



Fairfield-Suisun Unified School District

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"Fairfield-Suisun Unified School District is a premier learning community that empowers each student to thrive in an ever changing world."

November 7, 2017

RECEIVED

November 09, 2017

**Commission on
State Mandates**

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Ms. Heather Halsey
Executive Director
Commission on State Mandates
980 Ninth Street, Suite 300
Sacramento, CA 94814

**RE : Department of Finance Comments dated October 11, 2017 – Cal Grant:
Grade Point Average and Graduation Certification Test Claim (16-TC-02).**

Dear Ms. Exec. Director Halsey and Ms. Magee,

The Department of Finance stated the following:

- 1. The requirement for school districts to report grade point averages is not new.** Prior to the enactment of Chapter 679, Statutes of 2014, subdivision (c) of Education Code section 69432.9 specified the following:

"(c) The commission shall require that a grade point average be submitted for all Cal Grant A and B applicants, except for those permitted to provide test scores in lieu of a grade point average. **The commission shall require that each report of a grade point average include a certification, executed under penalty of perjury, by a school official, that the grade point average reported is accurately reported. The certification shall include a statement that it is subject to review by the commission or its designee.** The commission shall adopt regulations that establish a grace period for receipt of the grade point average and any appropriate corrections, and that set forth the circumstances under which a student may submit a specified test score designated by the commission, by regulation, in lieu of submitting a qualifying grade point average. It is the intent of the Legislature that high schools and institutions of higher education certify the grade point averages of their students in time to meet the application deadlines imposed by this chapter." [emphasis added]

Specifically, if asked by any student, the existing law would have required a school district or a county office of education to do all of the following (using the language in the written narrative of the claim):

"In a safe, welcoming, and supportive learning environment, we provide innovative educational opportunities to develop resilient students who are inspired to succeed"

Prepare for, provide, and attend training in order to instruct the employees in the existing requirements as referenced in (A)(1) of the written narrative.

Review records, correct, update, and submit grade point averages to the Student Aid Commission pursuant to the existing requirements as referenced in (A)(2) of the written narrative.

Include a certification to the Student Aid Commission, execute under penalty of perjury by a school official, that the grade point average is accurately reported as referenced in (A)(5) of the written narrative.

Therefore, Chapter 679, Statutes of 2014, does not represent a new program or higher level of service. To constitute a higher level of service there must be an increase in the level or quality of government services provided. The test claim statutes merely implement some changes that may increase the cost of providing services that were already required to be performed, but that does not result in a reimbursable state mandate.

CLAIMANT'S RESPONSE:

The Department of Finance's assertion that the enactment of Chapter 679, Statutes of 2014, subdivision (c) of Education Code section 69432.9 "merely implemented some changes that may increase costs of providing services that were already required to be performed", is not supported by the plain language of SB 2160.

Specifically Education Code section 69432.9 reads:

(c)(2) The commission shall require that a grade point average be submitted to it **electronically** on a standardized form for **all grade 12 pupils** at public schools, including charter schools, no later than October 1 of each academic year except for pupils who have opted out as provided in subdivision (d). Social security numbers shall not be included in the information submitted to the commission. However, if the commission determines that a social security number is required to complete the application for financial aid, the school, school district, or charter school may obtain permission from the parent or guardian of the pupil, or the pupil, if he or she is 18 years of age, to submit the pupil's social security number to the commission.

Prior to the passage of AB 2160 in 2014 school districts, county offices of education, and charter schools were not required to submit grade point averages to the California Student Aid Commission (CSAC) for **all** pupils enrolled in grade 12.

School districts, county offices of education, and charter schools were only required to submit grade point averages to the CSAC for those pupils who submitted applications requesting they be considered as a Cal Grant applicant. This fact is identified by the Department of Finance in their comments above:

"(c) The commission shall require that a grade point average be submitted for **all Cal Grant A and B applicants**".

This statement from the Department of Finance, on its face is not the same language "as all pupils enrolled in 12th grade" as the new requirement states, and clearly shows an increase in the level of service required by the school district, county office or charter school.

- 2. The claim does not indicate what time and costs are incurred by school districts, county offices of education to ensure the grade point average certification is submitted to the Student Aid Commission in time to meet the application deadline.** Without that information, it is unclear how the Commission on State Mandates would make a determination about the activities alleged in (A)(6) of the written narrative.

CLAIMANT'S RESPONSE:

The time and costs which are incurred by school districts, county offices of education and charter schools to ensure the grade point average certification is submitted to the Student Aid Commission (CSAC) in time to meet the application deadline are inherently included in item 5 of the Narrative, which states, "Time and costs.....including a certification to CSAC."

The Claimant did not include additional costs for ensuring the certification is submitted on time as this activity is inseparable from item 5 (see below). Claiming additional time and costs appear to be claiming duplicate costs thus omitted from the test claim submission. However, if the Commission would prefer, the District is more than happy to work to separate the two activities and would be happy to provide additional support for the process and costs included in the preparation and submission of the certification.

From Narrative Section 5 (A)

5. Time and costs incurred by school districts, county offices of education, and charter schools for including a certification to the CSAC, executed under penalty of perjury by a school official, that the grade point average is accurately reported. The certification shall include a statement that it is subject to review by the CSAC or its designee. AB 2160 - Statutes 2014, Education Code Sections 69432.9 (c)(3).
6. Time and costs incurred by school districts, county offices of education, and charter schools to ensure the grade point average certification is submitted to CSAC in time to meet the application deadline imposed by this chapter. AB 2160 - Statutes 2014, Education Code Sections 69432.9 (c)(5).

- 3. The claimant provides no evidence that a submittal of grade point averages by October 1 increases the cost of the alleged mandate.** The claimant asserts in (A)(8) of the written narrative that there are time and costs incurred by school districts, county offices of education, and charter schools to submit the grade point averages by October 1. These asserted activities are apparently separate from any time and costs associated with the submittal referenced in (A)(3) of the written narrative.

The claimant provides no evidence to suggest that additional time and costs are incurred to submit the information by October 1. Finance does not believe these represent new activities.

CLAIMANT'S RESPONSE :

Claiming additional time and costs to meet the October 1st deadline is included within the costs claimed for the calculation and keying of grades into the Cal Grant System (See Exhibit 1 below). If the District incurs additional costs it would be for staff time earlier in the school year than prior to the passage of the law. However, if the Commission would prefer, the District is more than happy to work to separate the two activities and would be happy to provide additional support for the costs specific to the earlier deadline.

EXHIBIT 1:

DISTRICT ACTUAL COSTS		FAIRFIELD SUGUN UNIFIED SCHOOL DISTRICT									
Fiscal	Costs first	Position	Average Salary & Benefits - Registrar 2016-17	Activity	Time per registrar/HRS	Number of individuals	Total time spent/HRS	total direct costs 16-17	Indirect costs 16-17 5.97%	cost per student	
2016-17	September 1,	AB 2160 Registrar	\$33.56	Training on reporting requirements GPA & graduation	4	5	20.00	\$671.29	\$40.08	\$0.45	
2016-17	September 1,	AB 2160 Registrar	\$33.56	Calculate and key grades into Cal Grant form -14min each		1594	371.93	\$12,483.77	\$745.28	\$8.30	
2016-17	September 1,	AB 2160 Registrar	\$33.56	Mailing opt out forms to all seniors	1	5	5.00	\$167.82	\$10.02	\$0.11	
2016-17	September 1,	AB 2160 Registrar	\$33.56	Comply with CSAC requests for social security numbers	0.25	5	1.25	\$41.96	\$2.50	\$0.03	
2016-17	September 1,	AB 2160 Registrar	\$33.56	Execute certification	0.08	5	0.40	\$13.43	\$0.80	\$0.01	
2016-17	September 1,	AB 1091 Registrar	\$33.56	Electronically submit graduation verification	9	5	45.00	\$1,510.40	\$90.17	\$1.00	
2016-17		Districtwide						\$14,888.66		\$9.90	

4. The statute imposes no requirements related to the verification of high school graduation or its equivalent. The claimant asserts in (A)(11) of the written narrative that there are time and costs incurred by school districts, county offices of education, and charter schools to provide verification of high school graduation or its equivalent and to electronically submit the graduate data for all former grade 112 pupils, including charter schools, in the prior academic year, except for pupils who have opted out, when required by the Student Aid Commission. The language in subdivision (a) of Education Code section 69432.92, which is cited by the claimant, only provides specific authorization to the Student Aid Commission. It does not impose a mandate on local agencies.

CLAIMANT'S RESPONSE:

The California Student Aid Commission began requiring verification of high school graduation from school districts, county offices of education and charter schools immediately following the passage of Education Code 69432.92. This is specifically noted in Education Code 69432.92 as:

(a) The commission may require verification of high school graduation or its equivalent to be electronically submitted for all former grade 12 pupils who graduated from public schools, including charter schools, in the prior academic year, except for pupils who have opted out as provided in subdivision (d) of Section 69432.9.

(b) If the commission requires verification of high school graduation or its equivalent pursuant to subdivision (a), the commission shall provide guidance to high schools or high school districts to ensure that high schools and high school districts verify the graduation of their pupils as soon as possible upon a pupil's graduation and no later than August 31 of the academic year following the pupils' graduation. This subdivision also applies to pupils who graduate during the summer following the grade 12 academic year.

In addition, during the 2016-17 fiscal year, the California Student Aid Commission issued two memos which prove the California Student Aid Commission also interpreted Education Code 69432.9 as imposing the requirement of verification of graduation upon school districts.

Please see EXHIBIT 2 on the following two pages:

EXHIBIT 2:



SPECIAL ALERT

STATE OF CALIFORNIA



Update from the California Student Aid Commission

March 27, 2017

GSA 2017-13

TO: High School District Superintendents
High School Principals
High School Counselors

FROM: Catalina G. Mistler *Catalina G. Mistler*
Deputy Director, Program Administration & Services Division

SUBJECT: **Important Reminders**

This Special Alert from the California Student Aid Commission (Commission) reminds district and high school administrators of the requirements of California Education Code 69432.9 pertaining to important deadlines.

2018-19 Cal Grant GPA Upload Submission

Education Code 69432.9 (c)(2) states that a GPA is to be submitted electronically to the Commission for all grade 12 pupils at public and charter high schools no later than October 1 of each academic year.

- GPAs for the class of 2018 can be electronically submitted starting May 2017.

Student Opt-Out Option

Education Code 69432.9 (d)(1) states that the school district or charter school is to notify, in writing, each grade 11 pupil (for a pupil under 18 years of age, his or her parent or guardian) no later than January 1 of their grade 11 academic year, the option to not be included in the GPA submission. The students and parents must be given at least 30 days to reply to the opt-out option.

- The opt-out notification should be sent to the class of 2018 before the end of their junior year.

High School Graduation Verification

Education Code 69432.92 (b) states that high schools and high school districts are to verify the graduation of their pupils as soon as possible upon their graduation and no later than August 31.

- The class of 2017 must have the graduation date verified in WebGrants by August 31, 2017. The capability to verify the high school graduation date will begin the first week of the students' reported month of graduation.

Need to contact us?

- Institutional Support phone number: (888) 294-0153
- E-mail: schoolsupport@csac.ca.gov

Working together to effectively promote education beyond high school!



OPERATIONS MEMO

Update from the California Student Aid Commission

STATE OF
CALIFORNIA



May 24, 2017

GOM 2017-16

TO: Financial Aid Administrators
High School Counselors
High School District Administrators

FROM: Catalina G. Mistler *Catalina G. Mistler*
Deputy Director, Program Administration & Services Division

SUBJECT: **2017-18 High School Graduation Verification**

This Operations Memo from the California Student Aid Commission (Commission) provides an update to [GSA 2017-13](#) regarding the 2017 high school graduation confirmation process for new 2017-18 Entitlement Cal Grant offered awardees.

Education Code 69432.92 (b) states:

High Schools and High School Districts are to verify the graduation of their pupils as soon as possible upon their graduation and no later than August 31 of the academic year following the pupil's graduation.

New Entitlement Cal Grant offered awardees:

- Must have their high school graduation confirmed prior to receiving a Cal Grant payment.
- Can self-certify their high school graduation at [WebGrants for Students](#).
- Will be notified regularly to confirm their high school graduation status.
- Will be withdrawn from the Cal Grant program if their high school graduation is not confirmed.

High Schools Confirming High School Graduation in WebGrants (WG)

- May certify 2017 graduates by using the "High School Graduation Verification" screen from the Grade Point Average (GPA) menu in WG. There are 3 different status options: "Graduated," "Not Graduated," or "Pending."
- Students who are marked "pending graduation" will have until December 31, 2017, to meet high school graduation requirements in order to remain eligible for a 2017-18 Cal Grant award.
 - In order to release the hold on a student's Cal Grant award, schools must submit a new graduation status in WG once the graduation requirements are satisfied.

P.O. Box 419028, Rancho Cordova, CA 95741-9028 Website: www.csac.ca.gov

5. Commission decisions make clear that any activities imposed on charter schools are not a state mandate. The Commission has determined that charter schools are not

- 5. Commission decisions make clear that any activities imposed on charter schools are not a state mandate.** The Commission has determined that charter schools are not eligible claimants subject to Article XIII B, section 6, of the California Constitution. Therefore, the references to time and costs incurred by charter schools in section (A) are irrelevant.

CLAIMANT'S RESPONSE:

Charter Schools are included in this test claim filing for two reasons: one, they are included in the plain language of the statutes referenced in the test claim and two, because if the COSM decision is ever reversed and Charter School costs are reinstated for mandate programs then including them in the test claim language now is a preemptive measure to insure Charter Schools would be eligible for reimbursement for this program.

- 6. The claimant's statement in (F)(iv) of the written narrative, that "none" of "the local agency's general purpose funds" are "available for this program" is inaccurate.** Funds apportioned to school districts through the Local Control Funding Formula (LCFF) pursuant to Article 2 (commencing with Section 42238) of Chapter 7 of Part 24 of Division 3 of Title 2 of the Education Code are available for these purposes and should offset any costs claimed by school districts. Similarly, funds apportioned to county offices of education through the County Local Control Funding Formula pursuant to Chapter 12.5 (commencing with Section 2574) of Part 2 of Division 1 of Title 1 of the Education Code are available for these purposes and should offset any costs claimed by county offices of education. Further, other state funds, including funds apportioned in the 2016-17 fiscal year through the College Readiness Block Grant, established in Chapter 29, Statutes of 2016, have been available for this program. Those funds also should offset any claims. The total of all of these funds exceeds the actual or estimated costs alleged by the claimant and the statewide cost estimate alleged in the claim.

CLAIMANT'S RESPONSE:

All School District Mandated Cost's claiming instructions issued by the State Controller's Office have specific line items (usually items 9 & 10) on the summary page which require the claimant identify any offsetting savings or other funding sources available for the specific mandate program being claimed. Additionally, in the current boiler plate School District Claiming Instructions the State Controller (SCO) specifically states:

VII. OFFSETTING REVENUES AND REIMBURSEMENTS

Any offsets the claimant experiences in the same program as a result of the same statutes or executive orders found to contain the mandate shall be deducted from the costs claimed. In addition, reimbursement for this mandate from any source, including but not limited to, service fees collected, federal funds, and other state funds, shall be identified and deducted from this.

It is the responsibility of each District to determine if (as the DOF puts it) "The total of all of these funds exceeds the actual or estimated costs alleged by the claimant", and not an amount outside sources or other government agencies can determine. To determine if these new laws create a new program or higher level of service is the COSM's responsibility. It is up to each claimant and the SCO to determine if the costs are 100% funded through other avenues.

Please review and let us know if you have any questions or need any additional information as we will be happy to provide it.

Thank you,

A handwritten signature in blue ink that reads "Michelle Henson". The signature is written in a cursive style with a large initial "M" and a large initial "H".

Michelle Henson
Assistant Superintendent of Business Services
Fairfield Suisun Unified School District

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.

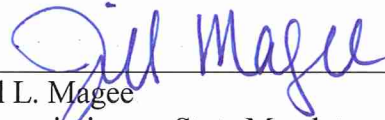
On November 9, 2017, I served the:

- **Claimant's Rebuttal Comments filed November 9, 2017**

Cal Grant: Grade Point Average and Graduation Certification, 16-TC-02
Education Code Sections 69432.9(c)(2), 69432.9(c)(3), 69432.9(c)(5),
69432.9(d)(1)(d)(2)(A); Statutes 2014, Chapter 679 (AB 2160); Education Code Sections
69432.92(a) and 69432.92(b); Statutes 2015, Chapter 637 (AB 1091); and Education
Code Sections 69432.9(c)(2) and (d)(1); Statutes 2016, Chapter 82 (AB 2908)
Fairfield-Suisun Unified School District, Claimant

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 November 9, 2017 at Sacramento, California.



Jill L. Magee
Commission on State Mandates
980 Ninth Street, Suite 300
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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 10/3/17

Claim Number: 16-TC-02

Matter: Cal Grant: Grade Point Average and Graduation Certification

Claimant: Fairfield-Suisun 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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