



June 19, 2015

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

Request to Amend Parameters and Guidelines for the Immunization Records: Pertussis Program

Dear Ms. Halsey:

The Department of Finance (Finance) has reviewed the proposed amendments to the Parameters and Guidelines (Ps&Gs) submitted by the Desert Sands Unified School District for the *Immunization Records: Pertussis* mandated program (Program) (11-TC-02), and respectfully submits the following comments.

The proposed amendments would adopt a reasonable reimbursement methodology (RRM) for the Program. The RRM would replace the current cost reimbursement claims process and would be based on the cost reimbursement claims data submitted by 158 school districts to the State Controller's Office (SCO) for the 2012-13 fiscal year and applicable enrollment data provided by the California Department of Education. The proposed RRM would establish a per unit reimbursement rate of \$9.17 per eligible seventh grade student, as adjusted annually for inflation, and would reimburse school districts for costs associated with verifying that students entering the seventh grade have been immunized against pertussis, as appropriate.

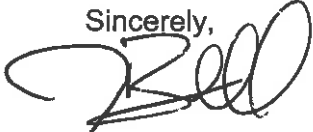
The state established the Mandate Block Grant program to reimburse local educational agencies for mandated activities on an average daily attendance basis; therefore, the Block Grant effectively functions as a RRM. The 2015 Budget adds the Program and \$1.7 million Proposition 98 General Fund to the Mandate Block Grant program to specifically reimburse local educational agencies for costs associated with the Program. To the extent that school districts desire the simplicity of per unit funding for mandated activities, they can participate in the Mandate Block Grant program.

Notwithstanding the Mandate Block Grant program, we believe it is premature to amend the Ps&Gs and adopt a RRM because the SCO has not conducted field audits of the reimbursement claims for the Program. Therefore, it is impossible to substantiate the validity of the costs claimed to date. Establishing a base funding level on unaudited claims could prove detrimental to the state if the true costs are ultimately determined to be lower.

Although the SCO has not conducted field audits of claims for the Program, the SCO annually audits the reimbursement claims of various school districts for various mandated programs. Based on audits over the past 11 years, the SCO disallows claimed costs in excess of 50 percent, on average. Given the historically high disallowance rate in audited claims, we do not believe it would be appropriate to adopt a RRM for the *Immunization Records: Pertussis* program based on unaudited data.

If you have any questions regarding this letter, please contact Ed Hanson, Principal Program Budget Analyst at (916) 445-0328.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Bell". The signature is stylized with a large, sweeping initial "J" and "B".

JEFF BELL
Program Budget Manager

DECLARATION OF SERVICE BY EMAIL

I, the undersigned, declare as follows:

I am a resident of the County of Sacramento and I am over the age of 18 years, and not a party to the within action. My place of employment is 980 Ninth Street, Suite 300, Sacramento, California 95814.

On June 22, 2015, I served the:

DOF Comments

Immunization Records - Pertussis, 14-PGA-01 (11-TC-02)

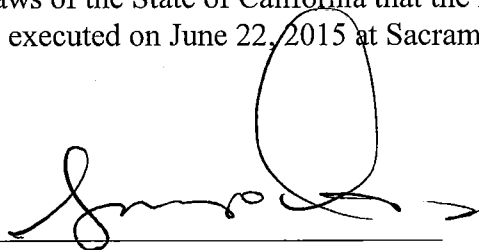
Health and Safety Code Section 120335

Statutes 2010, Chapter 434 (AB 354)

Desert Sand Unified School District, Requester

By making it available on the Commission's website and providing notice of how to locate it to the email addresses provided on the attached mailing list.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on June 22, 2015 at Sacramento, California.

A handwritten signature in black ink, appearing to read 'Lorenzo Duran', is written over a horizontal line. The signature is stylized and includes a large loop at the end.

Lorenzo Duran
Commission on State Mandates
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Sacramento, CA 95814
(916) 323-3562

COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 6/4/15

Claim Number: 14-PGA-01 (11-TC-02)

Matter: Immunization Records - Pertussis

Requester: Desert Sands Unified School District

TO ALL PARTIES, INTERESTED PARTIES, AND INTERESTED PERSONS:

Each commission mailing list is continuously updated as requests are received to include or remove any party or person on the mailing list. A current mailing list is provided with commission correspondence, and a copy of the current mailing list is available upon request at any time. Except as provided otherwise by commission rule, when a party or interested party files any written material with the commission concerning a claim, it shall simultaneously serve a copy of the written material on the parties and interested parties to the claim identified on the mailing list provided by the commission. (Cal. Code Regs., tit. 2, § 1181.3.)

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