



## Cost Recovery Systems, Inc.

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February 23, 2011

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

Ms. Juliana Gmur  
MAXIMUS  
2380 Houston Avenue  
Clovis, CA 93611

RE: Draft Staff Analysis, Proposed Parameters and Guidelines  
Identity Theft (03-TC-08)

Dear Mr. Bohan,

I have reviewed the Proposed Parameters and Guidelines for the Identity Theft program and request more detailed clarifying language regarding eligible activities be included in the final Parameters and Guidelines.

The reimbursable activity to "Take a police report supporting a violation of Penal Code section 530.5" in cases of identity theft is identified, however, we believe that the language should clearly state that the time to "to draft, review and edit the identity theft report" is eligible for reimbursement.

These activities were allowed in similar programs: most recently in the Crime Statistics Report for the Department of Justice mandate (02-TC-04 and 02-TC-11) recently approved by the Commission. We would request that the same activities also be noted in the Identity Theft Ps and Gs and subsequent claiming instructions. We believe this change is consistent with the intent of the mandate and would avoid future confusion.

It is standard law enforcement policy to have all crime reports reviewed by supervisory or command staff. We recently sent a declaration supporting this identical allegation with for the recently approved "Crime Victims Reports for the Department of Justice" program in July, 2010. A declaration attesting to this fact was made by the City of Newark Police Department.

Thank you for the opportunity to comment on this draft staff analysis.

Sincerely,

A handwritten signature in black ink, appearing to read 'Annette Chinn'.

Annette Chinn  
President  
Cost Recovery Systems