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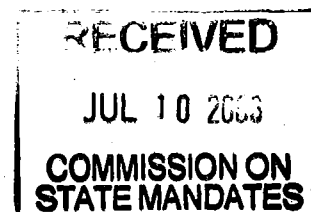
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June 30, 2006

Ms. Nancy Patton  
Assistant Executive Director  
Commission on State Mandates  
980 Ninth Street, Suite 300  
Sacramento, CA 95814



Subject: Comments on Draft Parameters and Guidelines  
Local Recreational Areas: Background Screenings (01-TC-11)

Dear Ms. Patton:

The City of Los Angeles, Department of Recreation and Parks, requests the Commission on State Mandates to include a reasonable reimbursement methodology (RRM) in the parameters and guidelines for claiming costs associated with the subject test claim (Local Recreational Areas: Background Screenings, 01-TC-11). We propose a RRM patterned after those adopted in the parameters and guidelines for the Rape Victim Counseling Center Notices (Chapters 999/91 and 224/92). The RRM would be for on-going costs -- initial costs would be claimed using the actual cost method as would the reimbursement for paying the Department of Justice (DOJ) processing fee for prospective employees. Our proposed RRM is as follows:

To claim on-going costs using the RRM methodology, a local agency shall use the following standard time:

- (1) 19 minutes – clerical staff time related to the subject state mandate
- (2) 6 minutes – technical staff time for processing the subject state mandate

Each standard time is multiplied by the average productive hour rate, including applicable indirect cost for each classification assigned state mandated duties and the results totaled to obtain a reimbursable unit cost. Such reimbursable unit cost is then multiplied by the total number of reported prospective employees and volunteers for which a mandated screening procedure is performed.


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The units of time used in the RRM are based primarily on a limited analysis of our own process. We are working with the California Parks and Recreation Society in an effort to gather a broad sample of local agency data to either validate the above time units or amend them to reflect average statewide times.

We will bring the results of that data to the pre-hearing on this matter which is scheduled for Thursday, July 27, 2006, at 10:30 a.m. in your offices.

Sincerely,



HAROLD T. FUJITA  
Director of Human Resources