

## **FINAL STATEMENT OF REASONS**

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

On April 20, 2018, the Department of Motor Vehicles (department) published for comment its proposed changes related to Disabled Person Parking Placards and License Plates. The comment period ended on June 4, 2018 with the department having received no comments on the proposed regulatory amendments or adoptions. The proposed action was submitted to the Office of Administrative Law (OAL) for final review on July 31, 2018. Upon its review, the OAL determined that the proposed action failed to meet clarity standards in the two forms, the initial statement of reasons and in the proposed regulatory text. Specifically, the OAL determined that the changes to the Application for Disabled Person Parking Placards and Plates, form REG 195, were not sufficiently described in the initial statement of reasons that was provided for public comment. In response to OAL's findings, the department amended the REG 195 to provide necessity and make other clarifying changes to the proposed regulatory text.

The department provided the amended regulatory text, the amended form REG 195, the form REG 256, and the addendum to the initial statement of reasons to the public for a comment period of 15 days. The comment period began on October 25, 2018 with the department posting the amendments on its website and by email to interested parties. The comment period ended on November 9, 2018 with the department having received no comments.

The Addendum to the Initial Statement of Reasons is hereby incorporated by reference. The documents were all made available to the public pursuant to Government Code section 11347.1.

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

The department's regulatory action 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 April 20, 2018, and made available to the public from April 20, 2018 through June 4, 2018. The department received no comments during the 45-day comment period.

#### **4) Forms Incorporated by Reference**

The following forms were incorporated by reference:

- Application for Disabled Person Placard or Plates, form REG 195 (Rev. 4/2018)
- Statement of Facts, form REG 256 (REV. 8/2008)

These forms are not being published in the California Code of Regulations because it would be impractical and cumbersome to do so. However, the forms were made available to interested parties during the public comment period and no comments were received related to the forms.

#### **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.

#### **6) Non-Duplication**

Section 182.03 repeats Vehicle Code section 22511.55(c). This duplication is necessary to satisfy the “clarity” standard of Government Code section 11349.1(a)(3) in order to have necessary information concentrated in a single location.