



March 15, 2013

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Ms. Heather Halsey, Executive Director
Commission on State Mandates
980 9th Street, Suite 300
Sacramento, CA 95814

RE: Extension to Develop an RRM for Public Records Act (02-TC-10 and 02 TC-51)

Dear Ms. Halsey:

The California State Association of Counties (CSAC) requests an extension of the April 19, 2013 hearing date to file an amended set of parameters and guidelines for the Public Records Act (PRA) test claim to include an RRM. The RRM will only apply to back years, either FY 2011-12 or FY 2012-13 to the 2001-02 fiscal year and provide for actual costs claims only on a go-forward basis. The final fiscal year of the RRM will be determined by the Department of Finance. Based on our discussion with the CSAC SB 90 Service staff that met with the Department of Finance and State Controller (SCO) earlier this week, we believe staff there is a reasonable opportunity to develop a proposed RRM with the Department of Finance and other local government associations. If that effort fails, it is our intention to pursue an RRM through the Commission's other option without DOF. CSAC plans to work closely with the California School Boards Association (CSBA), League of CA Cities (LCC), California Special Districts Association (CSDA) and the two test claimants on this matter.

An overview of the proposed RRM plan and schedule as follows:

1. Complete Draft Survey – End of March
2. Visit local agencies with the State Controller to field test the survey instrument – April
3. Survey the participants – May
4. Analyze and calculate the survey results – Mid June
5. Negotiate with DOF staff to reach agreement on a RRM – June & July
6. Submit the proposed amendment to the CSM within a week after we reach agreement to jointly go forward or for local agencies to pursue the RRM without DOF. The local associations are committed to doing everything possible to reach agreement with DOF.

As you know, the Governor has proposed to suspend the Public Records Act (PRA) beginning with the 2013-14 fiscal year. One benefit of delaying the adoption of the P's and G's is to have enough data by the May Revise to give the Governor and Legislature a better estimate of the potential cost in order to evaluate the impact of the suspension. If the state suspends the P's and G's for the 2013-14 fiscal year, that can be noted in the final copy.

Regards,

A handwritten signature in blue ink, appearing to read "Jean Kinney Hurst", with a long horizontal flourish extending to the right.

Jean Kinney Hurst
Senior Legislative Representative