

**DEPARTMENT OF SOCIAL SERVICES**

744 P Street, Sacramento, CA 95814



March 11, 2010

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

**SUBJECT: REQUEST FOR EXTENSION TO RESPOND TO LOS ANGELES REVISED  
PARAMETERS AND GUIDELINES  
Case No. A-09-122**

Dear Ms. Higashi:

The California Department of Social Services (CDSS) requests a 14 day extension to respond to Los Angeles County's revised parameters and guidelines. The revised parameters and guidelines were received on or about February 1, 2010. The Commissions regulations at 2 CCR § 1187.9 authorizes the Commission to continue a hearing to another time or upon a clear showing of good cause, at the request of any party. This request is based on both the number and complexity of issues raised, and the fact that the individuals within CDSS who are assigned to this matter are subject to furloughs, which has reduced the time available for staff to perform their work assignments and has compressed the time they have available to devote to the issues at hand.

Los Angeles County's revised parameters and guidelines is a lengthy document with numerous attachments, including a recent decision of the Federal Ninth Circuit Court of Appeals. In these materials are descriptions of dozens of claimed law enforcement activities, to be included in the parameters and guidelines. Each one of these activities needs to be carefully evaluated to determine whether objections exist to inclusion of these activities in the parameters and guidelines. In addition, numerous county welfare department activities are proposed for inclusion in the parameters and guidelines. Each one of these activities needs to be carefully evaluated to determine whether objections exist to inclusion of these activities in the parameters and guidelines. In addition, due process costs are being requested for inclusion of these activities in the parameters and guidelines based on a recent court decision. This court decision and the issues surrounding it need to be carefully understood and evaluated in relation to CDSS' response to Los Angeles County's revised parameters and guidelines. Full consideration of these issues requires the involvement of several staff members at CDSS, and a significant amount of their time.

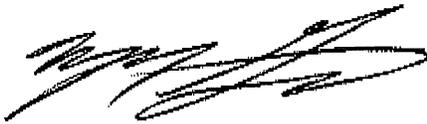
The amount of time available to staff at CDSS was significantly reduced as a result of the imposition of furloughs, which has reduced work time during most work weeks by twenty

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percent. At the same time, work assignments for these individuals have grown due to the State's fiscal emergency and attendant program reviews and program budget cuts. Despite CDSS staff best efforts to complete all of their assignment including its response in this matter, not all of those assignments can be completed in the reduced time available to staff.

Accordingly, CDSS respectfully submits that good cause exists for the Commission to extend CDSS' deadline to submit its response to March 26, 2010. Thank you for your attention to this matter. If you have any questions, please contact me at (916) 653-1879. You may also reach me through my Internet address at [mark.ginsberg@dss.ca.gov](mailto:mark.ginsberg@dss.ca.gov).

Sincerely,



MARK D. GINSBERG  
Senior Staff Attorney

c. Agenda Mailing List.

FAX

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Commission on State Mandates

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Commission on State Mandates

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California Department of Social Services

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SUBJECT: Revised Proposed Parameters and Guidelines – Case No. A-09-122  
Interagency Child Abuse and Neglect (ICAN) Investigation Reports  
Request for extension.

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