



**JOHN CHIANG**  
California State Controller  
Division of Accounting and Reporting

July 22, 2011

Mr. Drew Bohan  
Executive Director  
Commission on State Mandates  
980 Ninth Street, Suite 300  
Sacramento, CA 95814

Re: Proposed Parameters and Guidelines  
California Public Records Act, 02-TC-10 and 02-TC-51  
Government Code Section 6252, et al.  
Los Angeles County and Riverside Unified School District, Claimants

Dear Mr. Bohan:

We have reviewed the proposed Parameters and Guidelines (P's & G's) for the California Public Records Act program submitted by the County of Los Angeles and Riverside Unified School District. Below are our comments and recommendations.

We found that the reimbursable activities listed under the "Scope of Reimbursable Activities" were numbered incorrectly, included several duplications, and were incomplete. Furthermore, the reimbursable activities listed were confusing, not specific, and needed clarification. These conclusions were established after comparing the proposed P's & G's with reimbursable activities listed in both the adopted Statement of Decision (SOD) and the reimbursable activities laid out in the Test Claim.

In order to reduce confusion, we recommend that the proposed P's & G's be redrafted to incorporate the seven reimbursable activities listed in the SOD or use the reimbursable activities laid out in the Test Claim attachments of Michael R. McDermott and Richard L. Castro. This would give the claimant a clearer understanding of what specific cost information is required when reporting "One-Time Activities" versus "Ongoing Activities".

Should you have any questions regarding the above, please contact Steve Purser at (916) 324-5729, or e-mail to [spurser@sco.ca.gov](mailto:spurser@sco.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "JAL", with a long horizontal flourish extending to the right.

JAY LAL, Manager  
Local Reimbursement Sections

Enclosures

**Attachment: Declaration of Michael R. McDermott**

One-time Activities

1. Develop policies, protocols.
2. Conduct training on implementing test claim legislation.
3. Purchase computers to monitor and document public record service actions.
4. Purchase or develop data base software for tracking and processing Public Record Act requests.
5. Develop a Web Site for public record disclosure requests.

Continuing Activities

I. Staff time for:

A. Station or branch personnel.

1. Assistance in defining telephone, walk-in or written requests.
2. Writing and logging request.
3. Station-level research.
4. If availability known, notify requestor.
5. Indicate date/time available.
6. If availability not known, forward request to central unit.

B. Central Unit personnel

1. Assistance in defining telephone, walk-in or written requests.
2. Writing and logging request.
3. Central Unit research.
4. If availability known, notify requestor.
5. Indicate date/time available.
6. If availability not known:
  - a. consult with specialized personnel.
  - b. document findings.
  - c. notify requestor of results.

C. County Counsel – legal services to implement and comply with the test claim legislation, including Govt Code 6253.1

II. Supplies and Materials

III. Contract Services – eg PC maintenance

IV. Travel



1 a. consult with specialized personnel

2 b. document findings

3 c. notify requestor of results.

4 C. County Counsel - legal services to implement and comply with  
5 the test claim legislation, including Govt Code 6253.1

6 II. Supplies and Materials

7 III. Contract Services – eg PC maintenance

8 IV. Travel

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