

EDMUND G. BROWN JR. . GOVERNOR

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October 24, 2011

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

Dear Mr. Bohan:

RE: Proposed Parameters and Guidelines for Permanent Absent Voter II (03-TC-11) and Proposed Amendment to Parameters and Guidelines for the Permanent Absent Voters (CSM 4358) Mandates.

The Department of Finance (Finance) has reviewed the Commission on State Mandate's (Commission) draft staff analysis for the above-referenced Parameters and Guidelines (Ps & Gs).

Finance has a concern about the inclusion of ongoing activity six in the proposed Ps & Gs for the Permanent Absent Voter II mandate, "Process and count ballots received from voters on the permanent absent voter list in the same manner as all other absent voter ballots." It is not clear that this activity is reasonably necessary for the performance of the state-mandated program, which is limited to making an application for permanent absent voter status available to any voter. In addition, it would be inappropriate to include this activity because permanent absent voters are a subset of the absent voter population, which already allows them to file reimbursement claims under the Absentee Ballots program.

Nonetheless, Finance recommends the following be added to the clarifying language of the Permanent Absent Voter II Ps & Gs: "If costs to perform the activities identified above have been claimed under the Absentee Ballots program (CSM 3713), Permanent Absent Voter I program (CSM 4358), or any other program, the costs are not eligible for reimbursement under these parameters and guidelines."

Pursuant to section 1181.2, subdivision (c)(1)(E) of the California Code of Regulations, "documents that are e-filed with the Commission need not be otherwise served on persons that have provided an e-mail address for the mailing list."

If you have any questions regarding this letter, please contact Jeff Carosone, Principal Program Budget Analyst at (916) 445-8913.

Sincerely,

**NONA MARTINEZ** 

Assistant Program Budget Manager

Enclosure

Received October 24, 2011 Commission on State Mandates

Enclosure A

DECLARATION OF DEPARTMENT OF FINANCE CLAIM NO. CSM 4358 and 03-TC-11

1. I am currently employed by the State of California, Department of Finance (Finance), am familiar with the duties of Finance, and am authorized to make this declaration on behalf of Finance.

I certify under penalty of perjury that the facts set forth in the foregoing are true and correct of my own knowledge except as to the matters therein stated as information or belief and, as to those matters, I believe them to be true.

at Sacramento, CA

Jeff Carosone