

## **FINAL STATEMENT OF REASONS**

### **1) The Update to the Initial Statement of Reasons (ISR)**

There are no changes to the initial statement of reasons.

### **2) Imposition of Mandate on Local Agencies or School Districts**

The department's regulatory action amending sections 225.15, 225.24, 225.66, 225.69 and 225.72 and adopting Sections 225.73 in Article 3.6, Chapter 1, Division 1, of Title 13 of the California Code of Regulations, does not impose any mandate on local agencies or school districts and imposes (1) no cost or savings to any state agency, (2) no cost to any local agency or school district that is required to be reimbursed under Part 7 (commencing with Section 17500) of Division 4 of the Government Code, (3) no other discretionary cost or savings to local agencies, and (4) no cost or savings in federal funding to the state. No studies or data were relied upon to make this determination.

### **3) Summary of Comments Received and Department Response**

The proposal was noticed on September 4, 2020 and made available to the public from September 4, 2020 through October 19, 2020. During the 45-day comment period, the department received one comment.

The comment was received by email on October 19, 2020 from John Brueggeman, representing VITU, an electronic title and registration company. In its comment VITU expressed support for the proposed regulations. The department thanks VITU for its comment.

### **4) Documents Incorporated by Reference**

There are no documents being incorporated by reference.

### **5) Determination of Alternatives**

The department has determined that no reasonable alternative considered by the department or that has otherwise been identified and brought to the attention of the department would be more effective in carrying out the purpose for which the action is proposed, or would be effective as and less burdensome to affected private persons than the proposed action, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provisions of law. Not adopting these proposed regulations is not a suitable alternative because the existing regulations do not adequately include a due process (appeals and hearing) section. Except as set forth and discussed in the summary and responses to comments, no other alternatives have been proposed or otherwise brought to the department's attention.