



August 1, 2018

Department of Finance
Michael Cohn, Director
P98Certification@dof.ca.gov
State Capitol, Room 1145
Sacramento CA 95814

Joint Legislative Budget Committee
Philip Y. Ting, Vice Chair
Assemblymember.ting@assembly.ca.gov
1020 N St. Room 5019
Sacramento CA 95814

RE: [Comments to Department of Finance Proposed Calculations for 2009-2010 through 2016-2017](#)

Ladies and gentlemen:

I write regarding the Proposition 98 certification for years 2009-10 through 2016-17. As provided for in the education trailer bill (AB 1825), the proposed Proposition 98 certification and allocation schedule developed by the Department of Finance is subject to public review and comment. We note, however, that the information currently provided is not adequate to allow for a meaningful review in the time-frame provided by statute. Because much of the data provided is at an extremely high level, it cannot be evaluated without extensive effort to contact various agencies who might have more detailed information. We do not believe that this conforms with the intent of the statute to be transparent, and to provide sufficient data to be publicly available in the first instance so that interested persons can evaluate whether the certification is ultimately being done correctly.

More specifically, it is not possible to evaluate Department of Finance's decisions relating to certification for the subject years without having access to the actual Proposition 98 Excel computer model being used so that all relevant inputs and outputs can be reviewed and evaluated. These would allow for review of matters such as the details of specific rebenching decisions, breakdowns of prior year certifications and details about programmatic spending that comprise education spending for purposes of the Proposition 98 tests.

Please consider this letter as timely comments submitted by the California School Boards Association, as provided for under AB1825, and as our specific request for access to the information necessary to review the certifications completed by the Department of Finance for the years covered by the statute. Due to the timelines set forth in AB1825, it is imperative that we receive by August 15, 2018, the actual Proposition 98 Excel computer model being used so that we may be able to review the certifications completed by the Department of Finance.

Please provide the information we requested to the attention of Elaine Yama-Garcia, Interim General Counsel, at our address indicated on this letter.

Sincerely,

A handwritten signature in black ink that reads "Vernon M. Billy". The signature is fluid and cursive, with the first name being the most prominent.

Vernon M. Billy
CEO/Executive Director