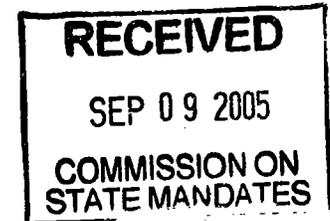




STEVE WESTLY
California State Controller
Division of Accounting and Reporting



August 23, 2005

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

RE: DRAFT STAFF ANALYSIS AND PROPOSED PARAMETERS AND GUIDELINES
THE STULL ACT, 98-TC-25
EDUCATION CODE SECTIONS 44660 – 44665 (FORMERLY ED. CODE §§ 13485 –
13490) STATUTES 1975, CHAPTER 1216; STATUTES 1983, CHAPTER 498;
STATUTES 1986, CHAPTER 393; STATUTES 1995, CHAPTER 392; STATUTES
1999, CHAPTER 4

Dear Ms. Higashi:

We have reviewed the draft staff analysis and proposed parameters and guidelines for program referenced above. We concur with your staff analysis and proposed revisions to the parameters and guidelines.

If you have any questions, please contact Ginny Brummels, Manager of the Local Reimbursements Section, at (916) 324-0256.

Sincerely,

JOHN A. KORACH, Chief
Division of Accounting and Reporting

JAK:glb

cc: Interested parties

PROOF OF SERVICE BY MAIL

I, the undersigned, declare as follows:

I am a citizen of the United States and a resident of the County of Sacramento. I am over the age of 18 years and not a party to the within action. My place of employment and business address is 3301 C Street, Suite 500, Sacramento, California 95816.

On September 2, 2005, I served the attached recommendation of the State Controller's Office by placing a true copy thereof enclosed in a sealed envelope addressed to each of the persons named below at the addresses shown and by depositing said envelopes in the United States mail at Sacramento, California, with postage thereon fully prepaid.

Mr. Steve Shields
Shields Consulting Group, Inc.
1536 36th Street
Sacramento, CA 95816

Ms. Jesse McGuinn
Department of Finance (A-15)
915 L Street, 8th Floor
Sacramento, CA 95814

Ms. Susan Geanacou
Department of Finance (A-15)
915 L Street, Suite 1190
Sacramento, CA 95814

Mr. Gerald Shelton
California Department of Education (E-08)
Fiscal & Administrative Services Division
1430 N Street, Suite 2213
Sacramento, CA 95814

Ms. Beth Hunter
Centration, Inc.
8316 Red Oak Street, Suite 101
Rancho Cucamonga, CA 91730

Mr. Edward E. Parraz
Grant Joint Union High School District
1333 Grand Avenue
Sacramento, CA 95838

Mr. Keith B. Peterson
SixTen & Associates
5252 Balboa Avenue, Suite 807
San Diego, CA 92117

Ms. Jeannie Oropeza
Department of Finance (A-15)
Education Systems Unit
915 L Street, 7th Floor
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Mr. Steve Smith
Steve Smith Enterprises, Inc.
4633 Whitney Avenue, Suite A
Sacramento, CA 95821

Mr. Jim Spano
State Controller's Office (B-08)
Division of Audits
300 Capitol Mall, Suite 518
Sacramento, CA 95814

Mr. Arthur Palkowitz
San Diego Unified School District
4100 Normal Street, Room 3159
San Diego, CA 92103-8363

Mr. Larry Phelps
Denair Unified School District
3460 Lester Road
Denair, CA 95316

Mr. Gene Sies
Lassen County Office of Education
472-013 Johnsonville Road North
Susanville, CA 96130

Mr. David E. Scribner
Scribner Consulting Group, Inc.
3840 Rosin Court, Suite 190
Sacramento, CA 95834

Mr. Jim Jagers
Axiom, Inc.
2440 Gold River Road, Suite 200
Gold River, CA 95670

Mr. Joe Rombold
School Innovations and Advocacy
11130 Sun Center Drive, Suite 100
Rancho Cordova, CA 95670

Dr. Carol Berg
Education Mandated Cost Network
1121 L Street, Suite 1060
Sacramento, CA 95814

Mr. Paul Warren
Legislative Analyst's Office (B-29)
925 L Street, Suite 1000
Sacramento, CA 95814

Ms. Ginny Brummels
State Controller's Office (B-08)
Division of Accounting and Reporting
3301 C Street, Suite 500
Sacramento, CA 95816

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 2, 2005, at Sacramento, California.



Philip Pangilinan