

**LAW OFFICES OF ARTHUR M. PALKOWITZ**

**12807 Calle de la Siena  
San Diego, CA 92130  
[law@artpalk.onmicrosoft.com](mailto:law@artpalk.onmicrosoft.com)  
Phone: 858.259.1055**

**RECEIVED**  
September 23, 2024  
**Commission on  
State Mandates**

September 24, 2024

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

Re: *Comments to Draft Proposed Decision  
Heating, Ventilation, and Air Conditioning (HVAC) Program, 23-TC-01  
Statutes 2022, Chapter 777, Sections 1, 2 (AB 2232); Education Code Sections  
17660, 17661, Effective January 1, 2023  
Hesperia Unified School District, Claimant*

Dear Ms. Halsey:

Hesperia Union School District (“Claimant”) provides the following comments on the Draft Proposed Decision (“DPD”).

*A. Introduction*

Test Claim 23-TC-01, Heating, Ventilation, and Air Conditioning (HVAC) Program addresses new legislation that includes Education Code Section 17660 and 17661 requiring schools in the State to ensure that facilities have heating, ventilation, and air conditioning (HVAC) systems that meet specified minimum ventilation rate requirements, unless the existing HVAC system is not capable of safely and efficiently providing the minimum ventilation rate, requiring a public school to ensure its HVAC system meets the minimum ventilation rates.

Assembly Bill 2232 also requires public schools to install filtration that achieves specified minimum efficiency reporting values (MERV) levels, determined by the school to be feasible with the existing HVAC system, as provided. (Assembly Bill No. 2232, Statutes 2022, Chapter 777, Sections 1, 2, Education Code Sections 17660, 17661, Enacted on September 29, 2022, Effective Date: January 1, 2023.)

The Draft Proposed Decision concluded the test claim was filed timely.

Comments to Draft Proposed Decision  
Heating, Ventilation, and Air Conditioning (HVAC) Program, 23-TC-01  
Statutes 2022, Chapter 777, Sections 1, 2 (AB 2232); Education Code Sections 17660,  
17661, Effective January 1, 2023  
Hesperia Unified School District, Claimant

1. Education Code section 17661(c) imposes a reimbursable state mandated program.<sup>1</sup>

AB 2232, School facilities: heating, ventilation, and air conditioning systems states:

This bill would require a covered school, defined as a school district, a county office of education, a charter school, a private school, the California Community Colleges, or the California State University, and would request the University of California, to ensure that facilities have heating, ventilation, and air conditioning (HVAC) systems that meet specified minimum ventilation rate requirements, unless the existing HVAC system is not capable of safely and efficiently providing the minimum ventilation rate, in which case the bill would require a covered school, and request the University of California, to ensure that its HVAC system meets the minimum ventilation rates in effect at the time the building permit for installation of that HVAC system was issued. The bill would also require a covered school, and request the University of California, to install filtration that achieves specified minimum efficiency reporting values (MERV) levels, determined by the school to be feasible with the existing HVAC system, as provided.

(AB 2232 Legislative Counsel Digest)

AB 2232 legislative enacted on September 22, 2022, added Education Code Section 17661 that required the following: “(c) (1) Subject to paragraph (2), a covered school shall, and the University of California is requested to, install filtration that achieves MERV levels of 13 or higher to the extent determined to be feasible and appropriate for the existing HVAC system, as determined by the school.” Attached is a declaration supporting the initial (one-time) costs incurred by the claimant for the purchase and installation of the MERV 13 filters.

It was not until AB 2232, that California schools were explicitly required to install MERV 13 or higher filters in their HVAC systems. AB 2232 set new ventilation standards and formalized the requirement for MERV 13 filters to be used, specifically to address both indoor air quality and public health concerns related to the spread of airborne pathogens. AB 2232 was

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<sup>1</sup> Claimant agrees with the DPD recommendation Education Code section 17660 and uncodified section 1, as added by the test claim statute does not impose a reimbursable state mandate as it does not require school districts to perform any activities.

Claimant agrees with the DPD recommendation Education Code section 17661 (a), (d), and (e), as added by the test claim statute does not impose a reimbursable state mandate since it does not require school districts to perform any activities.

enacted to deal with poor air quality in classrooms that is a pervasive problem that negatively impacts student health and learning.

AB 2232 and Education Code Section 17661(c) for the first time required schools to use MERV 13 filters. California Code of Regulations, title 24, part 6, section 120.1(c)(1)(B) requirements for ventilation and indoor air quality are applicable to “All occupiable spaces in hotel/motel buildings, and nonresidential buildings other than healthcare facilities shall comply with the applicable requirements of Section 120.1(a) through 120.1(g). (DPD Footnote 13; page 5) Healthcare facilities shall be ventilated in accordance with Chapter 4 of the California Mechanical Code.”<sup>2</sup> This requirement did not include schools.

This is further supported by Education Code section 17661 that states:

A covered school shall, and the University of California is requested to, ensure that facilities, including, but not limited to, classrooms for students, have HVAC systems that meet the minimum ventilation rate requirements set forth in Table 120.1-A of Part 6 (commencing with Section 100.0) of Title 24 of the California Code of Regulations, unless the existing HVAC system is not capable of safely and efficiently providing the minimum ventilation rate.

(Education Code section 17661(b)(1).)

California Code of Regulations, title 8, section 5143(d)(3). (Register 2003, No. 24.) (DPD Footnote 14; page 5) is under the Labor Code with the Occupational Safety and Health Standards Board (Board) authorized to develop health and safety requirements for the protection of workers. Regulations adopted by the Board (Title 8, Section 5142) require HVAC systems to be maintained and operated in accordance with the State Building Standards Code and continuously functioning during working hours with some exceptions (e.g., during scheduled maintenance)

2. Prior law did not require schools to have MERV 13 ventilation.

Prior to the enactment of AB 2232 (effective from January 1, 2023), California Education Code Section 17661 pertained to the general authorization for school districts to enter into contracts and agreements for the construction, reconstruction, or alteration of school buildings or other facilities. The section provided general guidelines on the responsibilities of school districts in relation to the acquisition, lease, and maintenance of school properties. It did not yet

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<sup>2</sup> SECTION 120.1 – REQUIREMENTS FOR VENTILATION AND INDOOR AIR QUALITY (a)  
General Requirements.

1. All occupiable spaces in hotel/motel buildings, and nonresidential buildings other than healthcare facilities shall comply with the applicable requirements of Section 120.1(a) through 120.1(g). Healthcare facilities shall be ventilated in accordance with Chapter 4 of the California Mechanical Code.

Comments to Draft Proposed Decision  
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incorporate the specific mandates regarding heating, ventilation, and air conditioning (HVAC) systems that AB 2232 introduced.

AB 2232 added specific requirements related to HVAC systems in schools, such as standards for ensuring proper air quality and temperature control, including regular inspections, maintenance, and reporting to ensure safe and healthy conditions in classrooms.

Prior to Assembly Bill 2232, MERV 13 filters were not required for all California schools. Although Assembly Bill 841 (passed in 2020) encouraged the use of MERV 13 filters in schools' HVAC systems and provided funding for ventilation upgrades, it did not make the use of these filters a statewide mandate.


([https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201920200AB841](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201920200AB841))

Title 8 of the California Code of Regulations generally deals with workplace safety, governed by Cal/OSHA (California Occupational Safety and Health Administration). Section 3205, along with its subsections like 3205.1 requirements due to the COVID-19 Outbreaks to install MERV 13 filters sunsets on February 3, 2025.<sup>3</sup> Claimant will continue to be required to comply with the requirements of Education Code Section 17661(c).

#### Certification

I certify by my signature below, under penalty of perjury under the laws of the State of California, that the statements made in this document are true and complete to the best of my own personal knowledge or based on information and belief and that I am authorized and competent to do so.

September 23, 2024

  
Arthur M. Palkowitz  
Representative for the Claimant

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<sup>3</sup> COVID-19 Outbreaks California Code of Regulations, title 8, section 3205.1(a)(1)(Register 2022, No. 18, eff. May 5, 2022) and California Code of Regulations, title 8, section 3205.1(f) (Register 2022, No. 18, eff. May 5, 2022) are in effect until February 3, 2025.

## Hesperia Unified School District

| School          | Total Labor Hours for Senior Maintenance Worker Hourly Rate with Statutories |                      |                       |  |              | Total Labor Cost |
|-----------------|--|----------------------|-----------------------|--|--------------|------------------|
|                 | Rooftop Labor Hours  | Portable Labor Hours | Rooftop and Portables | Senior Worker Hourly Rate with Statutories |              |                  |
| Carmel          | 8  | 2                    | 10                    | \$ 41.33                                   | \$ 371.97    |                  |
| Cottonwood      | 8  | 2                    | 44                    | \$ 41.33                                   | \$ 1,074.58  |                  |
| Hollyvale       | 8  | 2                    | 44                    | \$ 41.33                                   | \$ 1,074.58  |                  |
| Joshua Circle   | 10   | 4                    | 64                    | \$ 41.33                                   | \$ 1,529.21  |                  |
| Juniper         | 8  | 2                    | 44                    | \$ 41.33                                   | \$ 1,074.58  |                  |
| Kingston        | 10   | 4                    | 64                    | \$ 41.33                                   | \$ 1,529.21  |                  |
| Lime Street     | 8  | 4                    | 56                    | \$ 41.33                                   | \$ 1,322.56  |                  |
| Maple           | 8  | 3                    | 50                    | \$ 41.33                                   | \$ 1,198.57  |                  |
| Mesa Grande     | 10   | 4                    | 64                    | \$ 41.33                                   | \$ 1,529.21  |                  |
| Mesquite Trails | 8  | 2                    | 44                    | \$ 41.33                                   | \$ 1,074.58  |                  |
| Cedar Middle    | 12   | 5                    | 78                    | \$ 41.33                                   | \$ 1,859.85  |                  |
| Hesperia Jr     | 12   | 6                    | 84                    | \$ 41.33                                   | \$ 1,983.84  |                  |
| Mojave          | 12   | 8                    | 96                    | \$ 41.33                                   | \$ 2,231.82  |                  |
| Shadow Ridge    | 8  | 0                    | 32                    | \$ 41.33                                   | \$ 826.60    |                  |
| Total           |  |                      |                       |  | \$ 18,681.16 |                  |

Hesperia Unified School District

MERV 13 Filters  
Size of Filters

| School          | 20x30x2 | Cost Per<br>Filter | Cost        | 16x25x2 | Cost per<br>Filter | Cost        | 16x20x2 | Cost<br>per<br>Filter | Cost        | 20x20x2 | Cost per<br>Filter | Cost        | Total MERV<br>13 Filter<br>Cost |
|-----------------|---------|--------------------|-------------|---------|--------------------|-------------|---------|-----------------------|-------------|---------|--------------------|-------------|---------------------------------|
| Carmel          | 16      | \$ 18.04           | \$ 288.64   | 56      | \$ 11.51           | \$ 644.56   | 2       | \$ 9.95               | \$ 19.90    | 12      | \$ 11.51           | \$ 138.12   | \$ 1,022.16                     |
| Cottonwood      | 23      | \$ 18.04           | \$ 414.92   | 54      | \$ 11.51           | \$ 621.54   | 4       | \$ 9.95               | \$ 39.80    | 4       | \$ 11.51           | \$ 46.04    | \$ 1,099.28                     |
| Hollyvale       | 8       | \$ 18.04           | \$ 144.32   | 58      | \$ 11.51           | \$ 667.58   | 8       | \$ 9.95               | \$ 79.60    | 8       | \$ 11.51           | \$ 92.08    | \$ 937.54                       |
| Joshua Circle   | 28      | \$ 18.04           | \$ 505.12   | 44      | \$ 11.51           | \$ 506.44   | 4       | \$ 9.95               | \$ 39.80    | 4       | \$ 11.51           | \$ 46.04    | \$ 1,074.38                     |
| Juniper         | 32      | \$ 18.04           | \$ 577.28   | 44      | \$ 11.51           | \$ 506.44   | 4       | \$ 9.95               | \$ 39.80    | 4       | \$ 11.51           | \$ 46.04    | \$ 1,146.54                     |
| Kingston        | 30      | \$ 18.04           | \$ 541.20   | 54      | \$ 11.51           | \$ 621.54   | 4       | \$ 9.95               | \$ 39.80    | -       | \$ 11.51           | \$ -        | \$ 1,202.54                     |
| Lime Street     | 21      | \$ 18.04           | \$ 378.84   | 62      | \$ 11.51           | \$ 713.62   | 16      | \$ 9.95               | \$ 159.20   | 2       | \$ 11.51           | \$ 23.02    | \$ 1,263.17                     |
| Maple           | 24      | \$ 18.04           | \$ 432.96   | 54      | \$ 11.51           | \$ 621.54   | 8       | \$ 9.95               | \$ 79.60    | -       | \$ 11.51           | \$ -        | \$ 1,134.10                     |
| Mesa Grande     | 24      | \$ 18.04           | \$ 432.96   | 58      | \$ 11.51           | \$ 667.58   | 4       | \$ 9.95               | \$ 39.80    | -       | \$ 11.51           | \$ -        | \$ 1,140.34                     |
| Mesquite Trails | 22      | \$ 18.04           | \$ 396.88   | 54      | \$ 11.51           | \$ 621.54   | 2       | \$ 9.95               | \$ 19.90    | 12      | \$ 11.51           | \$ 138.12   | \$ 1,107.38                     |
|                 |         |                    |             |         |                    |             |         |                       |             |         |                    |             | \$ -                            |
| Cedar Middle    | 64      | \$ 18.04           | \$ 1,154.56 | 28      | \$ 11.51           | \$ 322.28   | 4       | \$ 9.95               | \$ 39.80    | 26      | \$ 11.51           | \$ 299.26   | \$ 1,666.27                     |
| Hesperia Jr     | 46      | \$ 18.04           | \$ 829.84   | 100     | \$ 11.51           | \$ 1,151.00 | 34      | \$ 9.95               | \$ 338.30   | 16      | \$ 11.51           | \$ 184.16   | \$ 2,411.22                     |
|                 |         |                    |             |         |                    |             |         |                       |             |         |                    |             | \$ -                            |
|                 |         |                    |             |         |                    |             |         |                       |             |         |                    |             | \$ -                            |
| Mojave          | 40      | \$ 18.04           | \$ 721.60   | 34      | \$ 11.51           | \$ 391.34   | 4       | \$ 9.95               | \$ 39.80    | -       | \$ 11.51           | \$ -        | \$ 1,152.74                     |
| IT              | 6       | \$ 18.04           | \$ 108.24   | 0       | \$ 11.51           | \$ -        | 3       | \$ 9.95               | \$ 29.85    | 11      | \$ 11.51           | \$ 126.61   | \$ 201.40                       |
| Total           |         |                    | \$ 6,927.36 |         |                    | \$ 8,057.00 |         |                       | \$ 1,004.95 |         |                    | \$ 1,139.49 | \$ 16,559.06                    |

**Test Claim: Heating, Ventilation, and Air Conditioning (HVAC)**

**Claimant: Hesperia Unified School District**

**Section: 6 Declaration- Dr. George Landon, Deputy Superintendent, Business Service,  
Hesperia Unified School District**

**SECTION NUMBER: 6**  
**Heading: DECLARATION**

**I, Dr. George Landon, Deputy Superintendent, Business Service, Hesperia Unified School District (Claimant) declare as follows:**

**1. I am currently employed with the Claimant, and I have been employed with the Claimant since July 1, 2016.**

**2. I have personal knowledge of the actual and estimated costs incurred by the Claimant for the School Facilities: Heating, Ventilation, and Air Conditioning ("HVAC") Systems commencing on January 1, 2023. The information contained in my declaration is from preparing and reviewing Claimant's business records, my personal knowledge and my information or belief pertaining to the Claimant's HVAC Systems.**

**3. The new requirements included in test claim statute Assembly Bill No. 2232, Statutes 2022, Chapter 777, Education Code Section 17661, Enacted on September 29, 2022, Effective January 1, 2023, include the activities of purchasing and installing MERV 13 air filters in the Claimant's facilities HVAC Systems.**

**4. The procedure for receiving and installing the MERV 13 air filters is as follows. MERV 13 air filters are delivered to different staging areas. They are delivered by the vendor and unloaded by our staff. The process was very easy with the previous MERV 9 1" air filters. The MERV 13 filters are 2" requiring more storage space. The filters are loaded and transported to the school facility site that may require multiple trips and additional labor hours.**

**5. Every school site has roof top units. Claimant uses a rope to lift the roof top units on to the roof. The filter changers use cordless drill motors and hand tools to remove and replace the filters. The coils are covered with the new box filters that takes additional time and multiple trips. There is triple the number of boxes because of the larger filters. The units are closed and the old filters are disposed of. There is a significant increase in labor due to the additional work involved in maintaining the units.**

**6. I have submitted documentation (HVAC 105-HVAC 106) stating the following: List of District Schools (22); Total Units (830); Total Roof Tops Replaced (815); Total Roof Tops Not Replaced (15); Total Wall Mounts (614); Total Wall Units Replaced (517); Total Roof Tops Not Replaced (97).**

Test Claim: Heating, Ventilation, and Air Conditioning (HVAC)

Claimant: Hesperia Unified School District

Section: 6 Declaration- Dr. George Landon, Deputy Superintendent, Business Service,  
Hesperia Unified School District

7. The Claimant first incurred increased one-time labor costs to replace and install the MERV 13 air filters on about January 1, 2023 in the amount of **\$18,681.16**. (Assembly Bill No. 2232, Statutes 2022, Chapter 777, Section 2, Education Code Section 17661(c)(1)).

8. The Claimant first incurred increased one-time costs on about January 1, 2023 for purchasing the MERV 13 air filters in the amount of **\$16,559.06**. (Assembly Bill No. 2232, Statutes 2022, Chapter 777, Section 2, Education Code Section 17661(c)(1)).


9. The Claimant's General funds are the funding sources for the initial purchasing of the MERV 13 air filter costs and the labor of replacing and installing the MERV 13 air filters.

10. The good repair, working order, and condition requirements of the Leroy F. Greene School Facilities Act of 1998 or its predecessor program, the State School Building Lease-Purchase Law of 1976 does not include Assembly Bill 2232 requiring public schools to install filtration that achieves specified minimum efficiency reporting values (MERV) levels, determined by the school to be feasible with the existing HVAC system. (Assembly Bill No. 2232, Statutes 2022, Chapter 777, Sections 1, 2, Education Code Sections 17660, 17661, Enacted on September 29, 2022, Effective Date: January 1, 2023)

11. I am unaware of any local, state, or federal funds or fee authority that may be used to offset the increased costs that will be incurred by claimant to implement the alleged mandate, including direct and indirect costs. This declaration is intended to provide additional information to my previous declarations.

I certify by my signature below, under penalty of perjury under the laws of the State of California, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief and I am authorized and competent to do so.

Dated: September 23, 2024

  
\_\_\_\_\_  
DR. GEORGE LANDON, DEPUTY  
SUPERINTENDENT, BUSINESS SERVICE  
HERSPERIA 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 September 23, 2024, I served the:

- **Current Mailing List dated September 4, 2024**
- **Claimant's Comments on the Draft Proposed Decision filed September 23, 2024**

*Heating, Ventilation, and Air Conditioning (HVAC) Program, 23-TC-01*  
Statutes 2022, Chapter 777, Sections 1, 2 (AB 2232);  
Education Code Sections 17660, 17661, Effective January 1, 2023  
Hesperia 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 September 23, 2024 at Sacramento, California.



David Chavez  
Commission on State Mandates  
980 Ninth Street, Suite 300  
Sacramento, CA 95814  
(916) 323-3562

# COMMISSION ON STATE MANDATES

## Mailing List

**Last Updated:** 9/4/24

**Claim  
Number:** 23-TC-01

**Matter:** Heating, Ventilation, and Air Conditioning (HVAC) Program

**Claimant:** Hesperia 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.)

**Amber Alexander**, *Department of Finance*

Education Systems Unit, 915 L Street, 7th Floor, Sacramento, Ca

Phone: (916) 445-0328

Amber.Alexander@dof.ca.gov

**Michael Alferes**, Fiscal and Policy Analyst, K-12, *Legislative Analyst's Office*

925 L Street, Suite 1000, Sacramento, CA 95816

Phone: (916) 319-8332

michael.alferes@lao.ca.gov

**Brooks Allen**, Executive Director, *California State Board of Education (SBE)*

1430 N Street, Suite 5111, Sacramento, CA 95814

Phone: (916) 319-0708

BRAllen@cde.ca.gov

**Lili Apgar**, Specialist, *State Controller's Office*

Local Reimbursements Section, 3301 C Street, Suite 740, Sacramento, CA 95816

Phone: (916) 324-0254  
lapgar@sco.ca.gov

**Socorro Aquino**, *State Controller's Office*  
Division of Audits, 3301 C Street, Suite 700, Sacramento, CA 95816  
Phone: (916) 322-7522  
SAquino@sco.ca.gov

**Harmeet Barkschat**, *Mandate Resource Services, LLC*  
5325 Elkhorn Blvd. #307, Sacramento, CA 95842  
Phone: (916) 727-1350  
harmeet@comcast.net

**Ginni Bella Navarre**, Deputy Legislative Analyst, *Legislative Analyst's Office*  
925 L Street, Suite 1000, Sacramento, CA 95814  
Phone: (916) 319-8342  
Ginni.Bella@lao.ca.gov

**Mike Brown**, *School Innovations & Advocacy*  
5200 Golden Foothill Parkway, El Dorado Hills, CA 95762  
Phone: (916) 669-5116  
mikeb@sia-us.com

**Guy Burdick**, Consultant, *MGT Consulting*  
2251 Harvard Street, Suite 134, Sacramento, CA 95815  
Phone: (916) 833-7775  
gburdick@mgtconsulting.com

**Shelby Burguan**, Budget Manager, *City of Newport Beach*  
100 Civic Center Drive, Newport Beach, CA 92660  
Phone: (949) 644-3085  
sburguan@newportbeachca.gov

**Edgar Cabral**, Fiscal and Policy Analyst, K-12, *Legislative Analyst's Office*  
925 L Street, Suite 100, Sacramento, CA 95816  
Phone: (916) 319-8332  
edgar.cabral@lao.ca.gov

**Evelyn Calderon-Yee**, Bureau Chief, *State Controller's Office*  
Local Government Programs and Services Division, Bureau of Payments,  
3301 C Street, Suite 740, Sacramento, CA 95816  
Phone: (916) 324-5919  
ECalderonYee@sco.ca.gov

**Veronica Causor-Lara**, Manager, Internal Audit, *San Jose Unified School District*  
855 Lenzen Avenue, San Jose, CA 95126

Phone: (408) 535-6000  
vcausorlara@sjusd.org

**Carolyn Chu**, Senior Fiscal and Policy Analyst, *Legislative Analyst's Office*  
925 L Street, Suite 1000, Sacramento, CA 95814  
Phone: (916) 319-8326  
Carolyn.Chu@lao.ca.gov

**Margaret Demauro**, Finance Director, *Town of Apple Valley*  
14955 Dale Evans Parkway, Apple Valley, CA 92307  
Phone: (760) 240-7000  
mdemauro@applevalley.org

**Andra Donovan**, *San Diego Unified School District*  
Legal Services Office, 4100 Normal Street, Room 2148, , San Diego, CA 92103  
Phone: (619) 725-5630  
adonovan@sandi.net

**Eric Feller**, *Commission on State Mandates*  
980 9th Street, Suite 300, Sacramento, CA 95814  
Phone: (916) 323-3562  
eric.feller@csm.ca.gov

**Donna Ferebee**, *Department of Finance*  
915 L Street, Suite 1280, Sacramento, CA 95814  
Phone: (916) 445-8918  
donna.ferebee@dof.ca.gov

**Chris Ferguson**, *Department of Finance*  
Education Systems Unit, 915 L Street, 7th Floor, 915 L Street, 7th Floor,  
Sacramento, CA 95814  
Phone: (916) 445-3274  
Chris.Ferguson@dof.ca.gov

**Brianna Garcia**, *Education Mandated Cost Network*  
1121 L Street, Suite 1060, Sacramento, CA 95814  
Phone: (916) 446-7517  
briannag@sscal.com

**Len Garfinkel**, General Counsel, *California Department of Education*  
1430 N Street, Sacramento, CA 95814  
Phone: (916) 319-0860  
lgarfinkel@cde.ca.gov

**Juliana Gmur**, *Commission on State Mandates*  
980 9th Street, Suite 300, Sacramento, CA 95814

Phone: (916) 323-3562  
juliana.gmur@csm.ca.gov

**Heather Halsey**, Executive Director, *Commission on State Mandates*  
980 9th Street, Suite 300, Sacramento, CA 95814  
Phone: (916) 323-3562  
heather.halsey@csm.ca.gov

**Tiffany Hoang**, Associate Accounting Analyst, *State Controller's Office*  
Local Government Programs and Services Division, Bureau of Payments,  
3301 C Street, Suite 740, Sacramento, CA 95816  
Phone: (916) 323-1127  
THoang@sco.ca.gov

**Kyle Hyland**, *School Services of California*  
1121 L Street, Suite 1060, Sacramento, CA 95814  
Phone: (916) 446-7517  
KyleH@sscal.com

**Jason Jennings**, Director, *Maximus Consulting*  
Financial Services, 808 Moorefield Park Drive, Suite 205, Richmond, VA  
23236  
Phone: (804) 323-3535  
SB90@maximus.com

**Angelo Joseph**, Supervisor, *State Controller's Office*  
Local Government Programs and Services Division, Bureau of Payments,  
3301 C Street, Suite 740, Sacramento, CA 95816  
Phone: (916) 323-0706  
AJoseph@sco.ca.gov

**Jennifer Kuhn**, Deputy, *Legislative Analyst's Office*  
925 L Street, Suite 1000, Sacramento, CA 95814  
Phone: (916) 319-8332  
Jennifer.kuhn@lao.ca.gov

**Lisa Kurokawa**, Bureau Chief for Audits, *State Controller's Office*  
Compliance Audits Bureau, 3301 C Street, Suite 700, Sacramento, CA 95816  
Phone: (916) 327-3138  
lkurokawa@sco.ca.gov

**Audin Leung**, Student Leader, *Free the Period California*  
1 Shield Ave, Pierce Co-op TB14, Davis, CA 95616  
Phone: (415) 318-9343  
freetheperiod.ca@gmail.com

**Ryan Lewis**, Superintendent, *Lake Elsinore Unified School District*  
545 Chaney Street, Lake Elsinore, CA 92530  
Phone: (951) 253-7000  
Ryan.Lewis@leusd.k12.ca.us

**Kristin Lindgren-Bruzzone**, General Counsel, *California School Boards Association*  
3251 Beacon Boulevard, West Sacramento, CA 95691  
Phone: (916) 669-3243  
klindgren-bruzzone@csba.org

**Diego Lopez**, Consultant, *Senate Budget and Fiscal Review Committee*  
1020 N Street, Room 502, Sacramento, CA 95814  
Phone: (916) 651-4103  
Diego.Lopez@sen.ca.gov

**Everett Luc**, Accounting Administrator I, Specialist, *State Controller's Office*  
3301 C Street, Suite 740, Sacramento, CA 95816  
Phone: (916) 323-0766  
ELuc@sco.ca.gov

**Jill Magee**, Program Analyst, *Commission on State Mandates*  
980 9th Street, Suite 300, Sacramento, CA 95814  
Phone: (916) 323-3562  
Jill.Magee@csm.ca.gov

**Darryl Mar**, Manager, *State Controller's Office*  
3301 C Street, Suite 740, Sacramento, CA 95816  
Phone: (916) 323-0706  
DMar@sco.ca.gov

**Tina McKendell**, *County of Los Angeles*  
Auditor-Controller's Office, 500 West Temple Street, Room 603, Los Angeles,  
CA 90012  
Phone: (213) 974-0324  
tmckendell@auditor.lacounty.gov

**Michelle Mendoza**, *MAXIMUS*  
17310 Red Hill Avenue, Suite 340, Irvine, CA 95403  
Phone: (949) 440-0845  
michellemendoza@maximus.com

**Eric Monley**, Interim Director of Fiscal Services, *San Jose Unified School District*  
855 Lenzen Avenue, San Jose, CA 95126

Phone: (408) 535-6000  
emonley@sjusd.org

**Marilyn Munoz**, Senior Staff Counsel, *Department of Finance*  
915 L Street, Sacramento, CA 95814  
Phone: (916) 445-8918  
Marilyn.Munoz@dof.ca.gov

**Melissa Ng**, Staff Finance Budget Analyst, *Department of Finance*  
Education, 915 L Street, 7th Floor, Sacramento, CA 95814  
Phone: (916) 445-0328  
Melissa.Ng@dof.ca.gov

**Michelle Nguyen**, *Department of Finance*  
Education Unit, 915 L Street, Sacramento, CA 95814  
Phone: (916) 445-0328  
Michelle.Nguyen@dof.ca.gov

**Andy Nichols**, *Nichols Consulting*  
1857 44th Street, Sacramento, CA 95819  
Phone: (916) 455-3939  
andy@nichols-consulting.com

**David Olney**, Superintendent, *Hesperia Unified School District*  
**Claimant Contact**  
15576 Main Street, Hesperia, CA 92345  
Phone: (760) 244-4411  
david.olney@hesperiausd.org

**Arthur Palkowitz**, *Law Offices of Arthur M. Palkowitz*  
**Claimant Representative**  
12807 Calle de la Siena, San Diego, CA 92130  
Phone: (858) 259-1055  
law@artpalk.onmicrosoft.com

**Kirsten Pangilinan**, Specialist, *State Controller's Office*  
Local Reimbursements Section, 3301 C Street, Suite 740, Sacramento, CA 95816  
Phone: (916) 322-2446  
KPangilinan@sco.ca.gov

**Roberta Raper**, Director of Finance, *City of West Sacramento*  
1110 West Capitol Ave, West Sacramento, CA 95691  
Phone: (916) 617-4509  
robertar@cityofwestsacramento.org

**Seth Reddy**, *San Jose Unified School District*  
855 Lenzen Avenue, San Jose, CA 95126  
Phone: (408) 535-6000  
sreddy@sjusd.org

**Sandra Reynolds**, President, *Reynolds Consulting Group, Inc.*  
P.O. Box 891359, Temecula, CA 92589-1359  
Phone: (888) 202-9442  
rcginc19@gmail.com

**Cindy Sconce**, Director, *Government Consulting Partners*  
5016 Brower Court, Granite Bay, CA 95746  
Phone: (916) 276-8807  
cindysconcegc@gmail.com

**Camille Shelton**, Chief Legal Counsel, *Commission on State Mandates*  
980 9th Street, Suite 300, Sacramento, CA 95814  
Phone: (916) 323-3562  
camille.shelton@csm.ca.gov

**Carla Shelton**, Senior Legal Analyst, *Commission on State Mandates*  
980 9th Street, Suite 300, Sacramento, CA 95814  
Phone: (916) 323-3562  
carla.shelton@csm.ca.gov

**Steve Shields**, *Shields Consulting Group, Inc.*  
1536 36th Street, Sacramento, CA 95816  
Phone: (916) 454-7310  
steve@shieldscg.com

**Natalie Sidarous**, Chief, *State Controller's Office*  
Local Government Programs and Services Division, 3301 C Street, Suite 740,  
Sacramento, CA 95816  
Phone: 916-445-8717  
NSidarous@sco.ca.gov

**Amy Tang-Paterno**, Educational Fiscal Services Consultant, *California Department of Education*  
Government Affairs, 1430 N Street, Suite 5602, Sacramento, CA 95814  
Phone: (916) 322-6630  
ATangPaterno@cde.ca.gov

**Jolene Tollenaar**, *MGT Consulting Group*  
2251 Harvard Street, Suite 134, Sacramento, CA 95815  
Phone: (916) 243-8913  
jolenetollenaar@gmail.com



**Brian Uhler**, Principal Fiscal & Policy Analyst, *Legislative Analyst's Office*  
925 L Street, Suite 1000, Sacramento, CA 95814  
Phone: (916) 319-8328  
Brian.Uhler@LAO.CA.GOV

**Adam Whelen**, Director of Public Works, *City of Anderson*  
1887 Howard St., Anderson, CA 96007  
Phone: (530) 378-6640  
awhelen@ci.anderson.ca.us

**Nate Williams**, Finance Budget Analyst, *Department of Finance*  
Education Unit, 915 L Street, 7th Floor, Sacramento, CA 95814  
Phone: (916) 445-0328  
Nate.Williams@dof.ca.gov

**Colleen Winchester**, Senior Deputy City Attorney, *City of San Jose*  
200 East Santa Clara Street, 16th Floor, San Jose, CA 95113  
Phone: (408) 535-1987  
Colleen.Winchester@sanjoseca.gov

**Jacqueline Wong-Hernandez**, Deputy Executive Director for Legislative  
Affairs, *California State Association of Counties (CSAC)*  
1100 K Street, Sacramento, CA 95814  
Phone: (916) 650-8104  
jwong-hernandez@counties.org

**Elisa Wynne**, Staff Director, *Senate Budget & Fiscal Review Committee*  
California State Senate, State Capitol Room 5019, Sacramento, CA 95814  
Phone: (916) 651-4103  
elisa.wynne@sen.ca.gov

**Bruce Yonehiro**, Chief Counsel, *California Department of Education*  
1430 N Street, Sacramento, CA 95814-5901  
Phone: (916) 319-0860  
BYonehiro@cde.ca.gov

**Helmholt Zinser-Watkins**, Associate Governmental Program Analyst, *State  
Controller's Office*  
Local Government Programs and Services Division, Bureau of Payments,  
3301 C Street, Suite 700, Sacramento, CA 95816  
Phone: (916) 324-7876  
HZinser-watkins@sco.ca.gov