of this statute were to automatically 2 repeal on December 31, 1987.

Chapter 1118, Statutes of 1987, amended Education Code Section 72246 to require any community college district that provided student health services in 1986-87 to maintain student health services at that level each fiscal year thereafter.

Chapter 8, Statutes of 1993, Section 29, repealed Education Code Section 72246, effective April 15, 1993. Chapter 8, Statutes of 1993, Section 34, added Education Code Section 76355¹, containing substantially the same provisions as former

The governing board of each community college district may increase this fee by the same percentage increase as the Implicit Price Deflator for State and Local Government Purchase of Goods and Services. Whenever that calculation produces an increase of one dollar (\$1) above the existing fee, the fee may be increased by one dollar (\$1).

- (b) If, pursuant to this section, a fee is required, the governing board of the district shall decide the amount of the fee, if any, that a part-time student is required to pay. The governing board may decide whether the fee shall be mandatory or optional.
- (c) The governing board of a district maintaining a community college shall adopt rules and regulations that exempt the following students from any fee required pursuant to subdivision (a):
 - (1) Students who depend exclusively upon prayer for healing in accordance with the teachings of a bona fide religious sect, denomination, or organization.

¹ Education Code Section 76355, added by Chapter 8, Statutes of 1993, Section 34, effective April 15, 1993, as last amended by Chapter 758, Statutes of 1995, Section 99:

[&]quot;(a) The governing board of a district maintaining a community college may require community college students to pay a fee in the total amount of not more than ten dollars (\$10) for each semester, seven dollars (\$7) for summer school, seven dollars (\$7) for each intersession of at least four weeks, or seven dollars (\$7) for each quarter for health supervision and services, including direct or indirect medical and hospitalization services, or the operation of a student health center or centers, or both.

1 Section 72246, effective April 15, 1993.

2. <u>Test Claim</u>

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On December 2,1985, Rio Hondo Community College District filed a test claim alleging that Chapter 1, Statutes of 1984, 2nd Extraordinary Session, by eliminating the authority to levy a fee and by requiring a maintenance of effort, mandated increased

Authorized expenditures shall not include, among other things, athletic trainers' salaries, athletic insurance, medical supplies for athletics, physical examinations for intercollegiate athletics, ambulance services, the salaries of health professionals for athletic events, any deductible portion of accident claims filed for athletic team members, or any other expense that is not available to all students. No student shall be denied a service supported by student health fees on account of participation in athletic programs.

- (e) Any community college district that provided health services in the 1986-87 fiscal year shall maintain health services, at the level provided during the 1986-87 fiscal year, and each fiscal year thereafter. If the cost to maintain that level of service exceeds the limits specified in subdivision (a), the excess cost shall be borne by the district.
- (f) A district that begins charging a health fee may use funds for startup costs from other district funds and may recover all or part of those funds from health fees collected within the first five years following the commencement of charging the fee.
- (g) The board of governors shall adopt regulations that generally describe the types of health services included in the health service program."

⁽²⁾ Students who are attending a community college under an approved apprenticeship training program.

⁽³⁾ Low-income students, including students who demonstrate financial need in accordance with the methodology set forth in federal law or regulation for determining the expected family contribution of students seeking financial aid and students who demonstrate eligibility according to income standards established by the board of governors and contained in Section 58620 of Title 5 of the California Code of Regulations.

⁽d) All fees collected pursuant to this section shall be deposited in the fund of the district designated by the California Community Colleges Budget and Accounting Manual. These fees shall be expended only to provide health services as specified in regulations adopted by the board of governors.

1 costs by mandating a new program or the higher level of service of an existing program
2 within the meaning of California Constitution Article XIII B, Section 6.

On November 20, 1986, the Commission on State Mandates determined that Chapter 1, Statutes of 1984, 2nd Extraordinary Session, imposed a new program upon community college districts by requiring any community college district, which provided student health services for which it was authorized to charge a fee pursuant to former Section 72246 in the 1983-1984 fiscal year, to maintain student health services at that level in the 1984-1985 fiscal year and each fiscal year thereafter.

At a hearing on April 27, 1989, the Commission of State Mandates determined that Chapter 1118, Statutes of 1987, amended this maintenance of effort requirement to apply to all community college districts which provided student health services in fiscal year 1986-1987 and required them to maintain that level of student health services in fiscal year 1987-1988 and each fiscal year thereafter.

3. Parameters and Guidelines

On August 27, 1987, the original parameters and guidelines were adopted. On May 25, 1989, those parameters and guidelines were amended. A copy of the parameters and guidelines, as amended on May 25, 1989, is attached as Exhibit "B." So far as is relevant to the issues presented below, the parameters and guidelines state:

"V. REIMBURSABLE COSTS

A. Scope of Mandate

Incor	rect	Redu	ection	Claim	of Santa	Monica	Community	College	District
1/84;	111	8/87	Health	Fee	Eliminatio	on	•	•	

1 Eligible community college districts shall be reimbursed for 2 the costs of providing a health services program. Only 3 services provided in 1986-87 fiscal year may be claimed. ... VI. 4 **CLAIM PREPARATION** 5 B... 3. Allowable Overhead Cost 6 Indirect costs may be claimed in the manner 7 described by the State Controller in his claiming 8 instructions. 9 VII. SUPPORTING DATA 10 For auditing purposes, all costs claimed must be traceable to 11 source documents and/or worksheets that show evidence of the 12 validity of such costs.... 13 VIII OFFSETTING SAVINGS AND OTHER REIMBURSEMENTS 14 Any offsetting savings the claimant experiences as a direct result 15 of this statute must be deducted from the costs claimed. In 16 addition, reimbursement for this mandate received from any 17 source, e.g., federal, state, etc., shall be identified and deducted 18 from this claim. This shall include the amount of \$7.50 per full-time 19 student per semester, \$5.00 per full-time student for summer 20 school, or \$5.00 per full-time student per quarter, as authorized by 21 Education Code section 72246(a). This shall also include 22 payments (fees) received from individuals other than students who 23 are not covered by Education Code Section 72246 for health services. ..." 24 25 4. Claiming Instructions 26 The Controller has frequently revised claiming instructions for the Health Fee 27 Elimination mandate. A copy of the September 1997 revision of the claiming 28 instructions is attached as Exhibit "C." The September 1997 claiming instructions are 29 believed to be, for the purposes and scope of this incorrect reduction claim.

Incorrect Reduction Claim of Santa Monica Community College Di	istrict
1/84; 1118/87 Health Fee Elimination	

substantially similar to the version extant at the time the claims which are the subject of this incorrect reduction claim were filed. However, since the Controller's claim forms and instructions have not been adopted as regulations, they have no force of law, and, therefore, have no effect on the outcome of this incorrect reduction claim.

PART V. STATE CONTROLLER CLAIM ADJUDICATION

The Controller conducted an audit of the District's annual reimbursement claims for Fiscal Years 2001-02, and 2002-03. The audit concluded that 100% of the District's costs, as claimed, are unallowable. A copy of the March 17, 2006 (as revised on April 19, 2006) audit report and is attached as Exhibit "D."

VI. CLAIMANT'S RESPONSE TO THE STATE CONTROLLER

By letter dated December 19, 2005, the Controller transmitted a copy of its draft audit report. By letter dated January 4, 2006, the District objected to the proposed adjustments set forth in the draft audit report. A copy of the District's letter of January 4, 2006 is attached as Exhibit "E." The Controller then issued its final audit report without change to the adjustments as stated in the draft audit report.

PART VII. STATEMENT OF THE ISSUES

.Finding 1: Overstated indirect cost rates

The Controller asserts that the District overstated its indirect cost rates and costs in the amount of \$146,966 for the two fiscal years. This finding is based upon the Controller's statement that "the district did not obtain federal approval for its IRCPs.

We calculated indirect cost rates using the methodology described in the SCO claiming

Incorrect Reduction Claim of Santa Monica Community College District 1/84: 1118/87 Health Fee Elimination

1 instructions." Contrary to the Controller's ministerial preferences, there is no

requirement in law that the claimant's indirect cost rate must be "federally" approved,

and the Commission has never specified the federal agencies which have the authority

to approve indirect cost rates.

CCFS-311

In fact, both the District's method and the Controller's method utilized the same source document, the CCFS-311 annual financial and budget report required by the state. The difference in the claimed and audited methods is in the determination of which of those cost elements are direct costs and which are indirect costs. Indeed, the federally "approved" rates which the Controller will accept without further action, are "negotiated" rates calculated by a district and then submitted for approval to federal agencies which are the source of federal programs to which the indirect cost rate is to be applied, indicating that the process is not an exact science, but a determination of the relevance and reasonableness of the cost allocation assumptions made for the method used.

Regulatory Requirements

No particular indirect cost rate calculation is required by statute. The parameters and guidelines state that "Indirect costs *may be claimed* in the manner described by the Controller in his claiming instructions." The District claimed these indirect costs "in the manner" described by the Controller. The correct forms were used and the claimed amounts were entered at the correct locations.

In the audit report, the Controller asserts that "the specific directions for the indirect cost rate calculation in the claiming instructions are an extension of *Parameters and Guidelines*." It is not clear what the legal significance of the concept of "extension" might be, regardless, the reference to the claiming instructions in the parameters and guidelines does not change "may" into a "shall." Since the Controller's claiming instructions were never adopted as law, or regulations pursuant to the Administrative Procedure Act, the claiming instructions are merely a statement of the ministerial interests of the Controller and not law.

Unreasonable or Excessive

Government Code Section 17561(d)(2) requires the Controller to pay claims, provided that the Controller may audit the records of any school district to verify the actual amount of the mandated costs, and may reduce any claim that the Controller determines is excessive or unreasonable. The Controller is authorized to reduce a claim only if the Controller determines the claim to be excessive or unreasonable. Here, the District has computed its indirect cost rate utilizing cost accounting principles from the Office of Management and Budget Circular A-21, and the Controller has disallowed it without a determination of whether the product of the District's calculation would, or would not, be excessive, unreasonable, or inconsistent with cost accounting principles.

Neither state law nor the parameters and guidelines made compliance with the Controller's claiming instructions a condition of reimbursement. The District has

Incorrect Reduction Claim of Santa Monica Community College District 1/84; 1118/87 Health Fee Elimination

followed the parameters and guidelines. The burden of proof is on the Controller to prove that the District's calculation is unreasonable, not to recalculate the rate according to its unenforceable ministerial preferences. Therefore, the Controller made no determination as to whether the method used by the District was unreasonable, but, merely substituted its FAM-29C method for the method reported by the District. The substitution of the FAM-29C method is an arbitrary choice of the Controller, not a "finding" enforceable either by fact or law. The Controller's adjustment of the District's indirect cost rate should be withdrawn, since no legal or factual basis has been shown to disallow the indirect cost rate calculation used by the District.

Finding 2: Understated authorized health revenues claimed

The Controller asserts that the "authorized health fee revenues" were understated by \$538,244 for the two fiscal years. The District reported the actual student health fees collected as a reduction of health service costs. The adjustments for the student health services revenue are based on two reasons. First, the Controller adjusted the reported number of students subject to payment of the health services fee. Then, the Controller calculated the student fees collectible based on the highest student health service fee chargeable, rather than the fee actually charged the student, resulting in a total adjustment of \$538,244 for the two fiscal years.

Education Code Section 76355

Education Code Section 76355, subdivision (a), in relevant part, provides: "The governing board of a district maintaining a community college *may require* community

Incorrect Reduction Claim of Santa Monica Community College District 1/84; 1118/87 Health Fee Elimination

college students to pay a fee . . . for health supervision and services . . . " There is no 2 requirement that community colleges levy these fees. The permissive nature of the 3 provision is further illustrated in subdivision (b) which states "If, pursuant to this 4 Section, a fee is required, the governing board of the district shall decide the amount of 5 the fee, if any, that a part-time student is required to pay. The governing board may 6 decide whether the fee shall be mandatory or optional."

Parameters and Guidelines

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This Controller states that the "Parameters and Guidelines states that health fees authorized by the Education Code must be deducted from costs claimed." The parameters and guidelines actually state:

"Any offsetting savings that the claimant experiences as a direct result of this statute must be deducted from the costs claimed. In addition, reimbursement for this mandate received from any source, e.g., federal, state, etc., shall be identified and deducted from this claim. This shall include the amount of [student fees] as authorized by Education Code Section 72246(a)²."

In order for a district to "experience" these "offsetting savings" a district must actually have collected these fees. Student health services fees actually collected must be used to offset costs, but not student fees that could have been collected and were not. The use of the term "any offsetting savings" further illustrates the permissive nature of the fees.

² Former Education Code Section 72246 was repealed by Chapter 8. Statutes of 1993, Section 29, and was replaced by Education Code Section 76355.

Government Code Section 17514

The Controller relies upon Government Code Section 17514 for the conclusion that "[t]o the extent community college districts can charge a fee, they are not required to incur a cost." Government Code Section 17514, as added by Chapter 1459, Statutes of 1984, actually states:

"Costs mandated by the state" means any increased costs which a local agency or school district is required to incur after July 1, 1980, as a result of any statute enacted on or after January 1, 1975, or any executive order implementing any statute enacted on or after January 1, 1975, which mandates a new program or higher level of service of an existing program within the meaning of Section 6 of Article XIII B of the California Constitution."

There is nothing in the language of the statute regarding the authority to charge a fee, any nexus of fee revenue to increased cost, nor any language which describes the legal effect of fees collected.

The audit report states that the Controller agrees that community college districts "may choose not to levy a health service fee" and that Education Code Section 76355 "provides the districts with the authority to levy of such fees." However, it does not logically follow from that statement to the Controller's conclusion, based on Government Code Section 17514, that "health service costs recoverable through authorized fees are not costs that the district is required to incur."

Government Code Section 17556

The Controller relies upon Government Code Section 17556 for the conclusion that the "COSM shall not find costs mandated by the State if the district has the

- authority to levy fees to pay for the mandated program or increased level of services."
- 2 Government Code Section 17556 as last amended by Chapter 589/89 actually states:

"The commission shall not find costs mandated by the state, as defined in Section 17514, in any claim submitted by a local agency or school district, if after a hearing, the commission finds that: ...

(d) The local agency or school district has the authority to levy service charges, fees, or assessments sufficient to pay for the mandated program or increased level of service. ..."

The Controller misrepresents the law. Government Code Section 17556 prohibits the Commission on State Mandates from finding costs subject to reimbursement, that is, approving a test claim activity for reimbursement, where there is authority to levy fees in an amount sufficient to offset the entire mandated costs. Here, the Commission has already approved the test claim and made a finding of a new program or higher level of service for which the claimants do not have the ability to levy a fee in an amount sufficient to offset the entire mandated costs.

Student Health Services Fee Amount

The Controller asserts that the district should have collected a student health service fee each semester from non-exempt students in the amount of \$12 and \$9 for FY 2001-02 and FY 2002-03. Districts receive notice of these fee amounts from the Chancellor of the California Community Colleges. An example of one such notice is the letter dated March 5, 2001, attached as Exhibit "F." While Education Code Section 76355 provides for an increase in the student health service fee, it did not grant the Chancellor the authority to establish mandatory fee amounts or mandatory fee

Incorrect Reduction Claim of Santa Monica Community College District 1/84; 1118/87 Health Fee Elimination

increases. No state agency was granted that authority by the Education Code, and no state agency has exercised its rulemaking authority to establish mandatory fees amounts. It should be noted that the Chancellor's letter properly states that increasing the amount of the fee is at the option of the district, and that the Chancellor is not asserting that authority. Therefore, the state cannot rely upon the Chancellor's notice as a basis to adjust the claim for "collectible" student health services fees.

Fees Collected vs. Fees Collectible

This issue is one of student health fees revenue actually received, rather than student health fees which might be collected. The Commission determined, as stated in the parameters and guidelines, that the student health services fees "experienced" would reduce the amount subject to reimbursement. Student fees not collected are student fees not "experienced" and as such should not reduce reimbursement. Further, the amount "collectible" will never equal actual revenues collected due to changes in student BOGG eligibility, bad debt accounts, and refunds.

Because districts are not required to collect a fee from students for student health services, and if such a fee is collected, the amount is to be determined by the District and not the Controller, the Controller's adjustment is without legal basis. What claimants are required by the parameters and guidelines to do is to reduce the amount of their claimed costs by the amount of student health services fee revenue actually received. Therefore, student health fees are merely collectible, they are not mandatory, and it is inappropriate to reduce claim amounts by revenues not received.

- The audit finding should be rejected and the annual student health services actually
- 2 received used in lieu of a calculated amount potentially collectible either as reported by
- 3 the District or the Controller.

Enrollment and Exempted Student Statistics

The audit report states that the Controller adjusted the reported total student enrollment based the "enrollment census' data run" and the reported number of exempt students based on "the list of 'BOGG used' data run." The Controller has not provided any factual basis why these different and later data sources, subject to review and revision after the fact for several years, are preferable to the data reported by the District which was available at the time the claims were prepared. That is to say, the Controller does not indicate how and why its determination of the student counts is any more accurate than the amount reported on the claims.

PART VIII. RELIEF REQUESTED

The District filed its annual reimbursement claims within the time limits prescribed by the Government Code. The amounts claimed by the District for reimbursement of the costs of implementing the program imposed by Chapter 1, Statutes of 1984, 2nd E.S., Chapter 1118, Statutes of 1987, and Education Code Section 76355 represent the actual costs incurred by the District to carry out this program. These costs were properly claimed pursuant to the Commission's parameters and guidelines. Reimbursement of these costs is required under Article XIIIB, Section 6 of the California Constitution. The Controller denied reimbursement without any

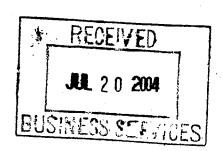
Incorrect Reduction Claim of Santa Monica Community College District 1/84; 1118/87 Health Fee Elimination

basis in law or fact. The District has met its burden of going forward on this claim by complying with the requirements of Section 1185, Title 2, California Code of Regulations. Because the Controller has enforced and is seeking to enforce these adjustments without benefit of statute or regulation, the burden of proof is now upon the Controller to establish a legal basis for its actions. The District requests that the Commission make findings of fact and law on each and every adjustment made by the Controller and each and every procedural and jurisdictional issue raised in this claim, and order the Controller to correct its audit report findings therefrom.

1 PART IX. CERTIFICATION 2 By my signature below, I hereby declare, under penalty of perjury under the laws 3 of the State of California, that the information in this incorrect reduction claim 4 submission is true and complete to the best of my own knowledge or information or 5 belief, and that the attached documents are true and correct copies of documents 6 received from or sent by the state agency which originated the document. 7 Executed on June 12, 2006, at Santa Monica, California, by 8 Thomas J. Donner, Executive Vice President 9 Business and Administration 10 11 Santa Monica Community College District 12 1900 Pico Blvd. 13 Santa Monica, CA 90405 14 Voice: 310-434-4200 15 Fax: 310-434-4386 16 E-Mail: DONNER THOMAS@smc.edu 17 APPOINTMENT OF REPRESENTATIVE 18 Santa Monica Community College District appoints Keith B. Petersen, SixTen 19 and Associates, as its representative for this incorrect reduction claim. 12/06 20 Monno 21 Thomas J. Dønner, Executive Vice President 22 Business and Administration 23 Santa Monica Community College District 24 Attachments: 25 Exhibit "A" Controller's Legal Counsel's Letter of July 15, 2004 26 Exhibit "B" Commission Parameters and Guidelines amended May 25, 1989 27 Exhibit "C" Controller's Claiming Instructions September 1997 28 Exhibit "D" Controller's Audit Report dated March 17 (April 19), 2006 29 Exhibit "E" District's Letter dated January 4, 2006 30 Exhibit "F" Chancellor's Letter dated March 5, 2001



STEVE WESTLY California State Controller



July 15, 2004

Mike Brandy, Vice Chancellor Foothill-De Anza Community College District 12345 El Monte Road Los Altos, CA 94022

Re: Foothill-De Anza Community College District Audit

Dear Mr. Brandy:

This is in response to your letter to me dated May 13, 2004, concerning the Controller's Audit of the Health Fee claim.

The Controller's informal audit review process was established to resolve factual disputes where no other forum for resolution, other than a judicial proceeding, is available.

The proper forum for resolving issues involving mandated cost programs is through the incorrect reduction process through the Commission on State Mandates. As such, this office will not be scheduling an informal conference for this matter.

However, in light of the concerns expressed in your letter concerning the auditors assigned and the validity of the findings, I am forwarding your letter to Vince Brown, Chief Operating Officer, for his review and response.

If you have any questions you may contact Mr. Vince Brown at (916) 445-2038.

Very truly yours,

RICHARD . CHIVARO

Chief Counsel

RJC/st

cc: Vincent P. Brown, Chief Operating Officer, State Controller's Office Jeff Brownfield, Chief, Division of Audits, State Controller's Office

Adopted: 8/27/87 Amended: 5/25/89

> PARAMETERS AND GUIDELINES Chapter 1, Statutes of 1984, 2nd E.S. Chapter 1118, Statutes of 1987 Health Fee Elimination

I. SUMMARY OF MANDATE

Chapter 1, Statutes of 1984, 2nd E.S. repealed Education Code Section 72246 which had authorized community college districts to charge a health fee for the purpose of providing health supervision and services, direct and indirect medical and hospitalization services, and operation of student health centers. This statute also required that health services for which a community college district charged a fee during the 1983-84 fiscal year had to be maintained at that level in the 1984-85 fiscal year and every year thereafter. The provisions of this statute would automatically repeal on December 31, 1987, which would reinstate the community colleges districts' authority to charge a health fee as specified.

Chapter 1118, Statutes of 1987, amended Education Code section 72246 to require any community college district that provided health services in 1986-87 to maintain health services at the level provided during the 1986-87 fiscal year in 1987-88 and each fiscal year thereafter.

II. COMMISSION ON STATE MANDATES' DECISION

At its hearing on November 20, 1986, the Commission on State Mandates determined that Chapter 1, Statutes of 1984, 2nd E.S. imposed a "new program" upon community college districts by requiring any community college district which provided health services for which it was authorized to charge a fee pursuant to former Section 72246 in the 1983-84 fiscal year to maintain health services at the level provided during the 1983-84 fiscal year in the 1984-85 fiscal year and each fiscal year thereafter. This maintenance of effort requirement applies to all community college districts which levied a health services fee in the 1983-84 fiscal year, regardless of the extent to which the health services fees collected offset the actual costs of providing health services at the 1983-84 fiscal year level.

At its hearing of April 27, 1989, the Commission determined that Chapter 1118, Statutes of 1987, amended this maintenance of effort requirement to apply to all community college districts which provided health services in fiscal year 1986-87 and required them to maintain that level in fiscal year 1987-88 and each fiscal year thereafter.

III. ELIGIBLE CLAIMANTS

Community college districts which provided health services in 1986-87 fiscal year and continue to provide the same services as a result of this mandate are eligible to claim reimbursement of those costs.

IV. PERIOD OF REIMBURSEMENT

Chapter 1, Statutes of 1984, 2nd E.S., became effective July 1, 1984. Section 17557 of the Government Code states that a test claim must be submitted on or before November 30th following a given fiscal year to establish for that fiscal year. The test claim for this mandate was filed on November 27, 1985; therefore, costs incurred on or after July 1, 1984, are reimbursable. Chapter 1118, Statutes of 1987, became effective January 1, 1988. Title 2, California Code of Regulations, section 1185.3(a) states that a parameters and guidelines amendment filed before the deadline for initial claims as specified in the Claiming Instructions shall apply to all years eligible for reimbursement as defined in the original parameters and guidelines; therefore, costs incurred on or after January 1, 1988, for Chapter 1118, Statutes of 1987, are reimbursable.

Actual costs for one fiscal year should be included in each claim. Estimated costs for the subsequent year may be included on the same claim if applicable. Pursuant to Section 17561(d)(3) of the Government Code, all claims for reimbursement of costs shall be submitted within 120 days of notification by the State Controller of the enactment of the claims bill.

If the total costs for a given fiscal year do not exceed \$200, no reimbursement shall be allowed, except as otherwise allowed by Government Code Section 17564.

V. REIMBURSABLE COSTS

A. Scope of Mandate

Eligible community college districts shall be reimbursed for the costs of providing a health services program. Only services provided in 1986-87 fiscal year may be claimed.

B. Reimbursable Activities

For each eligible claimant, the following cost items are reimbursable to the extent they were provided by the community college district in fiscal year 1986-87:

ACCIDENT REPORTS

APPOINTMENTS

College Physician - Surgeon
Dermatology, Family Practice, Internal Medicine
Outside Physician
Dental Services
Outside Labs (X-ray, etc.)
Psychologist, full services
Cancel/Change Appointments
R.N.
Check Appointments

```
ASSESSMENT, INTERVENTION & COUNSELING
    Birth Control
    Lab Reports
    Nutri tion
    Test Results (office)
    Other Medical Problems
    CD
    URI
    ENT
    Eye/Vision
    Derm./Allergy
    Gyn/Pregnancy Services
    Neuro
    Ortho
    GU
    Denta1
    GI
    Stress Counseling
    Crisis Intervention
    Child Abuse Reporting and Counseling
    Substance Abuse Identification and Counseling
    Aids
    Eating Disorders
   Weight Control
    Personal Hygiene
   Burnout
EXAMINATIONS (Minor Illnesses)
   Recheck Minor Injury
HEALTH TALKS OR FAIRS - INFORMATION
   Sexually Transmitted Disease
   Drugs
   Aids
   Child Abuse
   Birth Control/Family Planning
   Stop Smoking
   Etc.
   Library - videos and cassettes
FIRST AID (Major Emergencies)
FIRST AID (Minor Emergencies)
FIRST AID KITS (Filled)
IMMUNIZATIONS
   Diptheria/Tetanus
   Measles/Rubella
   Influenza
   Information
```

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INSURANCE
    On Campus Accident
    Voluntary
    Insurance Inquiry/Claim Administration
 LABORATORY TESTS DONE
    Inquiry/Interpretation
    Pap Smears
 PHYSICALS
    Employees
    Students
    Athletes
 MEDICATIONS (dispensed OTC for misc. illnesses)
    Antacids
    Antidiarrhial
   Antihistamines
    Aspirin, Tylenol, etc.
    Skin rash preparations
   Misc.
   Eye drops
   Ear drops
   Toothache - Oil cloves
   Stingkill
   Midol - Menstrual Cramps
PARKING CARDS/ELEVATOR KEYS
   Tokens
   Return card/key
   Parking inquiry
   Elevator passes
   Temporary handicapped parking permits
REFERRALS TO OUTSIDE AGENCIES
   Private Medical Doctor
   Health Department
   Clinic
   Dental
   Counseling Centers
   Crisis Centers
   Transitional Living Facilities (Battered/Homeless Women)
   Family Planning Facilities
   Other Health Agencies
TESTS
   Blood Pressure
   Hearing
   Tuberculosis
      Reading
      Information
  Vision
  G1 ucometer
```

Urinalysis

Hemoglobin E.K.G.
Strep A testing P.G. testing Monospot Hemacult Misc.

MISCELLANEOUS

Absence Excuses/PE Waiver Allergy Injections Bandaids Booklets/Pamphlets Dressing Change Rest Suture Removal Temperature Weigh Misc. Information Report/Form Wart Removal

COMMITTEES
Safety
Environmental
Disaster Planning

SAFETY DATA SHEETS Central file

X-RAY SERVICES

COMMUNICABLE DISEASE CONTROL

BODY FAT MEASUREMENTS

MINOR SURGERIES

SELF-ESTEEM GROUPS

MENTAL HEALTH CRISIS

AA GROUP

ADULT CHILDREN OF ALCOHOLICS GROUP

WORKSHOPS

Test Anxiety
Stress Management
Communication Skills
Weight Loss
Assertiveness Skills

VI. CLAIM PREPARATION

Each claim for reimbursement pursuant to this mandate must be timely filed and set forth a list of each item for which reimbursement is claimed under this mandate.

A. Description of Activity

- 1. Show the total number of full-time students enrolled per semester/quarter.
- Show the total number of full-time students enrolled in the summer program.
- 3. Show the total number of part-time students enrolled per semester/quarter.
- 4. Show the total number of part-time students enrolled in the summer program.
- B. Actual Costs of Claim Year for Providing 1986-87 Fiscal Year Program Level of Service

Claimed costs should be supported by the following information:

1. Employee Salaries and Benefits

Identify the employee(s), show the classification of the employee(s) involved, describe the mandated functions performed and specify the actual number of hours devoted to each function, the productive hourly rate, and the related benefits. The average number of hours devoted to each function may be claimed if supported by a documented time study.

2. Services and Supplies

Only expenditures which can be identified as a direct cost of the mandate can be claimed. List cost of materials which have been consumed or expended specifically for the purpose of this mandate.

3. Allowable Overhead Cost

Indirect costs may be claimed in the manner described by the State Controller in his claiming instructions.

VII. SUPPORTING DATA

For auditing purposes, all costs claimed must be traceable to source documents and/or worksheets that show evidence of the validity of such costs. This would include documentation for the fiscal year 1986-87 program to substantiate a maintenance of effort. These documents must be kept on file by the agency submitting the claim for a period of no

less than three years from the date of the final payment of the claim pursuant to this mandate, and made available on the request of the State Controller or his agent.

VIII. OFFSETTING SAVINGS AND OTHER REIMBURSEMENTS

Any offsetting savings the claimant experiences as a direct result of this statute must be deducted from the costs claimed. In addition, reimbursement for this mandate received from any source, e.g., federal, state, etc., shall be identified and deducted from this claim. This shall include the amount of \$7.50 per full-time student per semester, \$5.00 per full-time student for summer school, or \$5.00 per full-time student per quarter, as authorized by Education Code section 72246(a). This shall also include payments (fees) received from individuals other than students who are not covered by Education Code Section 72246 for health services.

IX. REQUIRED CERTIFICATION

The following certification must accompany the claim:

I DO HEREBY CERTIFY under penalty of perjury:

THAT the foregoing is true and correct:

THAT Section 1090 to 1096, inclusive, of the Government Code and other applicable provisions of the law have been complied with;

and

THAT I am the person authorized by the local agency to file claims for funds with the State of California.

Signature of Authorized Representative	Date
Title	Telephone No.

0350d

HEALTH FEE ELIMINATION

1. Summary of Chapters 1/84, 2nd E.S., and Chapter 1118/87

Chapter 1, Statutes of 1984, 2nd E.S., repealed Education Code § 72246 which authorized community college districts to charge a fee for the purpose of providing health supervision and services, direct and indirect medical and hospitalization services, and operation of student health centers. The statute also required community college districts that charged a fee in the 1983/84 fiscal year to maintain that level of health services in the 1984/85 fiscal year and each fiscal year thereafter. The provisions of this statute would automatically repeal on December 31, 1987, which would reinstate the community college districts' authority to charge a health fee as specified.

Chapter 1118, Statutes of 1987 amended Education Code § 72246 to require any community college district that provided health services in the 1986/87 fiscal year to maintain health services at that level in the 1986/87 fiscal year and each fiscal year thereafter. Chapter 8, Statutes of 1993, has revised the numbering of § 72246 to § 76355.

2. Eligible Claimants

Any community college district incurring increased costs as a result of this mandate is eligible to claim reimbursement of these costs.

3. Appropriations

To determine if current funding is available for this program, refer to the schedule "Appropriations for State Mandated Cost Programs" in the "Annual Claiming Instructions for State Mandated Costs" issued in mid-September of each year to community college presidents.

4. Types of Claims

A. Reimbursement and Estimated Claims

A claimant may file a reimbursement claim and/or an estimated claim. A reimbursement claim details the costs actually incurred for a prior fiscal year. An estimated claim shows the costs to be incurred for the current fiscal year.

B. Minimum Claim

Section 17564(a), Government Code, provides that no claim shall be filed pursuant to Section 17561 unless such a claim exceeds \$200 per program per fiscal year.

5. Filing Deadline

(1) Refer to item 3 "Appropriations" to determine if the program is funded for the current fiscal year. If funding is available, an estimated claim must be filed with the State Controller's Office and postmarked by November 30, of the fiscal year in which costs are to be incurred. Timely filed estimated claims will be paid before late claims.

After having received payment for an estimated claim, the claimant must file a reimbursement claim by November 30, of the following fiscal year regardless whether the payment was more or less than the actual costs. If the local agency fails to file a reimbursement claim, monies received must be returned to the State. If no estimated claim was filed, the local agency may file a reimbursement

claim detailing the actual costs incurred for the fiscal year, provided there was an appropriation for the program for that fiscal year. (See item 3 above).

(2) A reimbursement claim detailing the actual costs must be filed with the State Controller's Office and postmarked by November 30 following the fiscal year in which costs were incurred. If the claim is filed after the deadline but by November 30 of the succeeding fiscal year, the approved claim must be reduced by a late penalty of 10%, not to exceed \$1,000. Claims filed more than one year after the deadline will not be accepted.

6. Reimbursable Components

Eligible claimants will be reimbursed for health service costs at the level of service provided in the 1986/87 fiscal year. The reimbursement will be reduced by the amount of student health fees authorized per the Education Code § 76355.

After January 1, 1993, pursuant to Chapter 8, Statutes of 1993, the fees students were required to pay for health supervision and services were not more than:

\$10.00 per semester

\$5.00 for summer school

\$5,00 for each quarter

Beginning with the summer of 1997, the fees are:

\$11.00 per semester

\$8,00 for summer school or

\$8,00 for each quarter

The district may increase fees by the same percentage increase as the Implicit Price Deflator (IPD) for the state and local government purchase of goods and services. Whenever the IPD calculates an increase of one dollar (\$1) above the existing amount, the fees may be increased by one dollar (\$1).

7. Reimbursement Limitations

- A. If the level at which health services were provided during the fiscal year of reimbursement is less than the level of health services that were provided in the 1986/87 fiscal year, no reimbursement is forthcoming.
- B. Any offsetting savings or reimbursement the claimant received from any source (e.g. federal, state grants, foundations, etc.) as a result of this mandate, shall be identified and deducted so only net local costs are claimed.

8. Claiming Forms and Instructions

The diagram "Illustration of Claim Forms" provides a graphical presentation of forms required to be filed with a claim. A claimant may submit a computer generated report in substitution for forms HFE-1.0, HFE-1.1, and form HFE-2 provided the format of the report and data fields contained within the report are identical to the claim forms included in these instructions. The claim forms provided with these instructions should be duplicated and used by the claimant to file estimated and reimbursement claims. The State Controller's Office will revise the manual and claim forms as necessary. In such instances, new replacement forms will be mailed to claimants.

A. Form HFE- 2, Health Services

This form is used to list the health services the community college provided during the 1986/87 fiscal year and the fiscal year of the reimbursement claim.

B. Form HFE-1.1, Claim Summary

This form is used to compute the allowable increased costs an individual college of the community college district has incurred to comply with the state mandate. The level of health services reported on this form must be supported by official financial records of the community college district. A copy of the document must be submitted with the claim. The amount shown on line (13) of this form is carried to form HFE-1.0.

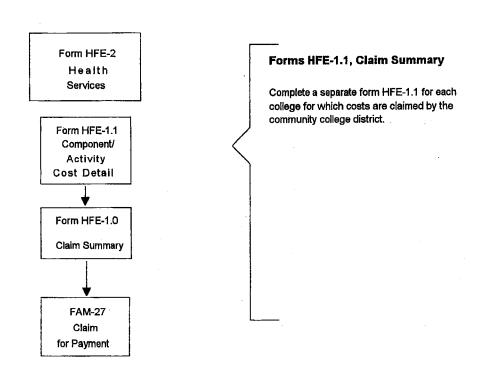
C. Form HFE-1.0, Claim Summary

This form is used to list the individual colleges that had increased costs due to the state mandate and to compute a total claimable cost for the district. The "Total Amount Claimed", line (04) on this form is carried forward to form FAM-27, line 13, for the reimbursement claim, or line (07) for the estimated claim.

D. Form FAM-27, Claim for Payment

This form contains a certification that must be signed by an authorized representative of the local agency. All applicable information from form HFE-1.0 and HFE 1.1 must be carried forward to this form for the State Controller's Office to process the claim for payment.

Illustration of Claim Forms



State Controller's Off	ice		2	ted Cost Manual
	CLAIM FOR PAYMEN	For State Controller Use Or	ly Program	
Pursuan	t to Government Code S	(19) Program Number 00029		
	HEALTH FEE ELIMINAT	(20) Date Filed//	- 029	
	TEALITIFEE CLIMINA!	ION	(21) LRS Input//	
(01) Claimant Identification Nur	mber		Reimbursement (Claim Data
(02) Claimant Name			(22) HFE-1.0,(04)(b)	
County of Location			(23)	
Street Address or P.O. Box		Suite	(24)	
City	State	Zip Code	(25)	
Type of Claim	Estimated Claim	Reimbursement Claim	(26)	
	(03) Estimated	(09) Reimbursement	(27)	
	(04) Combined	(10) Combined	(28)	
	(05) Amended	(11) Amended	(29)	
Fiscal Year of Cost	(06) 20/20	(12) 20/20	(30)	
Total Claimed Amount	(07)	(13)	(31)	
Less: 10% Late Penalty, not to exceed \$1,000		(14)	(32)	
Less: Prior Claim Paym	ent Received	(15)	(33)	
Net Claimed Amount		(16)	(34)	
Due to Claimant	(08)	(17)	(35)	
Due to State		(18)	(36)	
with the State of Californi penalty of perjury that I h I further certify that there costs claimed herein; and Chapter 1, Statutes of 198 The amounts for Estimate	ovisions of Government Code ia for costs mandated by Chap ave not violated any of the pro was no application other than d such costs are for a new pro 84, and Chapter 1118, Statutes ed Claim and/or Reimburseme rogram of Chapter 1, Statutes	• § 17561, I certify that I am the oter 1, Statutes of 1984, and Chapter 1, Statutes of 1984, and Chapter 1 from the claimant, nor any gragram or increased level of serve of 1987. Int Claim are hereby claimed from 1984, and Chapter 1118, States	apter 1118, Statutes of 1987, a Sections 1090 to 1096, inclusivent or payment received, for revices of an existing program ment the State for payment of es	nd certify under e. imbursement of andated by timated and/or actu
Type or Print Name			Title	
(38) Name of Contact Person	for Claim	Telephone Number	()	Ext.
		E-Mail Address		

State Controller's Office

Program **029**

HEALTH FEE ELIMINATION Certification Claim Form Instructions

FORM FAM-27

- (01) Leave blank.
- (02) A set of mailing labels with the claimant's I.D. number and address was enclosed with the letter regarding the claiming instructions. The mailing labels are designed to speed processing and prevent common errors that delay payment. Affix a label in the space shown on form FAM-27. Cross out any errors and print the correct information on the label. Add any missing address items, except county of location and a person's name. If you did not receive labels, print or type your agency's mailing address.
- (03) If filling an original estimated claim, enter an "X" in the box on line (03) Estimated.
- (04) If filing an original estimated claim on behalf of districts within the county, enter an "X" in the box on line (04) Combined.
- (05) If filing an amended or combined claim, enter an "X" in the box on line (05) Amended. Leave boxes (03) and (04) blank.
- (06) Enter the fiscal year in which costs are to be incurred.
- (07) Enter the amount of estimated claim. If the estimate exceeds the previous year's actual costs by more than 10%, complete form HFE-1.0 and enter the amount from line (04)(b).
- (08) Enter the same amount as shown on line (07).
- (09) If filling an original reimbursement claim, enter an "X" in the box on line (09) Reimbursement.
- (10) If filling an original reimbursement claim on behalf of districts within the county, enter an "X" in the box on line (10) Combined.
- (11) If filling an amended or a combined claim on behalf of districts within the county, enter an "X" in the box on line (11) Amended.
- (12) Enter the fiscal year for which actual costs are being claimed. If actual costs for more than one fiscal year are being claimed, complete a separate form FAM-27 for each fiscal year.
- (13) Enter the amount of reimbursement claim from form HFE-1.0, line (04)(b).
- (14) Reimbursement claims must be filed by January 15 of the following fiscal year in which costs are incurred or the claims shall be reduced by a late penalty. Enter either the product of multiplying line (13) by the factor 0.10 (10% penalty) or \$1,000, whichever is less.
- (15) If filing a reimbursement claim and a claim was previously filed for the same fiscal year, enter the amount received for the claim.

 Otherwise, enter a zero.
- (16) Enter the result of subtracting line (14) and line (15) from line (13).
- (17) If line (16) Net Claimed Amount is positive, enter that amount on line (17) Due from State.
- (18) If line (16) Net Claimed Amount is negative, enter that amount in line (18) Due to State.
- (19) to (21) Leave blank.
- (22) to (36) Reimbursement Claim Data. Bring forward the cost information as specified on the left-hand column of lines (22) through (36) for the reimbursement claim, e.g., HFE-1.0, (04)(b), means the information is located on form HFE-1.0, line (04), column (b). Enter the information on the same line but in the right-hand column. Cost information should be rounded to the nearest dollar, i.e., no cents. Indirect costs percentage should be shown as a whole number and without the percent symbol, i.e., 7.548% should be shown as 8. Completion of this data block will expedite the payment process.
- (37) Read the statement "Certification of Claim." If it is true, the claim must be dated, signed by the agency's authorized officer, and must include the person's name and title, typed or printed. Claims cannot be paid unless accompanied by a signed certification.
- (38) Enter the name, telephone number, and e-mail address of the person whom this office should contact if additional information is required.

SUBMIT A SIGNED, ORIGINAL FORM FAM-27 WITH ALL OTHER FORMS AND SUPPORTING DOCUMENTS (NO COPIES NECESSARY) TO:

Address, if delivered by U.S. Postal Service:

OFFICE OF THE STATE CONTROLLER ATTN: Local Reimbursements Section Division of Accounting and Reporting P.O. Box 942850 Sacramento, CA 94250 Address, if delivered by other delivery service:

OFFICE OF THE STATE CONTROLLER ATTN: Local Reimbursements Section Division of Accounting and Reporting 3301 C Street, Suite 500 Sacramento, CA 95816

School Mandated Cost Manual **State Controller's Office FORM MANDATED COSTS HEALTH FEE ELIMINATION** HFE-1.0 **CLAIM SUMMARY** Fiscal Year (02) Type of Claim (01) Claimant Reimbursement 19 _/19__ **Estimated** (03) List all the colleges of the community college district identified in form HFE-1.1, line (03) (b) Claimed Amount (a) Name of College 1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 15. 16. 17. 18. 19. 20. 21. [Line (3.1b) + line (3.2b) + line (3.3b) + ...line (3.21b)] (04) Total Amount Claimed

HEALTH FEE ELIMINATION CLAIM SUMMARY Instructions

FORM HFE-1.0

- (01) Enter the name of the claimant. Only a community college district may file a claim with the State Controller's Office on behalf of its colleges.
- (02) Check a box, Reimbursement or Estimated, to identify the type of claim being filed. Enter the fiscal year for which the expenses were/are to be incurred. A separate claim must be filed for each fiscal year.

Form HFE-1.0 must be filed for a reimbursement claim. Do not complete form HFE-1.0 if you are filing an estimated claim and the estimate is not more than 110% of the previous fiscal year's actual costs. Simply enter the amount of the estimated claim on form FAM-27, line (07). However, if the estimated claim exceeds the previous fiscal year's actual costs by more than 10%, forms HFE-1.0 and HFE-1.1 must be completed and a statement attached explaining the increased costs. Without this information the high estimated claim will automatically be reduced to 110% of the previous fiscal year's actual costs.

- (03) List all the colleges of the community college district which have increased costs. A separate form HFE-1.1 must be completed for each college showing how costs were derived.
- (04) Enter the total claimed amount of all colleges by adding the Claimed Amount, line (3.1b) + line (3.2b) ...+ (3.21b).

MANDATED COSTS HEALTH FEE ELIMINATION CLAIM SUMMARY							FORM HFE-1.1
(01) Claimant		(02) Type	of Claim				Fiscal Year
		Reim Estim	bursement nated				19/19
(03) Name of College							
(04) Indicate with a check mark, the 1986/87 fiscal year. If the "Le	he level at which	h health servic	es were provider	d during the fisca	al year of reimbu	irsement in com	parison to the
LESS		SAME		MORE			_
					Direct Cost	Indirect Cost	Total
(05) Cost of health services for th	ne fiscal year of	claim			:		
(06) Cost of providing current fisc level provided in 1986/87	ai year health s	services which	are in excess of	the			
(07) Cost of providing current fisc [Line (05) - line (06)]	cal year health :	services at the	1986/87 level				
(08) Complete columns (a)) through (g) to provide	e detail data	for health fe	es		
Period for which health fees were collected	(a) Number of Full-time Students	(b) Number of Part-time Students	(c) Unit Cost for Full-time Student per Educ. Code § 76355	(d) Full-time Student Health Fees (a) x (c)	(e) Unit Cost for Part-time Student per Educ. Code § 76355	(f) Part-time Student Health Fees (b) x (e)	(g) Student Health Fees That Could Have Been Collected (d) + (f)
Per fall semester							
2. Per spring semester							
3. Per summer session							
4. Per first quarter	†						
5. Per second quarter							
6. Per third quarter							
(09) Total health fee that o	could have l	been collec	ted	[Line (8.1g	g) + (8.2g) +	(8.6g)]	
(10) Sub-total				[Line (07)	- line (09)]		
Cost Reduction							
(11) Less: Offsetting Savi	ings, if appl	icable	1,				
(12) Less: Other Reimbur	sements, if	applicable					
(13) Total Amount Claimed [Line (10) - {line (11) + line (12)}]							

HEALTH FEE ELIMINATION CLAIM SUMMARY Instructions

FORM HFE-1.1

- (01) Enter the name of the claimant. Only a community college district may file a claim with the State Controller's Office on behalf of its colleges.
- (02) Type of Claim. Check a box, Reimbursement or Estimated, to identify the type of claim being filed. Enter the fiscal year of costs.
 - Form HFE-1.1 must be filed for a reimbursement claim. If you are filing an estimated claim and the estimate does not exceed the previous year's actual costs by 10%, do not complete form HFE-1.1. Simply enter the amount of the estimated claim on form FAM-27, line (05), Estimated. However, if the estimated claim exceeds the previous fiscal year's actual costs by more than 10%, form HFE-1.1 must be completed and a statement attached explaining the increased costs. Without this information the high estimated claim will automatically be reduced to 110% of the previous fiscal year's actual costs.
- (03) Enter the name of the college or community college district that provided student health services in the 1986/87 fiscal year and continue to provide the same services during the fiscal year of the claim.
- (04) Compare the level of health services provided during the fiscal year of reimbursement to the 1986/87 fiscal year and indicate the result by marking a check in the appropriate box. If the "Less" box is checked, STOP and do not complete the remaining part of this claim form. No reimbursement is forthcoming.
- (05) Enter the direct cost, indirect cost, and total cost of health services for the fiscal year of claim on line (05). Direct cost of health services is identified on the college expenditures report (individual college's cost of health services as authorized under Education Code § 76355 and included in the district's Community College Annual Financial and Budget Report CCFS-311, EDP Code 6440, column 5). If the amount of direct costs claimed is different than shown on the expenditures report, provide a schedule listing those community college costs that are in addition to, or a reduction to expenditures shown on the report. For claiming indirect costs, college districts have the option of using a federally approved rate (i.e., utilizing the cost accounting principles from the Office of Management and Budget Circular A-21), or the State Controller's methodology outlined in "Filing a Claim" of the Mandated Cost Manual for Schools.
- (06) Enter the direct cost, indirect cost, and total cost of health services that are in excess of the level provided in the 1986/87 fiscal year.
- (07) Enter the difference of the cost of health services for the fiscal year of claim, line (05), and the cost of providing current fiscal year health services that is in excess of the level provided in the 1986/87 fiscal year, line (06).
- Complete columns (a) through (g) to provide details on the amount of health service fees that could have been collected. Do not include students who are exempt from paying health fees established by the Board of Governors and contained in Section 58620 of Title 5 of the California Code of Regulations. After 01/01/93, the student fees for health supervision and services were \$10.00 per semester, \$5.00 for summer school, and \$5.00 for each quarter. Beginning with the summer of 1997, the health service fees are: \$11.00 per semester and \$8.00 for summer school, or \$8.00 for each quarter.
- (09) Enter the sum of Student Health Fees That Could Have Been Collected, (other than from students who were exempt from paying health fees) [Line (8.1g) + line (8.2g) + line (8.3g) + line (8.4g) + line (8.5g) + line (8.6g)].
- (10) Enter the difference of the cost of providing health services at the 1986/87 level, line (07) and the total health fee that could have been collected, line (09). If line (09) is greater than line (07), no claim shall be filed.
- (11) Enter the total savings experienced by the school identified in line (03) as a direct cost of this mandate. Submit a schedule of detailed savings with the claim.
- (12) Enter the total other reimbursements received from any source, (i.e., federal, other state programs, etc.,). Submit a schedule of detailed reimbursements with the claim.
- (13) Subtract the sum of Offsetting Savings, line (11), and Other Reimbursements, line (12), from Total 1986/87 Health Service Cost excluding Student Health Fees.

MANDATED COSTS HEALTH ELIMINATION FEE HEALTH SERVICES

FORM HFE-2

HEALTH SERVIC	E5		
01) Claimant:	(02) Fiscal Year costs were incur	red:	
(03) Place an "X" in columns (a) and/or (b), as applicable, to were provided by student health service fees for the indicate	o indicate which health services ed fiscal years.	(a) FY 1986/87	(b) FY of Claim
Accident Reports			
Appointments			
College Physician, surgeon			
Dermatology, family practice		1	
Internal Medicine			
Outside Physician			
Dental Services		,	
Outside Labs, (X-ray, etc.) Psychologist, full services	•	1	
Cancel/Change Appointments			
Registered Nurse		1	İ
Check Appointments			
•			
Assessment, Intervention and Counseling			1
Birth Control			
Lab Reports Nutrition			
Test Results, office	•	ļ	1
Venereal Disease			
Communicable Disease			
Upper Respiratory Infection			1
Eyes, Nose and Throat			
Eye/Vision			j
Dermatology/Allergy		ľ	
Gynecology/Pregnancy Service		1	
Neuralgic			İ
Orthopedic			
Genito/Urinary Dental			1
Gastro-Intestinal		1	
Stress Counseling			1
Crisis Intervention	•		
Child Abuse Reporting and Counseling			
Substance Abuse Identification and Counseling			
Acquired Immune Deficiency Syndrome			
Eating Disorders			
Weight Control			
Personal Hygiene			
Burnout Other Medical Problems, list			
Other Medical Problems, list			
Examinations, minor illnesses			
Recheck Minor Injury			
Health Talks or Fairs, Information			
Sexually Transmitted Disease			
Drugs			
Acquired Immune Deficiency Syndrome			
]

MANDATED COSTS HEALTH ELIMINATION FEE HEALTH SERVICES

FORM HFE-2

HEALIN SERVICE			
(01) Claimant:	(02) Fiscal Year costs were incurre	ed:	
(03) Place an "X" in column (a) and/or (b), as applicable, to it provided by student health service fees for the indicated fisc	ndicate which health services were al years.	(a) FY 1986/87	(b) FY of Claim
Child Abuse Birth Control/Family Planning Stop Smoking Library, Videos and Cassettes			
First Aid, Major Emergencies			
First Aid, Minor Emergencies			
First Aid Kits, Filled			
Immunizations Diphtheria/Tetanus Measles/Rubella Influenza Information			
Insurance On Campus Accident Voluntary Insurance Inquiry/Claim Administration			
Laboratory Tests Done Inquiry/Interpretation Pap Smears		-	
Physical Examinations Employees Students Athletes			
Medications Antacids Antidiarrheal Aspirin, Tylenol, Etc Skin Rash Preparations Eye Drops Ear Drops Toothache, oil cloves Stingkill Midol, Menstrual Cramps Other, list			
Parking Cards/Elevator Keys Tokens Return Card/Key Parking Inquiry Elevator Passes Temporary Handicapped Parking Permits			

MANDATED COSTS HEALTH ELIMINATION FEE HEALTH SERVICES

FORM HFE-2

HEALTH SERVIC	ES		
(01) Claimant:	(02) Fiscal Year costs were incur	red:	
(03) Place an "X" in columns (a) and/or (b), as applicable, were provided by student health service fees for the indica	(a) FY 1986/87	(b) FY of Claim	
Referrals to Outside Agencies			
Private Medical Doctor		į.	
Health Department			
Clinic			
Dental Counseling Centers			
Crisis Centers			
Transitional Living Facilities, battered/homeless wo	men		ł
Family Planning Facilities		Ì	
Other Health Agencies			
Tests			
Blood Pressure			
Hearing			
Tuberculosis			
Reading			
Information			
Vision			1
Glucometer			
Urinalysis Hemoglobin			
EKG			
Strep A testing			
PG Testing			
Monospot			
Hemacult			
Others, list			
Miscellaneous			
Absence Excuses/PE Waiver			ĺ
Allergy Injections Bandaids			-
Booklets/Pamphlets			
Dressing Change			
Rest			
Suture Removal			
Temperature		İ	
Weigh			
Information Report/Form			
Wart Removal			
Others, list			1
Committees		1	
Committees Safety			}
Environmental			
Disaster Planning			
, and the second			



STEVE WESTLY California State Controller

April 19, 2006

Thomas J. Donner, Ed.D.
Interim Superintendent/President
Santa Monica Community College District
1900 Pico Boulevard
Santa Monica, CA 90405

Dear Dr. Donner:

Enclosed is a revised copy of the State Controller's Office audit of the costs claimed by the Santa Monica Community College District for the legislatively mandated Health Fee Elimination Program (Chapter 1, Statutes of 1984, 2nd Extraordinary Session, and Chapter 1118, Statutes of 1987) for the period of July 1, 2001, through June 30, 2003. Minor corrections have been made to pages 5 and 9, and the pages have been marked as "revised 04/19/06." Please discard your copies of the prior version.

If you have any questions, please call me at (916) 323-5849.

Sincerely,

JIM L SPANO, Chief Compliance Audits Bureau

Division of Audits

JLS/wq

RE: C06-MCC-001

Enclosure

cc: Chris Bonvenuto, Accounting Manager
Santa Monica Community College District
Cheryl Miller, SixTen and Associates
Marty Rubio, Specialist, Fiscal Accountability Section
California Community Colleges Chancellor's Office
Jeannie Oropeza, Program Budget Manager
Education Systems Unit, Department of Finance

MAILING ADDRESS P.O. Box 942850, Sacramento, CA 94250-5874 SACRAMENTO 300 Capitol Mall, Suite 518, Sacramento, CA 95814 (916) 324-8907 LOS ANGELES 600 Corporate Pointe, Suite 1000, Culver City, CA 90230 (310) 342-5656

REVISED

Schedule 1 (continued)

Cost Elements	Actual Costs Claimed	Allowable per Audit	Audit Adjustment	Reference 1
Summary: July 1, 2001, through June 30, 2003				
Health services costs: Salaries and benefits Services and supplies Indirect costs	\$ 927,010 78,819 332,097	\$ 927,010 78,819 185,131	\$ <u> </u>	Finding 1
Total health services costs Less cost of services in excess of FY 1986-87 services	1,337,926	1,190,960	(146,966)	
Subtotal Less authorized health fees	1,337,926 (973,519)	1,190,960 (1,511,763)	(146,966) (538,244)	Finding 2
Subtotal Adjustment to eliminate negative balance	364,407	(320,803)	(685,210) 320,803	
Total Less amount paid by the State	\$ 364,407	(31,295)	\$ (364,407)	
Allowable costs claimed in excess of (less than) amoun	at paid	\$ (31,295)		

 $^{^{1}\,}$ See the Findings and Recommendations section.

District's Response

The District reported actual student health service revenues as a reduction of student health service costs. The Controller instead calculated "authorized health fee revenues," that is, the student fees collectible based on the highest student health service fee chargeable, rather the fee actually charged the student, or the fees actually collected.

"Authorized" Fee Amount

The Controller alleges that claimants must compute the total student health fees collectible based on the highest "authorized" rate. The Controller does not provide the factual basis for the calculation of the "authorized" rate, nor provide any reference to the "authorizing" source, nor the legal right of any state entity to "authorize" student health services rates absent rulemaking or compliance with the Administrative Procedure Act by the "authorizing" state agency.

Education Code Section 76355

Education Code Section 76355, subdivision (a), states that "The governing board of a district maintaining a community college may require community college students to pay a fee . . . for health supervision and services . . "There is no requirement that community colleges levy these fees. The permissive nature of the provision is further illustrated in subdivision (b) which states "If, pursuant to this section, a fee is required, the governing board of the district shall decide the amount of the fee, if any, that a part-time student is required to pay. The governing board may decide whether the fee shall be mandatory or optional." (Emphasis supplied in both instances)

Parameters and Guidelines

The Controller asserts that the parameters and guidelines require that health fees authorized by the Education Code must be deducted from the costs claimed. This is a misstatement of the parameters and guidelines. The parameters and guidelines, as last amended on May 25, 1989, state that "Any offsetting savings... must be deducted from the costs claimed... This shall include the amount of (student fees) as authorized by Education Code Section 72246(a)." Therefore, while student fees actually collected are properly used to offset costs, student fees that could have been collected, but were not, are not an offset.

Government Code Section 17514

The Controller relies upon Government Code Section 17514 for the conclusion that "[t]o the extent community college districts can charge a fee, they are not required to incur a cost." Government Code Section 17514, as added by Chapter 1459, Statutes of 1984, actually states:

"Costs mandated by the state" means any increased costs which a local agency or school district is required to incur after July 1, 1980, as a result of any statute enacted on or after January 1, 1975, or any executive order implementing any statute enacted on or after January 1, 1975, which mandates a new program or higher level of service of an existing program within the meaning of Section 6 of Article XIII B of the California Constitution.

SANTA MONICA COMMUNITY COLLEGE DISTRICT

Audit Report

HEALTH FEE ELIMINATION PROGRAM

Chapter 1, Statutes of 1984, 2nd Extraordinary Session, and Chapter 1118, Statutes of 1987

July 1, 2001, through June 30, 2003



STEVE WESTLY
California State Controller

March 2006



STEVE WESTLY

California State Controller

March 17, 2006

Thomas J. Donner, Ed.D. Interim Superintendent/President Santa Monica Community College District 1900 Pico Boulevard Santa Monica, CA 90405

Dear Dr. Donner:

The State Controller's Office audited the costs claimed by the Santa Monica Community College District for the legislatively mandated Health Fee Elimination Program (Chapter 1, Statutes of 1984, 2nd Extraordinary Session, and Chapter 1118, Statutes of 1987) for the period of July 1, 2001, through June 30, 2003.

The district claimed \$364,407 for the mandated program. Our audit disclosed that the entire amount is unallowable, because the district claimed unallowable costs and understated revenue. The State paid the district \$31,295, which the district should return.

If you disagree with the audit findings, you may file an Incorrect Reduction Claim (IRC) with the Commission on State Mandates (COSM). The IRC must be filed within three years following the date that we notify you of a claim reduction. You may obtain IRC information at COSM's Web site, at www.csm.ca.gov (Guidebook link); you may obtain IRC forms by telephone, at (916) 323-3562, or by e-mail, at csminfo@csm.ca.gov.

If you have any questions, please contact Jim L. Spano, Chief, Compliance Audits Bureau, at (916) 323-5849.

Sincerely,

JEFFREY V. BROWNFIELD

Chief, Division of Audits

JVB/ams

cc: Chris Bonvenuto

Accounting Manager

Santa Monica Community College District

Cheryl Miller

SixTen and Associates

Marty Rubio, Specialist

Fiscal Accountability Section

California Community Colleges Chancellor's Office

Jeannie Oropeza, Program Budget Manager

Education Systems Unit

Department of Finance

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Audit Report

Summary

The State Controller's Office (SCO) audited the costs claimed by the Santa Monica Community College District for the legislatively mandated Health Fee Elimination Program (Chapter 1, Statutes of 1984, 2nd Extraordinary Session, and Chapter 1118, Statutes of 1987) for the period of July 1, 2001, through June 30, 2003. The last day of fieldwork was September 22, 2005.

The district claimed \$364,407 for the mandated program. Our audit disclosed that the entire amount is unallowable, because the district claimed unallowable costs and understated revenue. The State paid the district \$31,295. The district should return the total amount to the State.

Background

Chapter 1, Statutes of 1984, 2nd Extraordinary Session (E.S.), repealed *Education Code* Section 72246 which had authorized community college districts to charge a health fee to provide health supervision and services, and medical and hospitalization services, and to operate student health centers. This statute also required that health services for which a community college district charged a fee during fiscal year (FY) 1983-84 had to be maintained at that level in FY 1984-85 and every year thereafter. The provisions of this statute would automatically sunset on December 31, 1987, reinstating the community college districts' authority to charge a health service fee as specified.

Chapter 1118, Statutes of 1987, amended *Education Code* Section 72246 (subsequently renumbered as Section 76355 by Chapter 8, Statutes of 1993). The law requires any community college district that provided health services in FY 1986-87 to maintain health services at the level provided during that year in FY 1987-88 and each fiscal year thereafter.

On November 20, 1986, the Commission on State Mandates (COSM) determined that Chapter 1, Statutes of 1984, 2nd E.S., imposed a "new program" upon community college districts by requiring specified community college districts that provided health services in FY 1983-84 to maintain health services at the level provided during that year in FY 1984-85 and each fiscal year thereafter. This maintenance-of-effort requirement applied to all community college districts that levied a health service fee in FY 1983-84.

On April 27, 1989, the COSM determined that Chapter 1118, Statutes of 1987, amended this maintenance-of-effort requirement to apply to all community college districts that provided health services in FY 1986-87, requiring them to maintain that level in FY 1987-88 and each fiscal year thereafter.

Parameters and Guidelines establishes the state mandate and defines reimbursement criteria. The COSM adopted Parameters and Guidelines on August 27, 1987, and amended it on May 25, 1989. In compliance with Government Code Section 17558, the SCO issues claiming instructions for mandated programs, to assist school districts in claiming reimbursable costs.

Objective, Scope, and Methodology

We conducted the audit to determine whether costs claimed represent increased costs resulting from the Health Fee Elimination Program for the period of July 1, 2001, through June 30, 2003.

Our audit scope included, but was not limited to, determining whether costs claimed were supported by appropriate source documents, were not funded by another source, and were not unreasonable and/or excessive.

We conducted the audit according to Government Auditing Standards, issued by the Comptroller General of the United States, and under the authority of Government Code Sections 12410, 17558.5, and 17561. We did not audit the district's financial statements. We limited our audit scope to planning and performing audit procedures necessary to obtain reasonable assurance that costs claimed were allowable for reimbursement. Accordingly, we examined transactions, on a test basis, to determine whether the costs claimed were supported.

We limited our review of the district's internal controls to gaining an understanding of the transaction flow and claim preparation process as necessary to develop appropriate auditing procedures.

We asked the district's representative to submit a written representation letter regarding the district's accounting procedures, financial records, and mandated cost claiming procedures as recommended by Government Auditing Standards. However, the district declined our request.

Conclusion

Our audit disclosed instances of noncompliance with the requirements outlined above. These instances are described in the accompanying Summary of Program Costs (Schedule 1) and in the Findings and Recommendations section of this report.

For the audit period, the Santa Monica Community College District claimed \$364,407 for costs of the Health Fee Elimination Program. Our audit disclosed that the entire amount is unallowable.

For FY 2001-02, the State paid the district \$31,295. Our audit disclosed that all of the costs claimed are unallowable. The district should return the entire amount to the State.

For FY 2002-03, the district received no payment.

Views of Responsible **Official**

We issued a draft audit report on December 9, 2005. Thomas J. Donner. Ed.D., Interim Superintendent/President, responded by letter dated January 4, 2006 (Attachment), disagreeing with the audit results. This final audit report includes the district's response.

Restricted Use

This report is solely for the information and use of the Santa Monica Community College District, the Los Angeles County Office of Education, the California Department of Education, the California Community Colleges Chancellor's Office, the California Department of Finance, and the SCO; it is not intended to be and should not be used by anyone other than these specified parties. This restriction is not intended to limit distribution of this report, which is a matter of public record.

JEFFREY V. BROWNFIELD

Chief, Division of Audits

Schedule 1— Summary of Program Costs July 1, 2001, through June 30, 2003

	-					
Cost Elements	_	Actual Costs Claimed	Allowable per Audit		Audit Adjustment	Reference 1
July 1, 2001, through June 30, 2002						
Health services costs: Salaries and benefits Services and supplies Indirect costs	\$	443,354 67,963 166,485	\$ 443,354 67,963 95,872	\$		Finding 1
Total health services costs Less cost of services in excess of FY 1986-87 services		677,802 —	607,189		(70,613)	
Subtotal Less authorized health fees		677,802 (479,007)	607,189 (750,759)		(271,752)	Finding 2
Subtotal Adjustment to eliminate negative balance		198,795	(143,570) 143,570	_	(342,365) 143,570	. •
Total Less amount paid by the State	<u>\$</u>	198,795	(31,295)	<u>\$</u>	(198,795)	•
Allowable costs claimed in excess of (less than) amoun	ıt pa	aid	\$ (31,295)		•	
July 1, 2002, through June 30, 2003			-			
Health services costs: Salaries and benefits Services and supplies Indirect costs	\$	483,656 10,856 165,612	\$ 483,656 10,856 89,259	\$	(76,353)	Finding 1
Total health services costs Less cost of services in excess of FY 1986-87 services		660,124	583,771		(76,353) —	
Subtotal Less authorized health fees		660,124 (494,512)	583,771 (761,004)		(76,353) (266,492)	Finding 2
Subtotal Adjustment to eliminate negative balance		165,612	(177,233) 177,233		(342,845) 177,233	
Total Less amount paid by the State	\$	165,612		\$	(165,612)	

Schedule 1 (continued)

Cost Elements	_	Actual Costs Claimed	Allowable per Audit	Audit Adjustment	Reference 1
Summary: July 1, 2001, through June 30, 2003					
Health services costs: Salaries and benefits Services and supplies Indirect costs	\$	927,010 78,819 332,097	\$ 927,010 78,819 185,131	_	Finding 1
Total health services costs Less cost of services in excess of FY 1986-87 services		1,337,926	1,190,960	(146,966)	
Subtotal Less authorized health fees		1,337,926 (973,519)	1,190,960 (1,511,763)	(146,966) (538,244)	Finding 2
Subtotal Adjustment to eliminate negative balance	_	364,407	(320,803) 320,803	(685,210) 320,803	
Total Less amount paid by the State	<u>\$</u>	364,407	(31,295)	\$ (364,407)	
Allowable costs claimed in excess of (less than) amoun	t pa	aid	\$ (31,295)		

¹ See the Findings and Recommendations section.

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Findings and Recommendations

FINDING 1— Overstated indirect cost rates The district overstated its indirect cost rates, and thus overstated its indirect costs by \$146,966 for the audit period.

The district claimed indirect costs based on indirect cost rate proposals (ICRPs) prepared for each fiscal year by an outside consultant. However, the district did not obtain federal approval for its ICRPs. We calculated indirect cost rates using the methodology described in the SCO claiming instructions. Our calculated indirect cost rates did not support the indirect cost rates claimed. The audited and claimed indirect cost rates are summarized as follows.

	1750	i i Gai
	2001-02	2002-03
Allowable indirect cost rate	18.75%	18.05%
Less claimed indirect cost rate	(32.56)%	(33.49)%
Unsupported indirect cost rate	(13.81)%	(15.44)%

Based on these unsupported indirect cost rates, the audit adjustments are summarized below.

	Fisca		
	2001-02	2002-03	Total
Claimed direct costs Unsupported indirect cost rate	\$ 511,317 ×(13.81)%	\$ 494,512 × (15.44)%	
Audit adjustment	\$ (70,613)	\$ (76,353)	\$ (146,966)

Parameters and Guidelines states that indirect costs may be claimed in the manner described in the SCO claiming instructions. The SCO claiming instructions prescribes the SCO's methodology (FAM-29C), a federally approved rate prepared in accordance with Office of Management and Budget (OMB) Circular A-21, or a flat rate (the most conservative rate). Form FAM-29C uses total expenditures reported on the California Community College Annual Financial and Budget Report, Expenditures by Activity (CCFS-311).

Recommendation

We recommend that the district implement procedures to ensure that claimed indirect costs are based on indirect cost rates computed in accordance with the SCO claiming instructions, and that it monitors staff adherence to its procedures. The district should obtain federal approval for ICRPs prepared in accordance with OMB Circular A-21. Alternately, the district should use form FAM-29C to prepare ICRPs based on the methodology allowed in the SCO claiming instructions.

District's Response

The Controller asserts that the indirect cost method used by the District was inappropriate since it was not a cost study specifically approved by the federal government. The parameters and guidelines do not require that indirect costs be claimed in the manner described by the Controller. The parameters and guidelines for Health Fee Elimination (as last amended on May 25, 1989) state that "indirect costs may be claimed in the manner described by the Controller in his claiming instructions." The parameters and guidelines do not require that indirect costs be claimed in the manner described by the Controller in the draft audit report.

The Controller's claiming instructions state that for claiming indirect costs, college districts have the option of using a federally approved rate from the Office of Management and Budget Circular A-21, a rate calculated using form FAM-29C, or a 7% indirect cost rate. The Controller claiming instructions were never adopted as rules or regulations, and therefore have no force of law. The burden is on the Controller to show that the indirect cost rate used by the District is excessive or unreasonable, which is the only mandated cost audit standard in statute (Government Code Section 17651(d)(2). If the Controller wishes to enforce other audit standards for mandated cost reimbursement, the Controller should comply with the Administrative Procedure Act.

Since the Controller has stated no legal basis to disallow the indirect cost rate calculation method used by the District, and has not shown a factual basis to reject the rates as unreasonable or excessive, the adjustments should be withdrawn.

SCO's Comment

The fiscal effect of the finding and recommendation remains unchanged.

Parameters and Guidelines states that indirect costs may be claimed in the manner described in the SCO's claiming instructions. Therefore, the specific directions for the indirect cost rate calculation in the claiming instructions are an extension of Parameters and Guidelines. The SCO's claiming instructions state that community colleges have the option of using a federally approved rate, prepared in accordance with OMB Circular A-21, the SCO's alternate methodology, using Form FAM-29C, or a flat 7% rate. In this case, the district chose to use indirect cost rates not approved by a federal agency, which is not an option provided by the SCO's claiming instructions.

FINDING 2— Understated authorized health fee revenues claimed

The district understated authorized health fee revenue by \$538,244 for the audit period.

The district reduced claimed costs by actual rather than authorized health fee revenues. Therefore, we recalculated the authorized health fee revenues by multiplying student enrollment by term, net of allowable health fee exemption, by the authorized student health fee. We obtained student enrollment information from the "enrollment census" data run and student waiver information from the list of "BOGG used" data run.

A summary of our adjustment to authorized health fee revenues is as follows.

	Fall	Winter	Spring	Summer	Total
FY 2001-02					
Student enrollment	29,476	13,164	29,390	15,484	
Less allowable health fee exemptions	(6,374)	(4,288)	(6,137)	(2,749)	
Subtotal	23,102	8,876	23,253	12,735	
Authorized student health fee	×\$12.00	× \$ 9.00	×\$12.00	× \$ 9.00	•
Audited authorized health fee revenues	\$277,224	\$ 79,884	\$279,036	\$114,615	\$750,759
Claimed authorized health fee revenues					(479,007)
Audit adjustment, FY 2001-02					271,752
FY 2002-03					
Student enrollment	29,803	13,199	28,219	16,781	
Less allowable health fee exemptions	(6,343)	(3,255)	(6,076)	(2,973)	
Subtotal	23,460	9,944	22,143	13,808	
Authorized student health fee	×\$12.00	× \$ 9.00	×\$12.00	× \$ 9.00	
Audited authorized health fee revenues	\$281.520	\$ 89,496	\$265,716	\$124,272	761,004
Claimed authorized health fee revenues				· ·	(494,512)
Audit adjustment, FY 2002-03					266,492
Total					\$538,244
Total					Ψ330,477

Parameters and Guidelines states that health fees authorized by the Education Code must be deducted from costs claimed. Education Code Section 7635(c) states that health fees are authorized from all students except those students who: (1) depend exclusively on prayer for healing; (2) are attending a community college under an approved apprenticeship training program; or (3) demonstrate financial need.

Also, Government Code Section 17514 states that "costs mandated by the State" means any increased costs which a district is required to incur. To the extent community college districts can charge a fee, they are not required to incur a cost. In addition, Government Code Section 17556 states that the COSM shall not find costs mandated by the State if the district has the authority to levy fees to pay for the mandated program or increased level of services.

Recommendation

We recommend that the district implement procedures to ensure that allowable health services program costs are offset by the amount of health service fee revenue authorized by the Education Code, and that it monitors staff adherence to its procedures.

District's Response

The District reported actual student health service revenues as a reduction of student health service costs. The Controller instead calculated "authorized health fee revenues," that is, the student fees collectible based on the highest student health service fee chargeable, rather the fee actually charged the student, or the fees actually collected.

"Authorized" Fee Amount

The Controller alleges that claimants must compute the total student health fees collectible based on the highest "authorized" rate. The Controller does not provide the factual basis for the calculation of the "authorized" rate, nor provide any reference to the "authorizing" source, nor the legal right of any state entity to "authorize" student health services rates absent rulemaking or compliance with the Administrative Procedure Act by the "authorizing" state agency.

Education Code Section 76355

Education Code Section 76355, subdivision (a), states that "The governing board of a district maintaining a community college may require community college students to pay a fee . . . for health supervision and services . . ." There is no requirement that community colleges levy these fees. The permissive nature of the provision is further illustrated in subdivision (b) which states "If, pursuant to this section, a fee is required, the governing board of the district shall decide the amount of the fee, if any, that a part-time student is required to pay. The governing board may decide whether the fee shall be mandatory or optional." (Emphasis supplied in both instances)

Parameters and Guidelines

The Controller asserts that the parameters and guidelines require that health fees authorized by the Education Code must be deducted from the costs claimed. This is a misstatement of the parameters and guidelines. The parameters and guidelines, as last amended on May 25, 1989, state that "Any offsetting savings... must be deducted from the costs claimed... This shall include the amount of (student fees) as authorized by Education Code Section 72246(a)." Therefore, while student fees actually collected are properly used to offset costs, student fees that could have been collected, but were not, are not an offset.

Government Code Section 17514

The Controller relies upon Government Code Section 17514 for the conclusion that "[t]o the extent community college districts can charge a fee, they are not required to incur a cost." Government Code Section 17514, as added by Chapter 1459, Statutes of 1984, actually states:

"Costs mandated by the state" means any increased costs which a local agency or school district is required to incur after July 1, 1980, as a result of any statute enacted on or after January 1, 1975, or any executive order implementing any statute enacted on or after January 1, 1975, which mandates a new program or higher level of service of an existing program within the meaning of Section 6 of Article XIII B of the California Constitution.

There is nothing in the language of the statute regarding the authority to charge a fee, any nexus of fee revenue to increased cost, nor any language which describes the legal effect of fees collected.

Government Code Section 17556

The Controller relies upon Government Code Section 17556 for the conclusion that "the COSM shall not find costs mandated by the State if the school district has the authority to levy fees to pay for the mandated program or increased level of service." Government Code Section 17556 as last amended by Chapter 589/89 actually states:

"The commission shall not find costs mandated by the state, as defined in Section 17514, in any claim submitted by a local agency or school district, if after a hearing, the commission finds that: . . . (d) The local agency or school district has the authority to levy service charges, fees, or assessments sufficient to pay for the mandated program or increased level of service. . . . "

The Controller misrepresents the law. Government Code Section 17556 prohibits the Commission on State Mandates from finding costs subject to reimbursement, that is approving a test claim activity for reimbursement, where the authority to levy fees in an amount sufficient to offset the entire mandated costs. Here, the Commission has already approved the test claim and made a finding of a new program or higher level of service for which the claimants do not have the ability to levy a fee in an amount sufficient to offset the entire mandated costs.

SCO's Comment

The finding and recommendation remain unchanged.

We agree that community college districts may choose not to levy a health service fee. However, Education Code Section 76355 gives districts the authority to levy a health service fee. The authorized fees are specified in Education Code Section 76355(c), as identified in the finding. Government Code Section 17556 states that the Commission on State Mandates (COSM) shall not find costs mandated by the State as defined in Government Code Section 17514 if the district has authority to levy fees to pay for the mandated program or increased level of service. For this mandated program, the COSM concluded that districts have authority to levy a health service fee; thus, the adopted Parameters and Guidelines identifies authorized health service fees as offsetting reimbursements. Health services costs recoverable through an authorized fee are not costs the district is required to incur; therefore, the related health services costs are not mandated costs as defined by Government Code Section 17514.

Attachment— District's Response to Draft Audit Report



January 4, 2006

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Jim L. Spano, Chief Compliance Audits Bureau California State Controller Division of Audits P.C. Box 942850 Sacramento, CA 94250-5874

Re: Chapter 1, Statutes of 1984 Health Fee Elimination State Controller's Audit Fiscal Years: 2001-02 and 2002-03

Dear Mr. Spano:

This letter is the response of the Santa Monica Community College District to the letter from Jeffrey V. Brownfield, Chief, Division of Audits, dated December 19, 2005, and received by the District on December 23, 2005, which enclosed a draft copy of the State Controller's Office audit report of our Health Fee Elimination claims for the period of July 1, 2001 through June 30, 2003.

Finding 1 - Overstated indirect cost rates

The Controller asserts that the indirect cost method used by the District was inappropriate since it was not a cost study specifically approved by the federal government. The parameters and guidelines do not require that indirect costs be claimed in the manner described by the Controller. The parameters and guidelines for Health Fee Elimination (as last amended on May 25, 1989) state that "Indirect costs may be claimed in the manner described by the Controller in his claiming instructions." The parameters and guidelines do not require that indirect costs be claimed in the manner described by the Controller in the draft audit report.

The Controller's claiming instructions state that for claiming indirect costs, college districts have the option of using a federally approved rate from the Office of Management and Budget Circular A-21, a rate calculated using form FAM-29C, or a 7% indirect cost rate. The Controller claiming instructions were never adopted as rules or regulations, and therefore have no force of law. The burden is on the Controller to show that the indirect cost rate used by the District is excessive or unreasonable, which is the only mandated cost audit standard in statute (Government Code Section 17651(d)(2). If the Controller wishes to enforce other audit standards for mandated cost reimbursement, the Controller should comply with the Administrative Procedure Act.

Since the Controller has stated no legal basis to disallow the indirect cost rate calculation method used by the District, and has not shown a factual basis to reject the rates as unreasonable or excessive, the adjustments should be withdrawn.

Finding 2 - Understated authorized health fees revenues claimed

The District reported actual student health service revenues as a reduction of student health service costs. The Controller instead calculated "authorized health fee revenues," that is, the student fees collectible based on the highest student health service fee chargeable, rather the fee actually charged the student, or the fees actually collected.

"Authorized" Fee Amount

The Controller alleges that claimants must compute the total student health fees collectible based on the highest "authorized" rate. The Controller does not provide the factual basis for the calculation of the "authorized" rate, nor provide any reference to the "authorizing" source, nor the legal right of any state entity to "authorize" student health services rates absent rulemaking or compliance with the Administrative Procedure Act by the "authorizing" state agency.

Education Code Section 76355

Education Code Section 76355, subdivision (a), states that "The governing board of a district maintaining a community college may require community college students to pay a fee ... for health supervision and services ... " There is no requirement that community colleges levy these fees. The permissive nature of the provision is further illustrated in subdivision (b) which states "If, pursuant to this section, a fee is required, the governing board of the district shall decide the amount of the fee, if any, that a part-time student is required to pay. The governing board may decide whether the fee shall be mandatory or optional." (Emphasis supplied in both instances)

Parameters and Guidelines

The Controller asserts that the parameters and guidelines require that health fees authorized by the Education Code must be deducted from the costs claimed. This is a misstatement of the parameters and guidelines. The parameters and guidelines, as last amended on May 25, 1989, state that "Any offsetting savings... must be deducted from the costs claimed... This shall include the amount of (student fees) as authorized by Education Code Section 72246(a)." Therefore, while student fees actually collected are properly used to offset costs, student fees that could have been collected, but were not are not an offset.

Government Code Section 17514

The Controller relies upon Government Code Section 17514 for the conclusion that "[t]o the extent community college districts can charge a fee, they are not required to incur a cost." Government Code Section 17514, as added by Chapter 1459, Statutes of 1984, actually states:

"Costs mandated by the state" means any increased costs which a local agency or school district is required to incur after July 1, 1980, as a result of any statute enacted on or after January 1, 1975, or any executive order implementing any statute enacted on or after January 1, 1975, which mandates a new program or higher level of service of an existing program within the meaning of Section 6 of Article XIII B of the California Constitution."

There is nothing in the language of the statute regarding the authority to charge a fee, any nexus of fee revenue to increased cost, nor any language which describes the legal effect of fees collected.

Government Code Section 17556

The Controller relies upon Government Code Section 17556 for the conclusion that "the COSM shall not find costs mandated by the State if the school district has the authority to levy fees to pay for the mandated program or increased level of service." Government Code Section 17556 as last amended by Chapter 589/89 actually states:

"The commission shall not find costs mandated by the state, as defined in Section 17514, in any claim submitted by a local agency or school district, if after a hearing, the commission finds that: ... (d) The local agency or school district has the authority to levy service charges, fees, or assessments sufficient to pay for the mandated program or increased level of service. ..."

The Controller misrepresents the law. Government Code Section 17556 prohibits the Commission on State Mandates from finding costs subject to reimbursement, that is approving a test claim activity for reimbursement, where the authority to levy fees in an amount sufficient to offset the entire mandated costs. Here, the Commission has already approved the test claim and made a finding of a new program or higher level of service for which the claimants do not have the ability to levy a fee in an amount sufficient to offset the entire mandated costs.

The District requests that the audit report be changed to comply with the appropriate application of the Government Code concerning audits of mandate claims.

Sincerely.

Thomas J. Donner, Interim Superintendent/President

Santa Monica Community College District

CC: Keith Peterson

SixTen and Associates

State Controller's Office Division of Audits Post Office Box 942850 Sacramento, California 94250-5874

http://www.sco.ca.gov





January 4, 2006

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Jim L. Spano, Chief Compliance Audits Bureau California State Controller Division of Audits P.O. Box 942850 Sacramento, CA 94250-5874

Re: Chapter 1, Statutes of 1984 Health Fee Elimination State Controller's Audit Fiscal Years: 2001-02 and 2002-03

Dear Mr. Spano:

This letter is the response of the Santa Monica Community College District to the letter from Jeffrey V. Brownfield, Chief, Division of Audits, dated December 19, 2005, and received by the District on December 23, 2005, which enclosed a draft copy of the State Controller's Office audit report of our Health Fee Elimination claims for the period of July 1, 2001 through June 30, 2003.

Finding 1 - Overstated indirect cost rates

The Controller asserts that the indirect cost method used by the District was inappropriate since it was not a cost study specifically approved by the federal government. The parameters and guidelines do not require that indirect costs be claimed in the manner described by the Controller. The parameters and guidelines for Health Fee Elimination (as last amended on May 25, 1989) state that "Indirect costs may be claimed in the manner described by the Controller in his claiming instructions." The parameters and guidelines do not require that indirect costs be claimed in the manner described by the Controller in the draft audit report.

The Controller's claiming instructions state that for claiming indirect costs, college districts have the option of using a federally approved rate from the Office of Management and Budget Circular A-21, a rate calculated using form FAM-29C, or a 7% indirect cost rate. The Controller claiming instructions were never adopted as rules or regulations, and therefore have no force of law. The burden is on the Controller to show that the indirect cost rate used by the District is excessive or unreasonable, which is the only mandated cost audit standard in statute (Government Code Section 17651(d)(2). If the Controller wishes to enforce other audit standards for mandated cost reimbursement, the Controller should comply with the Administrative Procedure Act.

Since the Controller has stated no legal basis to disallow the indirect cost rate calculation method used by the District, and has not shown a factual basis to reject the rates as unreasonable or excessive, the adjustments should be withdrawn.

Finding 2 - Understated authorized health fees revenues claimed

The District reported actual student health service revenues as a reduction of student health service costs. The Controller instead calculated "authorized health fee revenues," that is, the student fees collectible based on the highest student health service fee chargeable, rather the fee actually charged the student, or the fees actually collected.

"Authorized" Fee Amount

The Controller alleges that claimants must compute the total student health fees collectible based on the highest "authorized" rate. The Controller does not provide the factual basis for the calculation of the "authorized" rate, nor provide any reference to the "authorizing" source, nor the legal right of any state entity to "authorize" student health services rates absent rulemaking or compliance with the Administrative Procedure Act by the "authorizing" state agency.

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The District requests that the audit report be changed to comply with the appropriate application of the Government Code concerning audits of mandate claims.

Sincerely,

Thomas J. Donner, Interim Superintendent/President

Santa Monica Community College District

CC: Keith Peterson

SixTen and Associates

CALIFORNIA COMMUNITY COLLEGES CHANCELLOR'S OFFICE

1102 Q STREET SACRAMENTO, CA 95814-6511 (916) 445-8752 HTTP://WWW.CCCCO.EDU



March 5, 2001

To:

Superintendents/Presidents Chief Business Officers

Chief Student Services Officers Health Services Program Directors

Financial Aid Officers

Admissions and Records Officers

Extended Opportunity Program Directors

From:

Thomas J. Nussbaum

Chancellor

Subject:

Student Health Fee Increase

Education Code Section 76355 provides the governing board of a community college district the option of increasing the student health services fee by the same percentage as the increase in the Implicit Price Deflator for State and Local Government Purchase of Goods and Services. Whenever that calculation produces an increase of one dollar above the existing fee, the fee may be increased by \$1.00.

Based on calculations by the Financial, Economic, and Demographic Unit in the Department of Finance, the Implicit Price Deflator Index has now increased enough since the last fee increase of March 1997 to support a one dollar increase in the student health fees. Effective with the Summer Session of 2001, districts may begin charging a maximum fee of \$12.00 per semester, \$9.00 for summer session, \$9.00 for each intersession of at least four weeks, or \$9.00 for each quarter.

For part-time students, the governing board shall decide the amount of the fee, if any, that the student is required to pay. The governing board may decide whether the fee shall be mandatory or optional.

The governing board operating a health services program must have rules that exempt the following students from any health services fee:

 Students who depend exclusively upon prayer for healing in accordance with the teachings of a bona fide religious sect, denomination, or organization.

- Students who are attending a community college under an approved apprenticeship training program.
- Students who receive Board of Governors Enrollment Fee Waivers, including students who demonstrate financial need in accordance with the methodology set forth in federal law or regulation for determining the expected family contribution of students seeking financial aid and students who demonstrate eligibility according to income standards established by the board of governors and contained in Section 58620 of Title 5 of the California Code of Regulations.

All fees collected pursuant to this section shall be deposited in the Student Health Fee Account in the Restricted General Fund of the district. These fees shall be expended only to provide health services as specified in regulations adopted by the board of governors. Allowable expenditures include health supervision and services, including direct or indirect medical and hospitalization services, or the operation of a student health center or centers, or both. Allowable expenditures exclude athletic-related salaries, services, insurance, insurance deductibles, or any other expense that is not available to all students. No student shall be denied a service supported by student health fee on account of participation in athletic programs.

If you have any questions about this memo or about student health services, please contact Mary Gill, Dean, Enrollment Management Unit at 916.323.5951. If you have any questions about the fee increase or the underlying calculations, please contact Patrick Ryan in Fiscal Services Unit at 916.327.6223.

CC: Patrick J. Lenz
Ralph Black
Judith R. James
Frederick E. Harris

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Market Sales (1986)

(0)2.49)	HEALTH FEE ELIMINATION CLAIM SUMMARY		FORM HFE-1.0
(01) Claimant:	(02) Type of Claim:		Fiscal Year
Claimant Name	Reimbursement	X	
Santa Monica Community College District	Estimated		2001-2002
(03) List all the colleges of the communi	ty college district identified in form HFE	-1.1, line (03)	
N	(a) lame of College		(b) Claimed Amount
1. Santa Monica College		\$	198,794.65
2.		\$	-
3.		\$	
4.		\$	-
5.		\$	-
6.		\$	-
7.		\$	
8.		\$	-
9.		\$	-
10.		\$	· · · · · · · · · · · · · · · · · · ·
11.		\$	-
12.		\$	
13.		\$	
14.		\$	
15.		\$	A
16.		\$	-
17.		\$,
18.		\$	-
19.		\$	-
20.		\$	-
21.		\$	
(04) Total Amount Claimed	[Line (3.1b) + line (3.2b) + line (3.3b) +line	-	198,795

MANDATED COSTS

K Tale K Tale	HEA	LTH FE	E ELIMINA	TION			Į.	FOI IFE	
		CLAIM :	SUMMARY	<u>′</u>				•• ••	1 8 8
(01) Claimant:			(02) Type o]		Fis	scal \	Year
Santa Monica Community College District			Estimated					20	001-2002
(03) Name of College	Si	anta Monid	a College				·		·
(04) Indicate with a check mark, the level at which year. If the "Less" box is checked, STOP, do not cor					reimbursement	in comparis	on to th	ne 198	36/87 fiscal
	Ľ	ESS	SAME	MORE					
			-		Direct Cost	Indirect Co 32.56	- 1		Total
(05) Cost of Health Services for the Fiscal	l year of C	laim			\$ 511,317	\$ 166	,485	\$	677,802
(06) Cost of providing current fiscal year h level provided in 1986/87	ealth sen	ices whicl	n are in exce	ss of the	\$ -	\$	_	\$	-
(07) Cost of providing current fiscal year h [Line (05) - line (06)]	ealth sen	rices at the	9 1986/87 lev	/el	\$ 511,317	\$ 166	,485	\$	677,802
(08) Complete Columns (a) through	h (g) to p	provide d	detail data	for health	fees		-		
Period for which health fees were collected	(a) Number of Full-time Students	(b) Number of Part-time Students	(c) Unit Cost for Full-time Student per Educ. Code § 76355	(d) Full-time Student Health Fees (a) x (c)	(e) Unit Cost for Part-time Student per Educ. Code § 76355	(f) Part-tir Stude Health F (b) x (nt ees	Fees Ha C	(g) dent Health That Could live Been ollected d) + (f)
Per fall semester				\$ -		\$			actual
Per spring semester				\$ -		\$	-	· 	actual
3. Per summer session				\$ -	·	\$	-		actual
Per first quarter				\$ -		\$	-	\$	_
5. Per second quarter				\$ -		\$	-	\$	<u>-</u> .
6. Per third quarter	<u> </u>			\$ -		\$	-	\$	
(09) Total health fees that have been colle	ected		[Line (8.1g) -	+ (8.2g) +	(8.6g)]			\$	479,007
(10) Sub-total			[Line ((07) - line (09)	l 			\$	198,795
Cost Reduction									
(11) Less: Offsetting Savings, if applicable (12) Less: Other Reimbursements, if appl								<u>\$</u> \$	
(13) Total Amount Claimed		· -	[Line	(10) - {line (11) + line (12)}]	 .			198 795

SANTA MONICA COMMUNITY COLLEGE DISTRICT CALCULATION OF INDIRECT COST RATE, FISCAL YEAR 2000-2001

REFERENCE	DESCRIPTION	2000-2001
(CCFS 311)		
INSTRUCTIONAL ACTIVITY		
	Instructional Costs	
· · · · · · · · · · · · · · · · · · ·	Instructional Salaries and Benefits	42,309,60
	Instructional Operating Expenses Instructional Support Instructional Salaries and Benefits	781,79
	Auxiliary Operations Instructional Salaries and Benefits	661,11
	TOTAL INSTRUCTIONAL COSTS 1	49,9'
	202122 ZIDIKOCHONAD COSIS I	43,802,5
	Non-Instructional Costs	
	Non-Instructional Salaries and Benefits	1,920,54
	Instructional Admin. Salaries and Benefits	3,805,14
	Instructional Admin. Operating Expenses	498,42
	Auxiliary Classes Non-Inst. Salaries and Benefits	2,307,49
	Auxiliary Classes Operating Expenses	3,052,22
	TOTAL NON-INSTRUCTIONAL COSTS 2	11,583,82
	TOTAL INSTRUCTIONAL ACTIVITY COSTS 3 (1 + 2)	55,386,33
DIRECT SUPPORT ACTIVITY		
DIADOL BULLORI ACITYITY	Direct Course C	· · · · · · · · · · · · · · · · · · ·
	Direct Support Costs	
	Instructional Support ServicesNon Inst. Salaries and Benefits	3,554,179
	Instructiona Support Services Operating Expeenses Admissions and Records	666,01
	Counselling and Guidance	3,111,760
	Other Student Services	7,016,19
	O MICH DELYICES	5,132,448
	TOTAL DIRECT SUPPORT COSTS 4	10.400.40
	BOLLOKI COSIS4	19,480,60
COTAL INSTRUCTIONAL ACTIVITY COSTS		
ND DIRECT SUPPORT COSTS 5 (3 + 4)		74.966.00
		74,866,986
	Indirect Support Costs	
	Operation and Maintenance of Plant	7,773,644
	Planning and Policy Making	4,011,766
	General Instructional Support Services	12,589,079
	TOTAL INDIRECT SUPPORT COSTS 6	24,374,489
OWAY MIGMINIONION AND A COMMISSION OF THE COMMIS		
OTAL INSTRUCTIONAL ACTIVITY COSTS AND		
<u> UPPORT COSTS, AND TOTAL INDIRECT SUPPO</u> (+6)=TOTAL COSTS	<u>PRT COSTS</u>	
+ 0/= 10/AL COS/S	· · · · · · · · · · · · · · · · · · ·	99,241,469
CITADO PER CO	STOC AT TO GLITTON TO THE	
SUPPORT CO	STS ALLOCATION RATES	· · · · · · · · · · · · · · · · · · ·
direct Support Costs Allocation Rate =	<u> </u>	
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	Total Indirect Supports Costs (6)	32.56%
	Total Instructional Activity Costs	—— \
	and Direct Support Costs (5)	$\overline{}$
rect Support Costs Allocation Rate =		
	Total Direct Survey Co. (1)	
	Total Direct Support Costs (4) Total Instructional Activity Costs (3)	35.17%
	TOTAL MINIMUCHORISI ACTIVITY COSTS (3)	
tal Support Cost Allocation		67.73%

School Mandated Cost Manual State of California MANDATED COSTS FORM **HEALTH FEE ELIMINATION** HFE-2.1 COMPONENT/ACTIVITY COST DETAIL Fiscal Year (01) Claimant 2001-2002 Santa Monica Community College District (b) (03) Place an "X" in column (a) and/or (b), as applicable, to indicate which health (a) FY FY Service was provided by student health service fees for the indicated fiscal year. 1986/87 of Claim X Х **Accident Reports Appointments** Х Х College Physician, surgeon Х X Dermatology, Family practice Internal Medicine χ Outside Physician **Dental Services** Χ Х Outside Labs, (X-ray, etc.,) Х Χ Psychologist, full services Χ Х Cancel/Change Appointments Χ Χ Registered Nurse **Check Appointments** Assessment, Intervention and Counseling Χ Χ Birth Control Χ Х Lab Reports Χ Χ Nutrition X Χ Test Results, office X Χ Venereal Disease Χ Communicable Disease Χ X Upper Respiratory Infection Χ Χ Eyes, Nose and Throat Χ X Eye/Vision Χ Х Dermatology/Allergy Χ Χ Gynecology/Pregnancy Service Χ Χ Neuralgic Χ Χ Orthopedic Χ Х Genito/Urinary Х Χ Dental Χ X X X X X X X Gastro-Intestinal Χ Stress Counseling Χ Crisis Intervention Child Abuse Reporting and Counseling X Substance Abuse Identification and Counseling Χ **Eating Disorders** Χ Weight Control Х Χ Personal Hygiene Χ Burnout Other Medical Problems, list Examinations, minor illnesses Recheck Minor Injury Health Talks or Fairs, Information X, Sexually Transmitted Disease Х Χ

Acquired Immune Deficiency Syndrome

Child Abuse

Χ

Χ

Χ

امد.. Mandated Cost Manual State of California MANDATED COSTS **FORM HEALTH FEE ELIMINATION** HFE-2.1 COMPONENT/ACTIVITY COST DETAIL Fiscal Year (01) Claimant 2001-2002 Santa Monica Community College District (b) (03) Place an "X" in column (a) and/or (b), as applicable, to indicate which health (a) ÈΥ FΥ Service was provided by student health service fees for the indicated fiscal year. of Claim 1986/87 Χ Χ Birth Control/Family Planning Χ Χ Stop Smoking Х Χ Library, Videos and Cassettes Χ Χ First Aid, Major Emergencies Х Х First Aid, Minor Emergencies Χ Χ First Aid Kits, Filled **Immunizations** Χ Х Diphtheria/Tetanus Χ Χ Measles/Rubella Χ Х Influenza Х Χ Information Insurance Χ On Campus Accident Χ Voluntary Χ Insurance Inquiry/Claim Administration Laboratory Tests Done Х Χ Inquiry/Interpretation Pap Smears Physical Examinations Χ **Employees** Χ Students Χ Athletes Medications Χ X X X **Antacids** Χ Antidiarrheal Х Aspirin, Tylenol, etc., Χ Skin Rash Preparations X Eye Drops Ear Drops Toothache, oil cloves Χ Stinakili Χ Х Midol, Menstrual Cramps Other, list---> Ibuprofen Parking Cards/Elevator Keys Tokens Χ Return Card/Key Χ Χ Parking Inquiry Χ Х **Elevator Passes** Χ

Temporary Handicapped Parking Permits

Juool Mandated Cost Manual State of California MANDATED COSTS **FORM HEALTH FEE ELIMINATION** HFE-2.1 COMPONENT/ACTIVITY COST DETAIL Fiscal Year (01) Claimant 2001-2002 Santa Monica Community College District (b) (a) (03) Place an "X" in column (a) and/or (b), as applicable, to indicate which health ÈΥ FΥ Service was provided by student health service fees for the indicated fiscal year. of Claim 1986/87 Referrals to Outside Agencies Χ Χ Private Medical Doctor Χ χ Health Department Х Χ Clinic Χ Χ Dental Χ Χ **Counseling Centers** Χ Χ **Crisis Centers** Х Χ Transitional Living Facilities, battered/homeless women Χ Χ Family Planning Facilities Χ Χ Other Health Agencies Tests Χ Χ **Blood Pressure** Χ Χ Hearing Χ Х **Tuberculosis** Χ Χ Reading Χ Χ Information Χ Χ Vision Χ Χ Glucometer Х Χ Urinalysis Х Hemoglobin **EKG** Χ Strep A Testing **PG Testing** Monospot Hemacult Others, list Miscellaneous Absence Excuses/PE Waiver X Х Allergy Injections Χ Χ Bandaids X Χ Booklets/Pamphlets X Χ **Dressing Change** X X X X Χ Rest X X Suture Removal Temperature Χ Weigh Χ Χ Information X Report/Form Wart Removal Х Others, list...condums for sale Committees Safety Environmental X Х Disaster Planning

Skin Rash Preparations

Eye Drops

HEALTH LOSTS

1-R2 AS OF 06/89/02 SANTA MONICA COMMUNITY COLLEGE	ACCOUNT LIST. FY 01-	IN L.O.P. SEQUENCE	PR IAL FUND-RES	OCESSED OB/29/02	PAGE	_
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PBD200-R2

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08 - GENERAL FUND-RESTRICTED

SANTA MONICA COMMUNITY COLLEGE

-R2 AS OF D6/89/02 Santa monica community college	ACCOUNT LIST FY 01	IN L.O.P. SEQUENCE -02 - GENI	NCE PROCESSED GENERAL FUND-RESTRICTED	CESSED 08/29/02 RICTED	2 PAGE 3
NI MUMBER PROG LOG ACCOUNT NAME	CURRENT	EXPEND	ENCUMB		LANCE LE
OBJECT 58000	0	00	00.	000	0 00
AJOR TOTAL OBJECT \$50000	4	38, 979, 09	6 0	00.	
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D3 - GENERAL FUND-RESTRICTED

SANTA MONICA COMMUNITY COLLEGE

11/2 a 6 T/1

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1 SEASON SOLUTION / JOHN PLANEMENT	9,865	00	00.	9	98	_
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-62035000-0958 INCORF/MONEYAR 648-1466-14		00	00	00,	9	
NCDSECTION OF THE PROPERTY.	> 6	DO.	00.	8		
2-64709000-0019 INTERNET ROYALTIES-KCRW	o c	5 6	00.	00.	00.	
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3-0000000-0000 TRANSTER 3N HOLDING ACCOUNT		200	200	20.		į
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14111 12300	,732,197	00.	5,204,411.26	0	472,21426-	_

SANTA MOUSCA COMMUNITY COLLEGE

03 - GENERAL FUND-RESTRICTED

239

PR0200-R1

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	Pursua	CLAIM FOR PAYM nt to Government Code HEALTH FEE ELIMIN	Section 17561	For State Controller Use (19) Program Number 00 (20) Date File//_(21) LRS Input//	
	(01) Claimant Identifi	cation Number			 nent Claim Data
L	S19385	cation Number.		Rembuisen	ient Olaini Data
	(02) Mailing Address			(22) HFE - 1.0, (04)(b)	\$ 165,612
E	Claimant Name			(23)	
	Santa Monica Commu	nity College District			
	County of Location	.		(24)	
	Los Angeles	·····		(05)	
	Street Address		·	(25)	
	1900 Pico Blvd. City	State	Zip Code	(26)	
	Santa Monica	CA	90405-1628	(20)	
1	Type of Claim	Estimated Claim	Reimbursement Claim	(27)	
	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,				
		(03) Estimated X	(09) Reimbursement	(28)	
		(04) Combined	(10) Combined	(29)	
		(05) Amended	(11) Amended	(30)	
	Fiscal Year of Cost	(06) 2003-2004	(12) 2002-2003	(31)	
	Total Claimed	(07)	(13)	(32)	
	Amount	\$ 170,000	\$ 165,612	(00)	
	Less: 10% Late Penalty \$1000	y, but not to exceed	(14) \$ -	(33)	
	Less: Estimate Claim F	Payment Received	(15) \$ -	(34)	· · · · · · · · · · · · · · · · · · ·
	Net Claimed Amount		(16) \$ 165,612	(35)	· · · · · · · · · · · · · · · · · · ·
	Due from State	(08) \$ 170,000	(17) \$ 165,612	(36)	
	Due to State		(18) \$ -	(37)	
	(38) CERTIFICATION	OF CLAIM	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	
	California for costs mandat any of the provisions of Go I further certify that there w	ed by Chapter 1, Statutes of 1 vernment Code Sections 1090 as no application other than fro	om the claimant, nor any grant or payr	987, and certify under penalty of ment received, for reimbursemen	perjury that I have not violated
	1987.	ogram of increased level of se	rvices of an existing program mandat	ed by Chapter 1, Statutes of 196	4, and Chapter 1118, Statutes of
			Claim are hereby claimed from the S hapter 1118, Statutes of 1987, set for		d/or actual costs for the
	Signature of Authoriz		Date	· /	
	(herul	Miller	//_	5/04	
	Cheryl Miller		Asso	c. V.P. Business Services	
	Type or Print Name		Title		
	(39) Name of Contact	Person or Claim	Telephone Number	(858) 514-8605	
	SixTen and	Associates	E-Mail Address	kbpsixten@aol.com	

	e. Pe		
State Controller's Office		School Mand	lated Cost Manua
	MANDATED COSTS HEALTH FEE ELIMINATION CLAIM SUMMARY		FORM HFE-1.0
(01) Claimant:	(02) Type of Claim:	,	Fiscal Year
Claimant Name	Reimbursement	X	
Santa Monica Community College District	Estimated		2002-2003
(03) List all the colleges of the commun	ity college district identified in form	HFE-1.1, line (03)	
	(a) Name of College		(b) Claimed

	(a) Name of College	(b) Claimed Amount	
1. Santa Monica City College		\$ 165,61	2.07
2.		\$	-
3.		\$	_
4.		\$	-
5.		\$	-
6.		\$	-
7.		\$. .
8.		\$	-
9.		\$	-
10.		\$	-
11.		\$	- ,
12. ·		\$	-
13.		\$	-
14.		\$	-
15.		\$	-
16.		\$	-
17.		\$	-
18.		\$	
19.		\$	-
20.		\$	
21.		\$	-
(04) Total Amount Claimed	[Line (3.1b) + line (3.2b) + line (3.3b) +line (3.21b)	\$ 165,	612

MANDATED COSTS

FORM

13/0/2407/4	HEA	LTH FE	E ELIMINA	TION			ŀ	IFE-	1.1
	<u> </u>	CLAIM	SUMMARY	<i>'</i>			<u> </u>		
(01) Claimant:			(02) Type o				Fis	scal Y	'ear
			Reimbursen	nent X					
Santa Monica Community College District			Estimated					20	02-2003
(03) Name of College	S	anta Monid	a City Collec	ge			· ·		
(04) Indicate with a check mark, the level at which year. If the "Less" box is checked, STOP, do not cor	health servi	ces were pro orm. No rein	vided during the abursement is a	fiscal year of llowed.	relmbursement	in comparis	on to ti	ne 198	6/87 fiscal
	L	ESS	SAME	MORE					
					Direct Cost	Indirect Co	st of:		Total
			-· <u></u>			33.499	6		
(05) Cost of Health Services for the Fiscal	year of C	laim			\$ 494,512	\$ 165,	612	\$ 6	560,124
(06) Cost of providing current fiscal year h level provided in 1986/87	ealth serv	ices which	are in exce	ss of the	\$ -	\$	-	\$	-
(07) Cost of providing current fiscal year h [Line (05) - line (06)]	ealth serv	vices at the	1986/87 lev	/el	\$ 494,512	\$ 165,	612	\$ 6	660,124
(08) Complete Columns (a) through	n (g) to p	orovide c	letail data	for health	fees			-	
	(a)	(b)	(c)	(d)	(e)	(f)			(g)
Period for which health fees were collected	Number of Full-time Students	Number of Part-time Students	Unit Cost for Full-time Student per Educ. Code § 76355	Full-time Student Health Fees (a) x (c)	Unit Cost for Part-time Student per Educ. Code § 76355	Part-tin Studer Health F (b) x (e	nt ees	Fees 1 Hav Co	ent Health That Could re Been ollected i) + (f)
Per fall semester				\$ -		\$	-		
Per spring semester				\$ -		\$	-		
3. Per summer session				\$ -		\$	-		
4. Per first quarter				\$ -		\$	-	\$	•
5. Per second quarter				\$ -		\$	-	\$	-
6. Per third quarter				\$ -		\$	-	\$	-
(09) Total health fee that could have been	collected		[Line (8	8.1g) + (8.2g)	+(8.6g)]			\$ 4	194,512
(10) Sub-total			[Line ((07) - line (09)					165,612
Cost Reduction								Ψ !	30,012
(11) Less: Offsetting Savings, if applicable								\$	
(12) Less: Other Reimbursements, if appli	cable							\$	
(13) Total Amount Claimed			[Line ((10) - {line (11)	+ line (12)}]			\$ 1	165,612

SANTA MONICA COMMUNITY COLLEGE DISTRICT CALCULATION OF INDIRECT COST RATE, FISCAL YEAR 2001-2002

REFERENCE	DESCRIPTION	2001 2000
(CCFS 311) INSTRUCTIONAL ACTIVITY		2001-2002
INSTRUCTIONAL ACTIVITY		
	Instructional Costs	
	Instructional Salaries and Benefits	
	Instructional Operating Expenses	48,137,4
	Instructional Support Instructional Salaries and Benefits	637,7
	Auxiliary Operations Instructional Salaries and Reposits	699,83
	TOTAL INSTRUCTIONAL COSTS 1	466,22
		49,941,3
	Non-Instructional Costs	
	Non-Instructional Salaries and Benefits	
	Instructional Admin. Salaries and Benefits	1,569,62
	Instructional Admin. Operating Expenses	4,398,51
	Auxiliary Classes Non-Inst. Salaries and Benefits	343,81
	Auxiliary Classes Operating Expenses	1,979,89
	TOTAL NON-INSTRUCTIONAL COSTS 2	2,979,85
	200182	11,271,6
	TOTAL INSTRUCTIONAL ACTIVITY COSTS 3 (1 + 2)	
	32231(aDAC11V11Y COSTS 3 (1 + 2)	61,213,0
DIRECT SUPPORT ACTIVITY		
	Direct Support Costs	
	Instructional Support ServicesNon Inst. Salaries and Benefits	
	Instructiona Support Services Operating Expeenses	4,094,91
	Admissions and Records	1,060,47
	Counselling and Guidance	3,213,76
	Other Student Services	7,876,313
	Caret Gradent Sci vices	5,557,855
	TOTAL DIDECT OF THE CO.	
	TOTAL DIRECT SUPPORT COSTS 4	21,803,31
OTAL INSTRUCTIONAL ACTIVITY COSTS	· · · · · · · · · · · · · · · · · · ·	
ND DIRECT SUPPORT COSTS 5 (3 + 4)		
		83,016,32
		95,020,52
	Indirect Support Costs	
	Operation and Maintenance of Plant	8,476,505
	Planning and Policy Making	
	General Instructional Support Services	4,295,609
	·	15,032,300
	TOTAL INDIRECT SUPPORT COSTS 6	AT 00 1 11
TAT TATERRIGINALITY		27,804,414
TAL INSTRUCTIONAL ACTIVITY COSTS AND	DIRECT	
PPORT COSTS, AND TOTAL INDIRECT SUPPO	RT COSTS	
+ 6) = TOTAL COSTS		
		110,820,739
SUPPORT CO.	STS ALLO CATION RATES	
irect Support Costs Allocation Rate =		-(
· · · · · · · · · · · · · · · · · · ·	Total Indianas C	
	Total Indirect Supports Costs (6)	33.49%
	Total Instructional Activity Costs	
	and Direct Support Costs (5)	
ect Support Costs Allocation Rate =		
		-
	Total Direct Support Costs (4).	35.62%
	Total Instructional Activity Costs (3)	33.02%



MANDATED COSTS HEALTH FEE ELIMINATION COMPONENT/ACTIVITY COST DETAIL

FORM HFE-2.1

HEALTH FEE ELIMINATION COMPONENT/ACTIVITY COST DETAIL	HF	E-2.1
Claimant	Fisca	l Year
ata Monica Community College District	2002	-2003
Place an "X" in column (a) and/or (b), as applicable, to indicate which health Service was provided by student health service fees for the indicated fiscal year.	(a) FY	(b) FY
Accident Reports	1986/87 X	of Clain
Appointments		
College Physician, surgeon	×	х
Dermatology, Family practice	l x	X.
Internal Medicine	^	^
Outside Physician	1	.,
Dental Services		Х
	i	
Outside Labs, (X-ray, etc.,)	X	X.
Psychologist, full services	X	Х
Cancel/Change Appointments	X	X
Registered Nurse	X	l \hat{x}
Check Appointments		^
Assessment, Intervention and Counseling		
Birth Control	X	x
Lab Reports	l x	X
Nutrition		
Test Results, office	X	X
Venereal Disease	X	Х
	X	Х
Communicable Disease	X	Х
Upper Respiratory Infection	X	Х
Eyes, Nose and Throat	X	Х
Eye/Vision	X	X
Dermatology/Allergy	X	X
Gynecology/Pregnancy Service	Î	X.
Neuralgic	x	
Orthopedic		X
Genito/Urinary	X	X
Dental	X	X
	X	Х
Gastro-Intestinal	X	Χ
Stress Counseling	X	. X
Crisis Intervention	x	Х
Child Abuse Reporting and Counseling	x	,,
Substance Abuse Identification and Counseling	x	Χ
Eating Disorders	x	X
Weight Control		
Personal Hygiene	X	Х
Burnout	X	Х
Other Medical Problems, list	X	X
The modical ropiditis, list		
Examinations, minor illnesses		
Recheck Minor Injury		
Health Talks or Fairs, Information		
Sexually Transmitted Disease		
Drugs	X	Х
	X	·X
Acquired Immune Deficiency Syndrome Child Abuse	X	Χ
Causa Antiga	. 1	

MANDATED COSTS HEALTH FEE ELIMINATION COMPONENT/ACTIVITY COST DETAIL	1	PRM ≣-2.1
(01) Claimant	Fiscal	Year
Santa Monica Community College District	2002	-2003
(03) Place an "X" in column (a) and/or (b), as applicable, to indicate which health Service was provided by student health service fees for the indicated fiscal year.	(a) FY 1986/87	(b) FY of Claim
Birth Control/Family Planning Stop Smoking Library, Videos and Cassettes	X X X	X X X
First Aid, Major Emergencies First Aid, Minor Emergencies First Aid Kits, Filled	X X X	X X X
Immunizations Diphtheria/Tetanus Measles/Rubella Influenza Information	X X X	X X X
Insurance On Campus Accident Voluntary Insurance Inquiry/Claim Administration		X X X
Laboratory Tests Done Inquiry/Interpretation Pap Smears	x	x
Physical Examinations Employees Students Athletes		X X X
Medications Antacids Antidiarrheal Aspirin, Tylenol, etc., Skin Rash Preparations Eye Drops Ear Drops	X X X X	X X X X
Toothache, oil cloves Stingkill Midol, Menstrual Cramps Other, list	X	X
Parking Cards/Elevator Keys Tokens Return Card/Key Parking Inquiry Elevator Passes Temporary Handicapped Parking Permits	X	X X X

State of California

State of California S of Mandated C	JUST WATIGAT	
MANDATED COSTS HEALTH FEE ELIMINATION COMPONENT/ACTIVITY COST DETAIL	1	RM E-2.1
(01) Claimant	Fiscal	Year
Santa Monica Community College District	2002	-2003
(03) Place an "X" in column (a) and/or (b), as applicable, to indicate which health Service was provided by student health service fees for the indicated fiscal year.	(a) FY 1986/87	(b) FY of Claim
Referrals to Outside Agencies Private Medical Doctor Health Department Clinic Dental Counseling Centers Grisis Centers Transitional Living Facilities, battered/homeless women Family Planning Facilities Other Health Agencies	X X X X X X	X X X X X X
Tests Blood Pressure Hearing Tuberculosis Reading Information Vision Glucometer Urinalysis Hemoglobin EKG Strep A Testing PG Testing Monospot Hemacult	X X X X X X	X X X X X X X
Others, list Miscellaneous Absence Excuses/PE Waiver Allergy Injections Bandaids Booklets/Pamphlets Dressing Change Rest Suture Removal Temperature Weigh Information Report/Form Wart Removal Others, listcondums for sale	X X X X X X X	X X X X X X X
Committees Safety Environmental Disaster Planning Skin Rash Preparations Eye Drops	X	X

10200-R2 AS OF 06/83/03 11 - SANTA MONICA COMMUNITY COLLEGE	ACCOUNT LIST FY 02-	IN L.O.P. SEOUENCE -03 - GENE	ERAL FUND-	PROCESSED 08/23/03 RESTRICTED	3 PAGE 1
CCOUNT NUMBER 18.1 PROG LOC ACCOUNT NAME	RREUDG	EXPEND	ERCUMB		LANCE L
ODE44000-0032 PHYSICAL & MENTAL/HEALTH SERVIC	105,940	9,778.	00.	00,	
NOW TEACL	0 6	00.	00.	00,	
08 JECT 12000	105, 340	109,778,00	00.	000	o > 1
SELOR/HRLY/SUM/HEALTH	0	00'	00'	00'	
1600-00644000-0032 PHYS & MENIAL/SUM/HEALTH SERVICES 1630-00644000-0032 PHYS & MENIAL/RECHEALTH SERVICES	0 C	6 6	<u></u>	0 6	90
-00644000-0032 PHYS & MENTAL/HRLY/SUM/HE	•		88		
PHYS & MENTAL/HRLY/WIN/HEALTH	0	6,784	00'	00'	6,784.80-
* SUB-IUIAL UBJECT	0		00 -	00 .	61.8
IXI (JOR TOTAL 08 JECT 10000	105,940	126,539,80	00'	00	20,539,80- 0
-0032 CLERICAL/HEALTH	0,21	63, 222, B	00	00	. 0 1 . 88 .
OTH CLAS/HEALTH SERVICE	182,869	90,498,		00'	629
* SUB-TOTAL OBJECT 21000	080	3,721.33	60	00.	641.33- D
		00	00	00	Ş
ī	0	00	00	00	İ
CLERICAL OVERTIME/H	0	297.	8	00	297.
-00644000-0032 OTH CLAS	۰,	7,022.	00 -	8.	7,022.41-
COORT TOUR THE TOUR TOUR TOUR TOUR TOUR TOUR TOUR TOUR	0	20.2	00,	00,	28
MAJOR TOTAL OBJECT 20000	243,080	261,041.61	00,	00,	17,961.61- 0
STRS/DTH-HEALTH SERVICES	9,728	588.0	00.	00.	139.92 4
300-00644000-0032 STRS/OTH CERT-HEALTH SERVICES	9	0,439.	00'	00'	4.62-
	TR1 791	16, 027, 70	0D '	00'	-3
30644000-0032 PERS/CLAS	S	5,	00.	00	393.08 7
* SUB-TOTAL 08JECT 32000	5,676	5,282,92	00,	00	393.08 7
1200-00644000-0032 DASDI/0TH-WEALTH SERVICES	13, 220	11,684.73	00.	00,	1,535,27 12
	5 G	200		3 6	300
OBJECT 33000	155	52.2	00.	00	ר ר
H/W-DTH	40,841	49,407,83	00	00	66.83-
-00644600-0032 H/H-OTH CERT-HEALTH S	Ę	4, 140.1	00.	20	567
* SUB-TOTAL OBJECT 34000	44,414	52,548,01	00.	00	4.01
	412	0	8	90	3.24 2
SULZOTH CERT-HEALTH		151.63	.	00.	. 83-

P80200-R2

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03 - GENERAL FUND-RESTRICTED

11 - SANIA MONICA COMMUNITY COLLEGE

-HEALTH SERVI				***************************************	***************************************	1
W/C-CLASSIFIED-MEALTH SERVICES W/C-CLASS-MEALTH SERVICES DB SECT 2600	CURRENT BUDGET	EXPEND	ENCUMB	PRE-ENC	BALANCE L	PCNT LEFT
W/C-CLASSIFIED-HEALTH W/C-CLAS-BEALTH SERVIC DB Serf Sendo		460,59	00,		30.41	9
	4,038 769 4,807	3,018.81 1,484.34 4,503.15	00 ' 00 '	00°	1,619.19 715.34- 303.85	25 0 6
82D0-00644000-0032 W/C CERT-HEALTH SERVICES 8300-00644000-0032 DISTR RETIRE/HEALTH SERVICES * SUB-TDTAL 08JECT 38000	0	0	00 '	00. 00.	00 ' 00 '	000
	89, 726	96,074.64	00.	00	6,348,64-	•
R BOOKS/HEALTH S Ject 42000	100	00°	00'	00'	100.00 100.00 I	000
3300-00644000-0032 SUBSCRIPTIONS/HEALTH SERVICES • SUB-TDTAL OBJECT 43000	0 01	00.	00	00.	100,00 100.00 1	100
00-00644000-0032 SUBSCRIPTIONS/HEALTH SERVICES	D	00.	00	00	00	•
5500-C.:644000-D032 SUPPLIES/HEALTH SERVICES 5501-00644000-D032 SUFTWARE LICENSE/HEALTH SERVICES	7,000 3,200	9, 057, 12 . D0	00 ·	00.	2,057.12-	100
03-00644000-0032 PC UP GRADES/HEALTH SERVICES ◆ SUB-TDTAL OBJECT 45000	0 10,200	9,057.12	00.	00	. DO.	۵-
AJDR TOTAL DBJECT 40000	-	7.	0α	00 ′	1,342.88	5
ILEAGE/HEALTH SERVICES ONFERENCE/HEALTH SERVICES OBJECT 52000	400	00 .	00.	00 .	400.00	001
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03 - GENERAL FUND-RESTRICTED

01 - SANTA MONICA COMMUNITY COLLEGE

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		COMMUNITY COLLEGE	į	ENERAL FUND-RESTRI	CTED	4	562 PB0200-R2

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-RI AS OF 06/83/03 Santa monica community college		STATE/OTH FUNDS-ETP	INCOME/STATE/CAC GRANT/KCRF	OTH STATE REVENUE/UAT	ACCDUNTS 82 4	REVENUE HOLDING	RESERVE	GRANT	GOODWILL	GRANT	PART CITY		INCOME/JOSTRACK-JOB CENTER	NCOME/BROADBAND-TELECOMN TRAIN	MCDME/FADISON IMERIER PROJECT	MCOME/APA/BIQMED: - 01-62	INCOME/APA-BIGHED 02/03		INCOME/ITLES INT'L TRADE	TOTAL THE MINICHIED DEVELOP TRAINING	NI-KCRW	PLIES K	SVC CTR-JOB FAIR	ST MONICA CITY COUNCIL/KCRW GRANT	: «C	INCOME/SIMON GRANT 02/03	INCOME/PUBLIC TELE ENT-KORM	INCOME/PUBLIC TELE ENT/KCRW	RNG	INCOME/THE INSURANCE - INT STU CTR.	INCOME/HEALTH SERVICES	<u> </u>	STUDENT PARKING FEES STAFF PARKING FFES	PARKING LDT INCOME	MATCH HDLDING		MATCH/FEDERAL WORK STUDY	INCUME/MATCH-KCRW-02/03 ERRDR ACCDUNT FOR OBJECT 8000	_

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