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RECEIVED
July 20, 2015
Commission on State Mandates

July 20, 2015

Heather Halsey
Executive Director
COMMISSION ON STATE MANDATES
980 9th Street, Suite 300
Sacramento, CA 95814

Re: Claimants' Comments on Draft Proposed Decision
California Assessment of Student Performance and Progress (CAASPP)
Test Claim 14-TC-01

Dear Ms. Halsey:

The following is provided in response to the Draft Proposed Decision ("DPD") dated June 1, 2015. As will be explained in further detail below, Claimants contend the following:

1. Claimants have met their burden in providing evidence that the mandated costs will significantly exceed $145 million identified as offsetting revenue.

2. The test claim statutes and regulations require ongoing administration of a computer-based assessment.

3. Claimants did not need to include the alleged emergency regulations as amended by Register 2014, No. 6.

* * *

1. Claimants have met their burden in producing evidence that the mandated costs will significantly exceed $145 million identified as offsetting revenue.

A. CAASPP is a State Mandate.

The Commission properly agreed with Claimants that "California was compliant with NCLB's requirement to administer assessments to determine students' levels of academic achievement under STAR, but the Legislature chose, without any change to NCLB, to adopt a new assessment (computerized CAASPP tests) regime that was much more expansive (and expensive)." (DPD, p. 15 [quoting Claimants' March 13, 2015 Comments].) When the State enacts legislation to comply with a federal mandate, the activities required by the legislation impose a state-mandated program if the manner of implementation of the federal program is left

to the true discretion of the state. (*Hayes v. Commission on State Mandates*, (1992) 11 Cal.App.4th 1564, 1593-1594.)

As a result, "[s]chool districts [and county offices of education] were not required under prior law to provide computers and adequate technology necessary to administer standardized assessments under the STAR program." (DPD, p. 70.) Thus, the DPD concluded that the test claim statutes and regulations did compel "an increase in service, and a new requirement, inherent in the administration of the new CAASPP tests via computer." (*Id.*, p., 69.)

B. There is Strong Evidence of Insufficient State Funding Commencing on July 1, 2014

The DPD erroneously concluded that "the State has appropriated revenues sufficient to fund the cost of both mandated activities in the 2014-2015 Budget Act and, thus, there are no costs mandated by the state beginning July 1, 2014." (DPD, p. 17.) The DPD similarly stated that, "[a]bsent substantial evidence in the record, the funding is sufficient as a matter of law to cover the costs of the mandated activities, is required to be applied to the activities, and bars a finding of costs mandated by the state." (*Id.*, p. 78.) Additionally, the DPD also erred in asserting that Claimants "have made no effort to introduce evidence in the record that [$145 million] is insufficient as a matter of law" to cover the cost of the mandated activities. (*Id.*, p. 81.)

To begin, Claimants' assertions of funding insufficiency are supported by uncontroverted evidence in the record, as the Department of Finance has not introduced any evidence to contradict them. The DPD is also incorrect to fault Claimants for only submitting estimates of their costs for 2014-15 given that the 2014-15 fiscal year was still in progress when the estimated increased costs were provided in support of the test claim. Additionally, the DPD's reference to a "substantial evidence" requirement is baseless as there is no such requirement at this stage in the process. Rather, the "substantial evidence" standard is applied in reconsideration proceedings to set aside a Commission decision, not in establishing costs for a mandate determination. (Gov. Code, § 17559, subd. (b).)

Even if there was a substantial evidence requirement, this burden was met. The five claimants alone alleged a total of more than $15 million in increased costs for 2014-2015.[1] (DPD, p. 38.) These costs, extrapolated out to all districts in the state greatly, exceed the $145 million identified as offsetting revenue.

The DPD also ignored results from the California Educational Technology Professionals Association ("CETPA") survey that found that the available funding was insufficient to meet the

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[1] The DPD did not include Claimant Vallejo City Unified School District costs. (DPD, p. 38)

SBAC-related technology need for a significant number of school districts. That survey made the following findings:

> While the one-time Common Core funds (which are unclear for the near future) are helpful in the short term, they do not resolve the on-going demands associated with adequate staffing, staff training, equipment replacement, software purchase/licensing updating, broadband maintenance, and appropriate facilities - just to name a few. Too often the conversations regarding technology-readiness in schools focus on the "devices" without a fair consideration of the critically important role of staffing, maintenance, software, and planning that must take place in order to make those devices work as intended. (CETPA Comments filed March 13, 2015.)
>
> Notably, most districts and COEs spent more than half of this funding on professional development and instructional materials rather than technology. Finally, districts and COEs responded that the survey did not capture the extensive staffing and resources required for districts and COEs to be as ready as they were to administer the assessment and the negative impact (financial and otherwise). (CETPA Comments filed March 13, 2015.)

These survey results were further supported by comments submitted from Santa Cruz City Schools, Belmont Redwood Shores School District, Cupertino Union School District, Del Norte County Office of Education, Orange County Board of Education, San Lorenzo Valley Unified School District, Santa Rosa City Schools District, Tulare Joint Union School District and Visalia Unified School District, informing the Commission of the amount of costs incurred and/or the insufficient amount of funding they have been allocated to administer CAASPP.

This array of evidence is sufficient to demonstrate the inadequate funding provided to cover the cost of the mandated activities.

To further bolster the fact that the State has not provided school districts and county offices of education (COEs) with sufficient funding to cover the cost of the mandated activities, Claimants are including additional evidence. Attached to this comment are letters from 77 districts and COEs that detail the technology-related Smarter Balanced Assessment Consortium ("SBAC") costs they are estimated to have incurred 2013-14 and 2014-15.

As explained in the Appendix to this comment, Claimants used the information in these letters to calculate that it costs an average of at least $183 per test-taker to administer the SBAC. In contrast, the approximately $145 million that the DPD claims is provided by the State to administer the CAASPP (including the SBAC) provides no more than $44 per SBAC test-taker.[2]

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[2] This calculation is detailed in the Appendix as well.

In other words, the statewide funding identified represents less than 25% of the costs to be incurred by school districts, and probably less. This deficit should not come as a surprise given the differences in the SBAC as compared with the CSTs in mathematics and English Language Arts – the latter was administered via paper and pencil whereas the former is administered via a computing device required to be connected to the Internet.

Claimants anticipate that some may express concern regarding the accuracy of these estimates, even though no proof is likely to be offered to justify such concerns. Yet the magnitude of difference between the cost of the SBAC mandate and the money made available to fund the mandate is such that any inaccuracies that might exist would not be significant enough to undermine the conclusion that the State has provided insufficient funding for the SBAC mandate.

Additionally, although Claimants' estimated costs need not conform to any specific statutory standards, they are in conformity with the requirements of Government Code section 17518.5. The cost information is derived from a representative sample of eligible districts and COEs and the cost information was collected, analyzed, and presented by the California School Boards Association. (Gov. Code, § 17518.5, subd. (b).) The methodology uses a simple, cost-efficient survey to collect accurate information that accounts for the variation in costs among school districts and COEs. (*Id.*, subd. (c).) The methodology is based on approximations of local costs mandated by the State that averages costs over the course of the first two years of an on-going multiyear mandate. (*Id.*, subd. (d).)

2. <u>The test claim statutes and regulations require ongoing administration of a computer-based assessment.</u>

The DPD properly concluded that there was a mandate "inherent in the administration of the new CAASPP tests via computer." (DPD, p. 69.) As the DPD reasons, "[s]chool districts were not required under prior law to provide computers and adequate technology necessary to administer standardized assessments under the STAR program." (*Id.*, p. 70.) However, although the DPD cites to both statutes and regulations for this conclusion, it then limits – without clear explanation – the source of the mandated activities only to the language of section 853, subdivision (b), of title 5 of the California Code of Regulations ("5 CCR 853(b)"), which states that "[t]he primary mode of administration of a CAASPP test shall be via a computing device, the use of an assessment technology platform, and the adaptive engine." To compound the problem, the DPD then asserts – this time, without any explanation – that "this requirement is a one-time requirement." (*Ibid.*)

The DPD also incorrectly found that the ongoing requirement is *solely* in section 857, subdivision (d), of title 5 of the California Code of Regulations ("5 CCR 857(d)"), which requires each district's or COE's CAASPP coordinator to "ensure current and ongoing compliance with the minimum technology specifications as identified by the CAASPP contractors." In reaching its conclusion, the DPD ignores the rule that "no regulation adopted is

valid or effective unless consistent and not in conflict with the statute and reasonably necessary to effectuate the purpose of the statute." (Gov. Code, § 11342.2; see also *California Teachers Ass'n v. California Comm'n on Teacher Credentialing*, (2003) 111 Cal.App.4th 1001, 1010-11) Thus, the DPD errs in two main ways. The first failure is the assertion that the requirement of a computer-based assessment lies exclusively in 5 CCR 853(b). The second is the claim that the ongoing duty to administer the computer-based assessment lies exclusively in 5 CCR 857(d).

A. The requirement to administer a computer-based assessment is not exclusively located in 5 CCR 853(b).

Education Code section 60640, subdivision (b),[3] in language added by the test claim statutes, requires the CAASPP to include "[a] consortium summative assessment in English language arts and mathematics for grades 3 to 8, inclusive, and grade 11 that measures content standards adopted by the state board." This assessment is required to be a computer-based test:

- The test claim statutes added subdivision (b)(5)(D) of Section 60640, which requires the State Superintendent to "report and make recommendations to the state board . . . no sooner than one year after the first full administration of the consortium *computer-adaptive assessments* in English language arts and mathematics summative assessments in grades 3 to 8, inclusive, and grade 11."

- The test claim statutes added subdivision (e) of Section 60640, which requires that the State Superintendent to "make available a paper and pencil version of [the SBAC] for use by pupils who are unable to access the *computer-based version* of the assessment for a maximum of three years after a new operational test is first administered."

- The test claim statutes added new language to subdivision (f)(1) of Section 60640, which states that "[t]he testing period established by the state board shall take into consideration the need of local educational agencies to provide makeup days for pupils who were absent during testing, as well as the need to schedule testing on *electronic computing devices*."

- The test claim statutes added Section 60603, which defines a *computer-based assessment* or *test* and a *computer-adaptive assessment* or *test*.

- Finally, the test claim statutes added new language to Section 60611, which states that "[n]othing in this section prohibits the use of materials to familiarize pupils

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[3] All subsequent references to "Section" or "Sections" shall be to the Education Code unless otherwise indicated.

> with item types or the *computer-based testing* environment used in the California Assessment of Student Performance and Progress."

In other words, while subdivision (b)(1) of Section 60640 did not use the word "computer," the phrase "[a] consortium summative assessment in English language arts and mathematics for grades 3 to 8, inclusive, and grade 11 that measures content standards adopted by the state board" clearly requires a computer-based test.

The requirement to administer this computer-based assessment is first found in Section 60640, subdivision (f)(1), which requires each district and COE to "administer assessments to each of its pupils *pursuant to subdivision (b)*." When the test claim statutes amended this subdivision, they deleted the phrase "in grades 2 to 11, inclusive, the standards-based achievement test" (i.e., the STAR) and replaced it with the reference to the newly added subdivision (b). Thus, a proper reading of the changes to subdivision (f) by the test claim statutes is that they impose a new requirement for each district and COE to "administer [a consortium summative assessment in English language arts and mathematics for grades 3 to 8, inclusive, and grade 11 that measures content standards adopted by the state board] to each of its pupils." Thus, contrary to the DPD, "the requirement to administer a statewide [computer-based] assessment pursuant to section 60640[, subdivision] (f) . . . *is* . . . different [than] under prior law." (DPD, p. 12 [emphasis added].)

Additionally, notwithstanding the DPD's conclusion to the contrary, the requirement to administer the computer-based assessment created in Section 60640, subdivision (b)(1) is also found in Section 60641, subdivision (a)(1), which specifies the time period in which the SBAC must be administered. Specifically, it requires districts and COEs to administer "the achievements tests provided for in Section 60640 . . . during the period prescribed in subdivision (b) of Section 60640." The DPD found that this sentence "is not mandatory or directory; rather, it refers to the time in which an activity will be conducted. . . . In any event, [districts and COEs] were required to administer the STAR tests under prior law . . . and therefore . . . it is not new." (DPD, p. 52.) Thus, despite recognizing that "a new and different test is required to be administered" under Section 60641, the DPD nonetheless concludes that "the activities and tasks associated with administering" a computer-based assessment "are no different" than administering the CSTs, a paper and pencil-based assessment. (*Id.*, p. 52) This reading of Section 60641 is incorrect.[4]

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[4] "The Smarter Balanced Summative Assessments which are delivered by computer consist of two sections: a computer-adaptive test and a Performance Task based on the Common Core State Standards for English language arts/literacy and mathematics. The computer-adaptive section includes a range of items types such as selected response, constructed response, table, fill-in, graphing, etc. The PT are extended activities that measure a student's ability to integrate knowledge and skills across multiple standards—a key component of college and career readiness." (See http://www.cde.ca.gov//ta/tg/ai/cefcaaspp.asp.)

Section 60641, subdivision (a) contains a list of "requirements" imposed on districts and COEs. Thus, read properly, subdivision (a)(1) imposes a requirement on districts and COEs to administer "the achievements tests provided for in Section 60640 . . . during the period prescribed in subdivision (b) of Section 60640." Moreover, the prior version of this subdivision referenced the "tests provided for in Section *60642.5*" (i.e., the STAR). The test claim statutes struck the reference to Section 60642.5 and replaced it with a reference to Section 60640. Thus, this new language clearly imposes a new requirement – *to administer* the SBAC (and not the CSTs in English and Mathematics) during the prescribed time period.

The DPD is also incorrect to assert that the "activities and tasks" required to administer a computer-based test "are no different" than those required to administer a paper and pencil-based assessment. The former requires expensive hardware and software as well as a connection to the internet along with significant training for teachers and students; the latter simply requires a #2 pencil, a test booklet, and an answer sheet to bubble in answers.

In sum, the test claim statutes, and not just 5 CCR 853(b), establish a new requirement: to administer a computer-based assessment. Indeed, the digest of AB 484, one of the test claim statutes, clearly states that the bill would replace "the California Standards Test and the augmented California Standards Tests in English language arts and mathematics with the . . . consortium computer-adaptive assessments in English language arts and mathematics."

B. The requirement to administer a computer-based assessment on an ongoing basis is not exclusively located in 5 CCR 857(d).

The sole justification for its erroneous conclusion that the ongoing duty to administer a computer-based assessment stems exclusively from 5 CCR 857(d) appears to be the use of the word "ongoing." In fact, if the DPD's conclusion is true, then there would be no ongoing duty to administer the SBAC without 5 CCR 857(d). As is demonstrated below, however, the opposite is true: while 5 CCR 857(d) certainly is *one* source of the ongoing requirement, it is not the only source.

Much of the same language that requires districts and COEs to administer a computer-based assessment also requires that it be administered annually – i.e., on an ongoing basis. For instance, as added by the test claim statutes, Section 60640, subdivision (b) begins with the phrase "*[c]ommencing* with the 2013-14 school year" before continuing on to state that "the CAASPP shall be composed of . . . [¶] A consortium summative assessment in English language arts and mathematics for grades 3 to 8, inclusive, and grade 11 that measures content standards adopted by the state board." The word "commence" means to "begin" or "start."[5] Thus, read properly, the phrase "[c]ommencing with the 2013-14 school year" indicates the Legislature's

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[5] See http://dictionary.reference.com/browse/commence, which defines "commence" as a verb to mean "to begin; start."

intent for the SBAC to be administered many times, with the first administration in 2013-14. "In interpreting a statute to determine legislative intent, a court looks first to the words of the statute and gives them their usual and ordinary meaning." (*Home Depot, U.S.A., Inc. v. Contractors' State License Bd.* (1996) 41 Cal. App. 4th 1592, 1600.) Moreover, the Legislature did not write subdivision (b) to say, for example, "*for* the 2013-14 school year" – which would have implied a one-time occurrence, nor is there any evidence CDE's interpretation of the test claim statutes would be so limited.

As detailed previously, Section 60640, subdivision (f) requires districts and COEs, to "administer assessments to each of its pupils *pursuant to subdivision (b)*." Thus, subdivision (f) is properly read to require districts and COEs, to "administer assessments [commencing with the 2013-14 school year] to each of its pupils." Additionally, Section 60641, subdivision (a)(1), which the test claim statutes amended to impose a requirement on districts and COEs to administer "the achievements tests *provided for in Section 60640*, must be read similarly.

Finally, there is language in at least three other statutes that directly support the conclusion that the test claim statutes themselves impose an ongoing requirement to administer the SBAC.

- The test claim statutes added subdivision (e) to Section 60640, which requires the State Superintendent to "make available a paper and pencil version of [the SBAC] for use by pupils who are unable to access the computer-based version of the assessment *for a maximum of three years after a new operational test is first administered*."

- The test claim statutes added Section 60648.5, including subdivision (a), which states that "[t]he *first* full administration of [the SBAC] shall occur in the 2014-15 school year."

- The test claim statutes added Section 60649, including subdivision (a), which directs the California Department of Education ("CDE") to provide for ongoing evaluation of the SBAC in order to "support[] the *continuous* improvement of the" SBAC, and subdivision (b), which requires CDE, starting with "the school year in which the *first* full administration of the [SBAC] occurs, and *every three years thereafter*," to "contract for a . . . independent evaluation of the [SBAC]," which "shall include interim annual reports."

In summary, the aforementioned statutory language, added by the test claim statutes, makes it clear that they too impose an ongoing duty to administer a computer-based assessment as part of the CAASPP. Again, this is exactly what the digest of AB 484 states: "This bill would, *commencing with the 2014-15 school year* . . . , authorize the replacement of the California Standards Test and the augmented California Standards Tests in English language arts and

mathematics with the . . . consortium computer-adaptive assessments in English language arts and mathematics."

3. Claimants did not need to include the alleged emergency regulations as amended by Register 2014, No. 6.

The DPD states that "Code of Regulations, title 5, section 850-864 . . . were most recently amended prior to the test claim regulations by Register 2014, No. 6, which was transmitted to the Office of Administrative Law (OAL) as an emergency regulation action, with an effective date of February 3, 2014, set to expire on August 5, 2014. Before the expiration of those February regulations, SBE re-filed sections 850-864 as an emergency regulation action, effective July 23, 2014, and set to expire on October 22, 2014. Those July regulations were designated Register 2014, No. 30. A certificate of compliance, along with additional amendments to the July emergency regulations was filed with OAL on July 16, 2014, and designed Register 2014, No. 35." (DPD, p. 58 [footnotes and emphasis omitted.].)

The DPD focused on the fact that the emergency regulations found in Register 2014, No. 30 ("No. 30 regulations") were the same as those found in Register 2014, No. 6 ("No. 6 regulations). Thus, the DPD concluded that the only potential new requirements from the test claim regulations were the amendments found in the permanent regulations in Register 2014, No. 35 ("No. 35 regulations") because none of the requirements found in No. 30 regulations were new. This conclusion is wrong.

The certificate of compliance references the No. 30 regulations. Thus, the No. 6 temporary regulations were never effective because they were repealed by operation of law.[6] In fact, CDE's CAASPP webpage states that "California Code of Regulations that regulate the CAASPP System, including, but not limited to, definitions, testing windows, administration requirements, and data elements . . . were adopted by the State Board of Education, July 9, 2014, and became effective August 28, 2014."[7]

Government Code section 11346.1, subdivision (h), allows for the "readoption" of emergency regulations for 90 days as long as the State Board of Education "made substantial progress and proceeded with diligence to comply with" the requirements of Government Code sections 11346.2-11347.3, which the State Board of Education failed to do. Thus, the only effective emergency regulations were the No. 30 emergency regulations.

If the Commission does find that the No. 6 regulations were effective, then it should conclude they were only applied to the *field test*. It was the Nos. 30 and 35 regulations that were permanent and that applied to the full SBAC.

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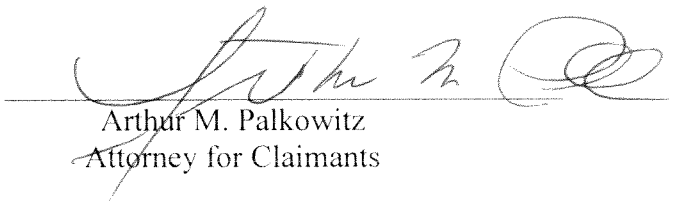
[6] See http://www.oal.ca.gov/Recent_Actions_Taken_on_Emergency_Regulations.htm.
[7] See http://www.cde.ca.gov/ta/tg/ca/.

Conclusion

Claimants have produced compelling evidence that the State did not appropriate adequate revenues to fund the cost of the mandated activities. Claimants have further demonstrated that the test claim statutes and regulations impose (i) a mandate to administer the SBAC (ii) on an ongoing basis. Finally, Claimants have shown that the DPD improperly excluded all the substantive requirements found in section 850-864 of title 5 of the California Code of Regulations.

I declare 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.



Arthur M. Palkowitz
Attorney for Claimants

Appendix for CAASPP (TC-14-01)

This Appendix contains three parts: Part A summarizes the technology-related cost information for each of the 77 districts or COEs that submitted letters to the Commission that follow this Appendix; Part B explains how Claimants' estimate that the annual technology-related SBAC cost per test-taker is $183; and Part C describes how Claimants' estimate that the State is providing no more than $44 per SBAC test-taker.

A. Summary of the technology-related SBAC cost information for each of the 77 districts and COEs that submitted letters to the Commission that follow this Appendix.

District/COE	2013-14 Enrollment in Grades 3-8 and Grade 11	2 Year (act. 2013-14 + est. 2014-15) Technology-Related SBAC Costs			Est. Annual Tech-Related SBAC Cost/ Test-Taker
		Non-Staffing Cost	Staffing Cost	Avg. Annual Total Cost	
1) Acton-Agua Dulce Unified SD	1,185	$355,000	$90,000	$222,500	$188
2) Anaheim City SD	10,746	$7,593,489	$552,668	$4,073,078	$379
3) Anaheim Union High SD	15,759	$2,615,176	$981,268	$1,798,222	$114
4) Antioch Unified SD	9,824	$6,396,113	$60,000	$3,228,057	$329
5) Baldwin Park Unified SD	8,899	$9,367	$8,140	$8,754	$1
6) Bassett Unified SD	2,220	$1,605,160	$684,412	$1,144,786	$516
7) Bellflower Unified SD	7,095	$842,036	$144,818	$493,427	$70
8) Belmont-Redwood Shores Elementary SD	2,376	$311,467	$0	$155,733	$66
9) Bonita Unified SD	5,177	$2,114,912	$408,531	$1,261,722	$244
10) Buena Park Elementary SD	3,397	$333,600	$11,102	$172,351	$51
11) Burbank Unified SD	8,431	$1,983,175	$71,230	$1,027,203	$122
12) Butte County Office of Education	559	$43,806	$35,903	$39,855	$71
13) Capistrano Unified SD	29,476	$5,442,468	$16,428	$2,729,448	$93
14) Castaic Union SD	1,831	$295,197	$31,985	$163,591	$89
15) Central Union High SD	920	$98,345	$0	$49,173	$53
16) Centralia Elementary SD	2,589	$2,050,000	$500,000	$1,275,000	$492
17) Clovis Unified SD	21,743	$14,652,127	$2,388,111	$8,520,119	$392

District/COE	2013-14 Enrollment in Grades 3-8 and Grade 11	2 Year (act. 2013-14 + est. 2014-15) Technology-Related SBAC Costs			Est. Annual Tech-Related SBAC Cost/ Test-Taker
		Non-Staffing Cost	Staffing Cost	Avg. Annual Total Cost	
18) Culver City Unified SD	3,551	$302,172	$0	$151,086	$43
19) Durham Unified SD	521	$74,310	$6,000	$40,155	$77
20) El Centro Elementary SD	3,983	$497,780	$0	$248,890	$62
21) Elk Grove Unified SD	33,658	$6,560,335	$1,500,000	$4,030,168	$120
22) Fountain Valley Elementary SD	4,425	$597,700	$7,128	$302,414	$68
23) Fresno County Office of Education	918	$268,127	$120,606	$194,367	$212
24) Fresno Unified SD	38,060	$8,235,000	$1,047,000	$4,641,000	$122
25) Fullerton Joint Union High SD	3,581	$1,084,398	$1,422,474	$1,253,436	$350
26) Garden Grove Unified SD	25,621	$3,299,907	$23,832	$1,661,869	$65
27) Glendale Unified SD	13,666	$1,846,693	$13,975	$930,334	$68
28) Glendora Unified SD	4,126	$330,754	$120,000	$225,377	$55
29) Golden Feather Union Elementary SD	88	$14,000	$4,500	$9,250	$105
30) Grossmont Union High SD	5,485	$1,983,573	$177,600	$1,080,587	$197
31) Hacienda La Puente Unified SD	10,672	$2,978,116	$869,726	$1,923,921	$180
32) Hawthorne SD	5,539	$1,121,458	$151,620	$636,539	$115
33) Heber Elementary SD	808	$196,000	$2,398	$99,199	$123
34) Holtville Unified SD	833	$358,155	$75,111	$216,633	$260
35) Huntington Beach Union High SD	4,102	$2,056,388	$168,395	$1,112,392	$271
36) Imperial County Office of Education	199	$114,900	$10,000	$62,450	$314
37) Keppel Union Elementary SD	1,821	$517,336	$55,760	$286,548	$157
38) Lennox SD	4,293	$2,852,000	$100,000	$1,476,000	$344
39) Lindsay Unified SD	2,224	$2,088,341	$0	$1,044,171	$470
40) Live Oak Unified SD	920	$281,876	$3,441	$142,659	$155
41) Los Alamitos Unified SD	5,192	$6,036,838	$47,304	$3,042,071	$586
42) Los Angeles Unified SD	339,488	$49,939,300	$3,000,000	$26,469,650	$78
43) McCabe Union Elementary SD	900	$175,912	$0	$87,956	$98

District/COE	2013-14 Enrollment in Grades 3-8 and Grade 11	2 Year (act. 2013-14 + est. 2014-15) Technology-Related SBAC Costs			Est. Annual Tech-Related SBAC Cost/ Test-Taker
		Non-Staffing Cost	Staffing Cost	Avg. Annual Total Cost	
44) Meadows Union Elementary SD	325	$64,994	$0	$32,497	$100
45) Merced County Office of Education	566	$36,242	$31,000	$33,621	$59
46) Monrovia Unified SD	3,135	$830,976	$81,011	$455,993	$145
47) Moreno Valley Unified SD	18,627	$3,225,857	$50,756	$1,638,306	$88
48) Mountain View Elementary SD	4,822	$274,200	$247,869	$261,035	$54
49) Mulberry Elementary SD	57	$2,557	$0	$1,279	$22
50) Newark Unified SD	3,352	$999,402	$9,000	$504,201	$150
51) Newhall SD	3,950	$3,416,742	$572,422	$1,994,582	$505
52) Newport-Mesa Unified SD	11,648	$897,892	$9,000	$453,446	$39
53) Oakland Unified SD	25,187	$9,900,000	$435,040	$5,167,520	$205
54) Orange Unified SD	15,780	$8,552,354	$26,100	$4,289,227	$272
55) Oroville City Elementary SD	1,661	$25,761	$0	$12,881	$8
56) Oroville Union High SD	575	$316,092	$0	$158,046	$275
57) Palmdale Elementary SD	13,726	$4,421,446	$153,426	$2,287,436	$167
58) Palos Verdes Peninsula Unified SD	6,276	$1,392,803	$44,000	$718,402	$114
59) Placentia-Yorba Linda Unified SD	13,729	$2,633,246	$206,411	$1,419,829	$103
60) Rosemead Elementary SD	1,922	$29,205	$0	$14,603	$8
61) Sacramento City Unified SD	25,037	$18,070,409	$241,539	$9,155,974	$366
62) San Benito County Office of Education	54	$30,522	$0	$15,261	$283
63) San Francisco Unified SD	30,203	$5,567,570	$1,707,781	$3,637,676	$120
64) San Gabriel Unified SD	3,139	$422,316	$353,299	$387,808	$124
65) Santa Monica-Malibu Unified SD	5,971	$9,538,967	$194,122	$4,866,545	$815
66) Santa Rosa City Schools	7,996	$453,663	$59,050	$256,356	$32
67) Saugus Union SD	5,940	$1,482,431	$157,400	$819,916	$138
68) Savanna Elementary SD	1,347	$312,699	$96,623	$204,661	$152
69) Seeley Union Elementary SD	210	$22,926	$100,611	$61,769	$294

District/COE	2013-14 Enrollment in Grades 3-8 and Grade 11	2 Year (act. 2013-14 + est. 2014-15) Technology-Related SBAC Costs			Est. Annual Tech-Related SBAC Cost/ Test-Taker
		Non-Staffing Cost	Staffing Cost	Avg. Annual Total Cost	
70) South Whittier Elementary SD	2,189	$159,682	$15,000	$87,341	$40
71) Tulelake Basin Joint Unified SD	248	$110,061	$735	$55,398	$223
72) Tustin Unified SD	13,101	$8,671,564	$259,000	$4,465,282	$341
73) Valle Lindo Elementary SD	793	$283,606	$15,711	$149,659	$189
74) West Covina Unified SD	7,915	$1,697,000	$65,000	$881,000	$111
75) Westside Elementary SD	6,048	$2,094,771	$6,574	$1,050,673	$174
76) Whittier Union High SD	3,303	$2,710,182	$800	$1,355,491	$410
77) Yuba City Unified SD	7,246	$501,100	$39,946	$270,523	$37
				TOTAL SAMPLE AVERAGE:	$183
Column:	*(A)*	*(B)*	*(C)*	*(D)*	*(E)*
Source/Calculation:	*www.ed-data.org*	*District/COE*	*District/COE*	*[(B) + (C)]/2*	*(D)/(A)*

B. Explanation of how Claimants' estimate that the annual technology-related SBAC cost per test-taker is $183.

The first step in explaining how Claimants' estimate that the annual technology-related SBAC cost per test-taker is $183 is to understand each column in the above chart.

- *Column (A)*: This column includes the total enrollment for grades 3-8 and grade 11 for 2013-14 for each district or COE. The source of this data is www.ed-data.org, which gets its data from the California Department of Education.

- *Column (B)*: This column is the total technology-related SBAC non-staffing costs for 2013-14 and 2014-15. This includes costs for devices (e.g., SBAC-compliant tablets, laptops, carts, PCs, IPads, MacBooks, Chromebooks, etc.) for administrators, teachers, staff, and students; other hardware (e.g., computer and tablet peripherals such as ear buds, mice keyboards, etc.) for administrators, teachers, staff, and students; software (e.g., operating systems, testing software, scheduling software, etc.); bandwidth infrastructure and equipment (e.g., hardware and software to meet district connectivity and Internet speed requirements); and other miscellaneous items necessary to administer the SBAC (e.g., asset tags, packing supplies, testing furniture, etc.). The costs for both years are based on data available at the time of submission. The source of this data is self-

reported by the district or COE and can be found in the letters submitted to the Commission from 77 districts and COEs that follow this Appendix.

- *Column (C)*: This column is the total technology-related SBAC staffing costs for 2013-14 and 2014-15. This includes costs for staff training (e.g., training administrators, teachers, and staff to use the devices, hardware, and software and/or to help students use the devices, hardware, and software); and new staff (e.g., hiring additional employees or consultants to set up the devices, hardware, and software). The costs for both years are based on data available at the time of submission. The source of this data is self-reported by the district or COE and can be found in the letters submitted to the Commission from 77 districts and COEs that follow this Appendix.

- *Column (D)*: This column is the annual average (mean) of each district or COE's total technology-related SBAC costs (i.e., the non-staffing costs and the staffing costs). The calculation is the sum of columns (B) and (C) divided by 2.

- *Column (E)*: This column is the estimated average (mean) annual technology-related SBAC cost per test-taker for each district or COE. The calculation is column (D) divided by column (A).

The Total Sample Average is calculated by taking the average (mean) of all the average of the numbers in column (E). This results in a reasonable estimate of the average statewide technology-related SBAC cost per test-taker. First, there is no easily accessible data source that provides for the exact number of SBAC test-takers. However, as Education Code section 60640 provides that the SBAC shall be administered to students in grades 3-8 and grade 11, a reasonable approximation of the number of SBAC test-takers is the number of students in grades 3-8 and in grade 11.[1] It should be noted that this is an overestimate of the number of actual test-takers given that (i) the 2013-14 SBAC was only a field test and (ii) not all students enrolled in grades 3-8 and grade 11 actually took the test even in 2014-15.

Second, the self-reported technology-related SBAC costs from each district and COE is likely underestimated: (i) districts and COEs did not have sufficient time to properly catalogue all relevant SBAC expenses; (ii) districts and COEs will need to upgrade their devices, equipment, and software and then retrain staff on the upgraded devices, equipment, and software in order to continue to properly administer the SBAC in the future; and (iii) the costs from 2013-14 were from the field test year rather than a year in which the SBAC was fully administered – two years of full testing would likely be more expensive.

[1] Enrollment data is not available for 2014-15 so enrollment data from 2013-14 is used. Using average (mean) enrollment for 2012-13 and 2013-14, which are the last two years of available data, does not give a significantly different result.

The average statewide technology-related SBAC cost per test-taker is calculated by dividing the SBAC technology-related cost for a district or COE by the number of test-takers. Thus, since the numerator is an underestimate and the denominator is an overestimate, the Total Sample Average is an underestimate of the average statewide technology-related SBAC cost per test-taker.

C. Description of how Claimants' estimate that the State is providing no more than $44 per SBAC test-taker.

The DPD asserts that the State has allocated $145 million to districts and COEs to administer the CAASPP, including the SBAC. Just as enrollment in grades 3-8 and grade 11 can be used to estimate the number of SBAC test-takers in each district, it can also be used to estimate the number of SBAC test-takers throughout California. Using the same data source (www.ed-data.org), enrollment in California in grades 3-8 and grade 11 is 3,292,006. Dividing $145 million by 3,292,006 results in approximately $44, which is the estimated amount of funding per SBAC test provided to districts and COEs by an allocation of $145 million. As noted in the comment, $44 represents less than 25% of the costs to be incurred by school districts.[2] This number is actually an overestimate of the amount of funding per SBAC test provided to districts and COEs because it is intended to cover the entire cost of administering the CAASPP, not just the cost of administering the SBAC.

[2] This ratio would not be significantly different if ADA rather than enrollment was used to approximate the number of test-takers.

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Acton-Agua Dulce Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $355,000 in non-staffing costs (e.g., hardware and software) and $90,000 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: June 18, 2015

Print Name: Dr. Steve Budhraja

Chief Financial Officer

Title/Position: _____

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Anaheim City School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $7,593,489 in non-staffing costs (e.g., hardware and software) and $552,668 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: June 18, 2015

Print Name: Dr. Linda Wagner

Title/Position: Superintendent

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Anaheim Union High School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $2,615,176 in non-staffing costs (e.g., hardware and software) and $981,268 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: X Dianne Poore Date: 6/18/2015

Print Name: Dianne Poore

Title/Position: Assistant Superintendent - Business

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Antioch Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $6,396,113 in non-staffing costs (e.g., hardware and software) and $60,000 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 6-18-15

Print Name: Timothy R Forrester

Title/Position: Associate Superintendent of Business and Operations

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Baldwin Park Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $9,367 in non-staffing costs (e.g., hardware and software) and $8,140 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: June 18, 2015

Print Name: Shirley Chang

Title/Position: Chief Business Officer/Sr. Director of Fiscal Services

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Bassett Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $1,605,160 in non-staffing costs (e.g., hardware and software) and $684,412 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 6/18/15

Print Name: Jose Arturo Sanchez Macias

Title/Position: Chief Business Official

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Bellflower Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $842,036 in non-staffing costs (e.g., hardware and software) and $144,818 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 6-18-15

Print Name: Brian Jacobs

Title/Position: Superintendent

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Belmont-Redwood Shores Elementary School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $311,467 in non-staffing costs (e.g., hardware and software). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 6/30/2015

Print Name: Michael Milliken

Title/Position: Superintendent, Belmont-Redwood Shores

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Bonita Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $2,114,912 in non-staffing costs (e.g., hardware and software) and $408,531 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Ann Sparks Date: 6-18-15

Print Name: Ann Sparks

Title/Position: Asst Supt Business

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Buena Park Elementary School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $333,600 in non-staffing costs (e.g., hardware and software) and $11,102 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 7/10/15

Print Name: Ramon Miramontes

Title/Position: Assistant Superintendent Educational Services

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Burbank Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $1,983,175 in non-staffing costs (e.g., hardware and software) and $71,230 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Sharon Cuseo Date: 6.18.15

Print Name: Sharon Cuseo

Title/Position: Assistant Superintendent
Curriculum and Assessment

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Butte County Office of Education ("COE") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The COE supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "absent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the COE has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the COE estimates that its technology-related SBAC expenditures totaled $43,806 in non-staffing costs (e.g., hardware and software) and $35,903 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The COE collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the COE's technology-related SBAC expenditures.

The COE emphasizes that its expenditures totals are only estimates of the actual combined cost that the COE incurred for 2013-14 and 2014-15. Moreover, the COE submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the COE did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 6·18·15

Print Name: Tad Alexander

Title/Position: Asst. Supt. Admn.

CAPISTRANO UNIFIED SCHOOL DISTRICT

33122 VALLE ROAD, SAN JUAN CAPISTRANO CA 92675
TELEPHONE: (949) 234-9200/FAX: 248-9563 www.capousd.org

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JIM REARDON

SUPERINTENDENT
KIRSTEN M. VITAL

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Capistrano Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $5,442,468 in non-staffing costs (e.g., hardware and software) and $16,428 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Philippa Geiger Date: 6/18/15

Print Name: PHILIPPA GEIGER

Title/Position: EXECUTIVE DIRECTOR, FISCAL SERVICES

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Castaic Union School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $295,197 in non-staffing costs (e.g., hardware and software) and $31,985 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Makon Date: 6/18/15

Print Name: Janene Makon

Title/Position: Interim Superintendent

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Central Union High School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $98,345 in non-staffing costs (e.g., hardware and software). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 7/14/15

Print Name: ARNOLD PRECIADO

Title/Position: ASST. SUPT. BUSINESS SERVICES.

Centralia School District

6625 La Palma Avenue • Buena Park, CA • 90620-2899 • (714) 228-3100 • District FAX (714) 228-3111

www.cesd.us

June 19, 2015

Commission on State Mandates
960 Ninth St., Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01
California Assessment of Student Performance and Progress

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Centralia School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $2,050,000 in non-staffing costs (e.g., hardware and software) and $500,000 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

Board of Trustees: Henry Charoen • Steve Harris • Art Montez • Dennis Salts • Connor Traut
District Superintendent: Diane Scheerhorn, Ph.D.

Centralia School District

6625 La Palma Avenue • Buena Park, CA • 90620-2899 • (714) 228-3100 • District FAX (714) 228-3111

www.cesd.us

Comment on Test Claim 14-TC-01
California Assessment of Student Performance and Progress
Continued

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Mark A Schiel Date: 06/18/15

Print Name: Mark A. Schiel

Title/Position: Assistant Superintendent of Business Services

cwn/test claim

Board of Trustees: Henry Charoen • Steve Harris • Art Montez • Dennis Salts • Connor Traut
District Superintendent: Diane Scheerhorn, Ph.D.

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Associate Superintendent
Michael Johnston
Associate Superintendent

June 18, 2015

Commission on State Mandates
960 Ninth Street
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Clovis Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $14,652,127 in non-staffing costs (e.g., hardware and software) and $2,388,111 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

1450 Herndon Avenue · Clovis, CA 93611-0599
559-327-9000 · www.cusd.com

Signature: Janet Young Date: June 18, 2015

Print Name: Janet Young, Ed.D.

Title/Position: Superintendent, Clovis Unified School District

"Lifelong learning...
filling the future with options"

Culver City Unified School District

Administration Building 4034 Irving Place Culver City, CA 90232-2810
(310) 842-4220

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Culver City Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $302,172 in non-staffing costs (e.g., hardware and software). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 7/1/15

Print Name: Mike Reynolds

Title/Position: Assistant Superintendent

BOARD OF EDUCATION
Ms. Laura Chardiet Ms. Nancy Goldberg Dr. Steven M. Levin Ms. Katherine Paspalis Ms. Susanne Robins Mr. David LaRose, Superintendent

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Durham Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $74,310 in non-staffing costs (e.g., hardware and software) and $6,000 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Ron Sherrod Date: 6-19-15

Print Name: Ron Sherrod

Title/Position: CBO

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of El Centro Elementary School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $497,780 in non-staffing costs (e.g., hardware and software). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Carla Arguilez Date: 7/15/2015

Print Name: Carla Arguilez

Title/Position: Director of Fiscal Services

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Elk Grove Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, absent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $6,560,335 in non-staffing costs (e.g., hardware and software) and $1,500,000 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Rich Fagan Date: 6/18/15

Print Name: RICH FAGAN

Title/Position: ASSOCIATE SUPERINTENDENT OF FINANCE

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Fountain Valley Elementary School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $597,700 in non-staffing costs (e.g., hardware and software) and $7,128 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 6/18/15

Print Name: Christine Fullerton

Title/Position: Assistant Superintendent Business

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of the Fresno County Office of Education ("FCOE") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The FCOE supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the FCOE has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the FCOE estimates that its technology-related SBAC expenditures totaled $268,127 in non-staffing costs (e.g., hardware and software) and $120,606 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The FCOE collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the FCOE's technology-related SBAC expenditures.

The FCOE emphasizes that its expenditures totals are only estimates of the actual combined cost that the FCOE incurred for 2013-14 and 2014-15. Moreover, the FCOE submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the FFCOE did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 06/18/15

Print Name: Jim A. Yovino

Title/Position: Superintendent

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Fresno Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $8,235,000 in non-staffing costs (e.g., hardware and software) and $1,047,000 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 6-19-15

Print Name: Kurt Madden

Title/Position: Chief Technology Officere

FULLERTON JOINT UNION HIGH SCHOOL DISTRICT
1051 West Bastanchury Road • Fullerton, California 92833-2247
(714)870-2810
FAX (714)870-2835
www.fjuhsd.k12.ca.us
Business Services

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Fullerton Joint Union High School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $1,084,398 in non-staffing costs (e.g., hardware and software) and $1,422,474 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: *June 18, 2015*

Print Name: *David Bennett*

Title/Position: *Director of Business Services*

GARDEN GROVE UNIFIED SCHOOL DISTRICT

10331 STANFORD AVENUE
GARDEN GROVE, CALIFORNIA 92840-6353
(714) 663-6000 Fax: (714) 663-6100

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Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Garden Grove Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $3,299,907 in non-staffing costs (e.g., hardware and software) and $ $23,832 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: June 18, 2015

Print Name: Rick Nakano

Title/Position: Assistant Superintendent, Business Services

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Glendale Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $1,846,693 in non-staffing costs (e.g., hardware and software) and $13,975 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Robert McEntire Date: 6/18/15

Print Name: Robert McEntire

Chief Business & Financial Officer

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Glendora Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $330,754 in non-staffing costs (e.g., hardware and software) and $120,000 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: John Ziegenhohn Date: June 23, 2015

Print Name: John Ziegenhohn

Title/Position: Fiscal Director

Commission on State Mandates
960 Ninth St. Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Golden Feather Union Elementary School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $14,000 in non-staffing costs (e.g., hardware and software) and $4,500 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Gregory Blake Date: 7/14/15
Print Name: Gregory Blake
Title/Position: Superintendent

COMMITTED TO EXCELLENCE
SINCE 1920

• GOVERNING BOARD MEMBERS

JIM KELLY
PRISCILLA SCHREIBER
ROBERT SHIELD
JIM STIERINGER
DR. GARY C. WOODS

• SUPERINTENDENT

RALF SWENSON

June 18, 2015
Refer to: RS2015-61

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Grossmont Union High School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $1,983,573 in non-staffing costs (e.g., hardware and software) and $177,600 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

POST OFFICE BOX 1043 LA MESA, CALIFORNIA 91944-1043 www.guhsd.net
TELEPHONE (619) 644-8000 FAX (619) 465-1349

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 6/18/15

Print Name: Ralf Swenson

Title/Position: Superintendent

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Hacienda La Puente Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $2,978,116 in non-staffing costs (e.g., hardware and software) and $869,726 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 6/18/2015

Print Name: Sonia Eckley

Title/Position: Director of Fiscal Services

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Hawthorne School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $1,121,458 in non-staffing costs (e.g., hardware and software) and $151,620 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Helen E. Morgan Date: June 18, 2015

Print Name: Helen E. Morgan, Ed.D.

Title/Position: Superintendent

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Heber Elementary School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $196,000 in non-staffing costs (e.g., hardware and software) and $2,398 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 6/18/15

Print Name: CAROLINA VALENZUELA

Title/Position: Director of Fiscal Services

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Holtville Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $358,155 in non-staffing costs (e.g., hardware and software) and $75,111 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: John-Paul Wells Date: 6/18/15

Print Name: John-Paul Wells

Title/Position: Assistant Superintendent

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Huntington Beach Union High School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $2,056,388 in non-staffing costs (e.g., hardware and software) and $168,395 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 6/18/2015

Print Name: Owen Crosby

Title/Position: Assistant Superintendent, Educational Services

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Imperial County Office of Education ("COE") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The COE supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the COE has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the COE estimates that its technology-related SBAC expenditures totaled $114,900 in non-staffing costs (e.g., hardware and software) and $10,000 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The COE collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the COE's technology-related SBAC expenditures.

The COE emphasizes that its expenditures totals are only estimates of the actual combined cost that the COE incurred for 2013-14 and 2014-15. Moreover, the COE submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the COE did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 6/18/15

Print Name: Monalisa Vitela

Title/Position: Senior Director, ICOE Alternative Education

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Keppel Union Elementary School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $517,336 in non-staffing costs (e.g., hardware and software) and $55,760 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: June 19, 2015

Print Name, Position: Linette Hodson, Assistant Superintendent Business Services

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Lennox School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $2,852,000 in non-staffing costs (e.g., hardware and software) and $100,000 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 6/18/15

Print Name: Kevin Franklin

Title/Position: Senior Director of Fiscal Services

Board Members:
Vahnn Blue
Jean Miller
Perla Soria
Alex Flores
Robert Hurtado

Superintendent:
Thomas L. Rooney

LINDSAY UNIFIED
SCHOOL DISTRICT

"Empowering and Motivating for Today and Tomorrow"
A National Race to the Top District

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Lindsay Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $2,088,341 in non-staffing costs (e.g., hardware and software). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: July 7, 2015

Print Name: Grant Schimelpfening

Title/Position: Chief Business Official

371 E. Hermosa Lindsay, CA 93247 ◆ Phone (559) 562-5111 ◆ Fax (559) 562-4637 ◆ www.lindsay.k12.ca.us

Superintendent's Office
Mathew Gulbrandsen
2201 Pennington Road
Live Oak, CA 95953
(530) 695-5400
FAX (530) 695-5403

Live Oak
Unified School District

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Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

June 19, 2015

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Live Oak Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $281,876 in non-staffing costs (e.g., hardware and software) and $3,441 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Christopher Peters
Chief Financial Officer

STRIVING FOR EXCELLENCE:
Academics, Citizenship, & Accountability

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Los Alamitos Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $6,036,838 in non-staffing costs (e.g., hardware and software) and $47,304 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Patricia L. Meyer Date: 6/19/15

Print Name: Patricia L. Meyer

Title/Position: Deputy Superintendent

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Los Angeles Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $49,939,300 in non-staffing costs (e.g., hardware and software) and $3,000,000 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Cynthia Lim Date: 6-18-15

Print Name: CYNTHIA LIM

Title/Position: Executive Director, Data & Accountability
Los Angeles Unified School District

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of McCabe Union Elementary School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $175,912 in non-staffing costs (e.g., hardware and software). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 7/14/15

Print Name: ARLYN ATAGERO

Title/Position: ASST. SUPERINTENDENT

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Meadows Union Elementary School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $64,994 in non-staffing costs (e.g., hardware and software). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Sue Anderson Date: 7/16/15

Print Name: Sue Anderson

Title/Position: Business Manager

Merced County Office of Education

Steven E. Gomes, Ed.D., Superintendent

Equal Opportunity Employer

July 1, 2015

Commission on State Mandates
960 Ninth Street Suite 300
Sacramento, CA 95814

Dear Members of the Commission on State Mandates:

COMMENT ON TEST CLAIM 14-TC-01 (CALIFORNIA ASSESSMENT OF STUDENT PERFORMANCE AND PROGRESS)

This written comment is submitted on behalf of Merced County Office of Education ("COE") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The COE supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the COE has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the COE estimates that its technology-related SBAC expenditures totaled $36,242 in non-staffing costs (e.g., hardware and software) and $31,000 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The COE collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the COE's technology-related SBAC expenditures.

The COE emphasizes that its expenditures totals are only estimates of the actual combined cost that the COE incurred for 2013-14 and 2014-15. Moreover, the COE submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the COE did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

STEVEN E. GOMES, Ed.D.
Superintendent of Schools

632 West 13th Street • Merced, California 95341-5908 • (209) 381-6600 • www.mcoe.org

KATHERINE FUNDUKIAN THOROSSIAN
Superintendent

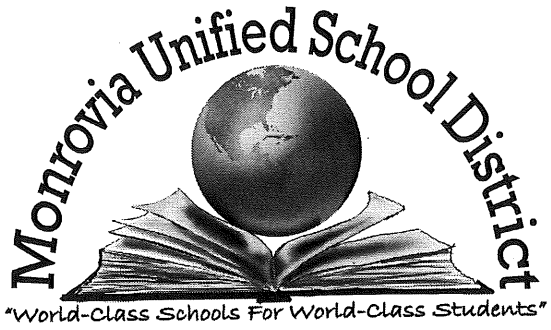
DARVIN JACKSON
Assistant Superintendent, Human Resources

SUE KAISER
Assistant Superintendent, Educational Services

CONNIE WU
Chief Business Officer

JASON BUCHANAN
Chief Technology Officer

KRISTIN K. MARICONDA
Administrative Assistant



325 East Huntington Drive, Monrovia, California 91016 * 626/471-2010 * FAX 626/471-2077

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Monrovia Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $830,705 in non-staffing costs (e.g., hardware and software) and $81,031 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included

examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: June 26, 2015

Print Name: Connie Wu

Position: Chief Business Officer

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Moreno Valley Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $3,225,857 in non-staffing costs (e.g., hardware and software) and $50,756 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 6-17-15

Print Name: Martinrex Kedziora, Ed.D.

Title/Position: Chief Academic Officer

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Mountain View Elementary School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $274,200 in non-staffing costs (e.g., hardware and software) and $247,869 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 06/18/15

Print Name: Lillian Maldonado French

Title/Position: Superintendent

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Mulberry Elementary School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $2,557 in non-staffing costs (e.g., hardware and software). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Chelsey Galindo Date: 7/16/15
Print Name: Chelsey Galindo
Title/Position: Superintendent/Principal

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Newark Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $999,402 in non-staffing costs (e.g., hardware and software) and $9,000 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: David J. Marken Date: 7/13/15
Print Name: DAVID J. MARKEN
Title/Position: Superintendent

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Newhall School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $3,416,742 in non-staffing costs (e.g., hardware and software) and $572,422 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Ronna Wolcott Date: 6/18/15

Print Name: Ronna Wolcott

Title/Position: Assistant Superintendent, Business Services

NEWPORT-MESA Unified School District

2985 Bear Street • Costa Mesa • California 92626 • (714) 424-5000

BOARD OF EDUCATION

Dana Black • Walt Davenport • Martha Fluor

Judy Franco • Charlene Metoyer • Vicki Snell • Karen Yelsey

Frederick Navarro, Ed.D., Superintendent

June 18, 2015

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Newport-Mesa Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its

technology-related SBAC expenditures totaled $897,892 in non-staffing costs (e.g., hardware and software) and $9,000 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 6-18-2015

Print Name: Paul Reed

Title/Position: Deputy Superintendent/CBO

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Oakland Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $9,900,000 in non-staffing costs (e.g., hardware and software) and $435,040 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Jean Y. Wing Date: 6/22/15

Print Name: Jean Y. Wing

Executive Director, Research, Assessment & Data

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Orange Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $8,552,354 in non-staffing costs (e.g., hardware and software) and $26,100 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: M Chris Jensen Date: 6-19-15

Print Name: Michael Christensen

Title/Position: Superintendent of Schools

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Oroville City Elementary School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $25,761 in non-staffing costs (e.g., hardware and software). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 7-1-2015

Print Name: Andrew James

Title/Position: Assistant Superintendent, Business

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Oroville Union High School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $316,092 in non-staffing costs (e.g., hardware and software). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Susan Watts Date: 7/10/15

Print Name: Susan Watts

Title/Position: Assistant Superintendent of Business

Palmdale School District
Launching a lifetime of learning

Teresa A. Santamaria
Business & Administrative Services
39139 10th Street East
Palmdale, CA 93550
661-947-7191 Ext. 7244
661-537-6152 Fax
www.palmdalesd.org

June 18, 2015

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Palmdale Elementary School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $4,421,446 in non-staffing costs (e.g., hardware and software) and $153,426 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Sincerely,

Teresa A. Santamaria
Chief Business Officer

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Palos Verdes Peninsula Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $1,392,803 in non-staffing costs (e.g., hardware and software) and $44,000 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: X _____ Date: 6/19/15

Print Name: Donald B. Austin, Ed.D.

Title/Position: Superintendent of Schools

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Placentia-Yorba Linda Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $2,633,246 in non-staffing costs (e.g., hardware and software) and $206,411 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

[name]
[title] Dir. of Assessment

6/17/15
Date

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Rosemead Elementary School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $29,205 in non-staffing costs (e.g., hardware and software). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: A. Gaeta Date: 7/1/15

Print Name: Alex Gaeta

Title/Position: Network Administrator

Sacramento City Unified School District

BUSINESS SERVICES
5735 47th Avenue● Sacramento, CA 95824
(916) 643-9055
Gerardo Castillo, CPA
Chief Business Officer

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Asami Saito
Student Board Member

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Sacramento City Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no reimbursable mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $18,070,409 in non-staffing costs (e.g., hardware and software) and $241,539 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Date:

Print Name: Gerardo Castillo, CPA
Title/Position: Chief Business Officer

6/19/15

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of San Benito County Office of Education ("COE") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The COE supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the COE has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the COE estimates that its technology-related SBAC expenditures totaled $30,522 in non-staffing costs (e.g., hardware and software) and $0 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The COE collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the COE's technology-related SBAC expenditures.

The COE emphasizes that its expenditures totals are only estimates of the actual combined cost that the COE incurred for 2013-14 and 2014-15. Moreover, the COE submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the COE did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Kim Dryden Date: 6/19/15

Print Name: Kim Dryden

Title/Position: Director, Special Projects

SFUSD SAN FRANCISCO PUBLIC SCHOOLS
San Francisco Unified School District • 555 Franklin Street • San Francisco, California 94102

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of San Francisco Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $5,567,570 in non-staffing costs (e.g., hardware and software) and $1,707,781 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to

the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Myong Leigh Date: June 22, 2015

Print Name: Myong Leigh (leighm@sfusd.edu / 415-241-6121)

Title/Position: Deputy Superintendent, Policy & Operations

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of San Gabriel Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $422,316 in non-staffing costs (e.g., hardware and software) and $353,299 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Wm Wong Date: June 19, 2015

Print Name: William Wong

Title/Position: Director of Fiscal Services

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Santa Monica-Malibu Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $9,538,967 in non-staffing costs (e.g., hardware and software) and $194,122 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 6/18/15

Print Name: Bertha T. Roman

Title/Position: Director of Education Technology

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Santa Rosa City Schools ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $453,663 in non-staffing costs (e.g., hardware and software) and $59,050 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 5-18-15

Print Name: Socorro Shiels

Title/Position: Superintendent

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Saugus Union School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $1,482,431 in non-staffing costs (e.g., hardware and software) and $157,400 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Joan M Lucid Date: 6-18-15

Print Name: Joan M. Lucid, Ed. D.

Title/Position: Superintendent

DR. SUE JOHNSON
SUPERINTENDENT

Savanna School District

1330 SOUTH KNOTT AVENUE
ANAHEIM, CALIFORNIA 92804-4798
PHONE: (714) 236-3800

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Savanna Elementary School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $312,699 in non-staffing costs (e.g., hardware and software) and $96,623 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: June 18, 2015

Print Name: Dr. Sue Johnson

Title/Position: Superintendent

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Seeley Union Elementary School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $22,926 in non-staffing costs (e.g., hardware and software) and $100,611 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Lola Larios Date: 6-19-15

Print Name: Lola Larios

Title/Position: Chief Business Official

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of South Whittier Elementary School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $159,682 in non-staffing costs (e.g., hardware and software) and $15,000 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 6-18-15

Print Name: Mark Kerikes

Title/Position: CBO

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Tulelake Basin Joint Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $110,061 in non-staffing costs (e.g., hardware and software) and $735 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Vanessa J Jones Date: 7/13/15

Print Name: VANESSA JONES

Title/Position: Superintendent

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Tustin Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $8,671,564 in non-staffing costs (e.g., hardware and software) and $259,000 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: June 18, 2015

Print Name: Anthony Soria

Title/Position: Chief Financial Officer

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Valle Lindo Elementary School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $283,606 in non-staffing costs (e.g., hardware and software) and $15,711 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: M. L. LaBrucherie Date: 6/18/15

Print Name: Dr. Mary Louise Labrucherie

Title/Position: Superintendent

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of West Covina Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $1,697,000 in non-staffing costs (e.g., hardware and software) and $65,000 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: Knowelle Decker Date: June 19, 2015

Print Name: KNOWELLE DECKER

Title/Position: COORDINATOR

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Westside Union School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $2,094,771 in non-staffing costs (e.g., hardware and software) and $6,574 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 6/18/2015

Print Name: Shawn Cabey

Title/Position: Assistant Superintendent, Administrative Services

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Whittier Union High School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $2,710,182 in non-staffing costs (e.g., hardware and software) and $800 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 6/30/15

Print Name: Carlye Olsen, Ed.D.

Title/Position: Director

Commission on State Mandates
960 Ninth St.
Suite 300
Sacramento, CA 95814

Re: Comment on Test Claim 14-TC-01 (California Assessment of Student Performance and Progress)

Dear Members of the Commission on State Mandates:

This written comment is submitted on behalf of Yuba City Unified School District ("District") regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes a reimbursable state mandate. The District supports the Test Claimants' position that Test Claim 14-TC-01 is a reimbursable state mandate.

On June 1, 2015, the Commission on State Mandates released its Draft Proposed Decision ("Draft Decision") on Test Claim 14-TC-01. Among other things, the Draft Decision declared that the technology components of the Smarter Balanced Assessment Consortium test ("SBAC") in English language arts/literacy and mathematics constituted a new state mandate. More specifically, the Draft Decision stated that the "requirement to provide 'a computing device, the use of an assessment technology platform, and the adaptive engine' in order to administer" the SBAC required school districts and county offices of education to provide "a higher level of services." (Draft Decision, p. 13.) However, the Draft Decision also stated that there was no *reimbursable* mandate because, "[a]bsent evidence to the contrary, the State has appropriated revenues sufficient" to cover the cost of the technology components of the SBAC. (Draft Decision, p. 17.) This letter is intended to provide such evidence to the contrary.

After becoming aware of the Draft Decision, the District has made its best effort to determine its technology-related SBAC costs in the short time period provided. For 2013-14 and 2014-15 together, the District estimates that its technology-related SBAC expenditures totaled $501,100 in non-staffing costs (e.g., hardware and software) and $39,946 in staffing costs (e.g., additional training and hiring necessary to implement the SBAC given its use of and reliance on technology). The District collected this information through a variety of means, which included examining expense reports and/or speaking with knowledgeable employees regarding the District's technology-related SBAC expenditures.

The District emphasizes that its expenditures totals are only estimates of the actual combined cost that the District incurred for 2013-14 and 2014-15. Moreover, the District submits that the actual cost incurred in those two years is likely to be higher due to a variety of factors, including that the District did not have time to comprehensively categorize all SBAC-related expenses.

I declare, by my signature below, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief. I also give permission to the Test Claimants to submit this letter as part of their written comments filed in response to the Draft Decision.

Signature: _____ Date: 7/2/15

Print Name: DEVIN SMITH

Title/Position: DIRECTOR OF INFORMATION TECHNOLOGY & SERVICES

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	113	85	97	99	147
Grade 1	119	105	74	104	179
Grade 2	120	111	100	74	182
Grade 3	115	116	110	96	162
Grade 4	130	110	109	109	191
Grade 5	130	141	104	106	177
Grade 6	147	134	130	99	164
Grade 7	163	156	124	128	112
Grade 8	163	153	149	106	130
Grade 9	146	136	118	145	106
Grade 10	154	143	129	124	183
Grade 11	157	150	124	158	249
Grade 12	138	156	138	194	401
Total	1,795	1,696	1,506	1,542	2,383

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	2,734	2,669	2,850	2,810	3,037
Grade 1	2,764	2,730	2,755	2,830	2,731
Grade 2	2,721	2,737	2,721	2,716	2,794
Grade 3	2,758	2,699	2,731	2,684	2,743
Grade 4	2,898	2,733	2,697	2,704	2,673
Grade 5	2,646	2,877	2,712	2,647	2,703
Grade 6	2,791	2,650	2,844	2,734	2,627
Grade 7	0	0	2	1	0
Total	19,312	19,095	19,312	19,126	19,308

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Grade 6	2	0	0	0	0
Grade 7	5,373	5,356	5,163	5,281	5,140
Grade 8	5,514	5,436	5,343	5,166	5,288
Grade 9	5,707	5,657	5,514	5,303	5,257
Grade 10	5,983	5,649	5,590	5,459	5,221
Grade 11	5,324	5,862	5,425	5,418	5,331
Grade 12	5,283	5,194	5,669	5,276	5,449
Ungraded	1	2	0	182	203
Total	33,187	33,156	32,704	32,085	31,889

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	1,427	1,372	1,473	1,417	1,482
Grade 1	1,442	1,402	1,344	1,490	1,388
Grade 2	1,393	1,417	1,398	1,356	1,404
Grade 3	1,417	1,419	1,410	1,423	1,343
Grade 4	1,425	1,416	1,383	1,396	1,404
Grade 5	1,351	1,445	1,417	1,431	1,403
Grade 6	1,442	1,371	1,434	1,405	1,367
Grade 7	1,470	1,494	1,384	1,398	1,444
Grade 8	1,498	1,484	1,488	1,404	1,398
Grade 9	1,479	1,536	1,503	1,454	1,308
Grade 10	1,537	1,509	1,508	1,499	1,424
Grade 11	1,587	1,548	1,467	1,509	1,465
Grade 12	1,539	1,668	1,663	1,670	1,693
Total	19,007	19,081	18,872	18,852	18,523

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	1,169	1,185	1,241	1,141	1,273
Grade 1	1,213	1,162	1,186	1,229	934
Grade 2	1,203	1,174	1,120	1,115	1,186
Grade 3	1,223	1,175	1,166	1,076	1,120
Grade 4	1,199	1,184	1,130	1,137	1,060
Grade 5	1,270	1,197	1,144	1,121	1,099
Grade 6	1,269	1,231	1,185	1,129	1,109
Grade 7	1,312	1,268	1,221	1,205	1,201
Grade 8	1,332	1,314	1,234	1,215	1,191
Grade 9	2,272	2,342	1,913	1,941	2,023
Grade 10	2,659	2,543	2,414	2,197	2,222
Grade 11	2,235	2,227	2,211	2,214	2,119
Grade 12	2,023	1,921	2,074	2,125	2,230
Ungraded	0	0	1	0	0
Total	20,379	19,923	19,240	18,845	18,767

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	348	336	379	333	420
Grade 1	381	330	324	365	262
Grade 2	377	344	314	318	361
Grade 3	377	361	326	310	309
Grade 4	404	352	356	315	308
Grade 5	376	391	341	345	304
Grade 6	390	352	350	320	342
Grade 7	394	377	336	345	317
Grade 8	400	363	343	328	346
Grade 9	327	320	291	285	257
Grade 10	336	324	316	290	280
Grade 11	374	326	307	330	294
Grade 12	349	350	322	310	338
Ungraded	6	0	0	0	0
Total	4,839	4,526	4,305	4,194	4,138

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	1,013	956	1,014	1,006	1,067
Grade 1	963	997	953	1,024	964
Grade 2	1,006	973	975	959	1,036
Grade 3	1,036	1,015	997	993	956
Grade 4	988	1,018	995	1,021	988
Grade 5	1,093	983	995	1,011	1,004
Grade 6	1,137	1,120	1,026	1,030	1,052
Grade 7	1,154	1,078	1,085	1,006	1,011
Grade 8	1,112	1,109	1,065	1,112	994
Grade 9	1,208	1,140	1,153	1,088	1,064
Grade 10	1,254	1,193	1,127	1,150	1,077
Grade 11	1,176	1,209	1,129	1,127	1,090
Grade 12	1,253	1,185	1,220	1,193	1,098
Ungraded	0	0	0	1	0
Total	14,393	13,976	13,734	13,721	13,401

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	423	431	419	446	475
Grade 1	413	444	419	444	428
Grade 2	370	394	448	436	447
Grade 3	351	355	397	453	419
Grade 4	425	329	361	400	452
Grade 5	247	348	333	361	413
Grade 6	313	331	371	354	366
Grade 7	363	289	339	373	348
Grade 8	210	285	293	340	378
Grade 9	276	0	0	0	0
Total	3,391	3,206	3,380	3,607	3,726

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	621	641	695	700	728
Grade 1	687	621	665	723	683
Grade 2	702	689	615	674	732
Grade 3	663	716	706	626	688
Grade 4	701	678	728	734	642
Grade 5	705	720	698	739	749
Grade 6	744	730	714	729	759
Grade 7	750	783	785	748	749
Grade 8	834	771	794	804	759
Grade 9	864	874	822	856	905
Grade 10	933	862	871	816	868
Grade 11	878	925	854	873	831
Grade 12	845	888	923	848	875
Total	9,927	9,898	9,870	9,870	9,968

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	543	602	619	624	629
Grade 1	613	596	631	630	591
Grade 2	579	589	586	595	609
Grade 3	636	568	583	564	585
Grade 4	637	609	597	585	547
Grade 5	632	603	585	590	568
Grade 6	595	642	627	576	565
Grade 7	576	537	598	589	546
Grade 8	583	550	519	596	586
Grade 9	1	0	0	0	0
Total	5,395	5,296	5,345	5,349	5,226

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	905	877	945	965	1,067
Grade 1	983	972	897	1,038	959
Grade 2	976	996	996	936	1,027
Grade 3	1,017	1,026	1,036	1,036	958
Grade 4	1,048	1,085	1,060	1,073	1,056
Grade 5	1,064	1,098	1,124	1,085	1,101
Grade 6	1,164	1,135	1,185	1,196	1,170
Grade 7	1,237	1,245	1,242	1,230	1,214
Grade 8	1,254	1,278	1,243	1,287	1,236
Grade 9	1,772	1,622	1,622	1,543	1,526
Grade 10	1,851	1,840	1,742	1,704	1,605
Grade 11	1,773	1,826	1,802	1,755	1,696
Grade 12	1,688	1,622	1,776	1,698	1,592
Ungraded	1	1	0	0	0
Total	16,733	16,623	16,670	16,546	16,207

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	127	143	76	55	59
Grade 1	100	107	67	58	57
Grade 2	106	103	60	61	60
Grade 3	79	116	61	61	59
Grade 4	81	94	65	60	67
Grade 5	78	94	58	58	58
Grade 6	84	93	59	53	61
Grade 7	73	88	60	70	78
Grade 8	90	91	66	69	85
Grade 9	69	86	88	77	89
Grade 10	108	104	138	119	104
Grade 11	124	124	125	156	151
Grade 12	150	153	132	138	175
Ungraded	26	27	30	25	26
Total	1,295	1,423	1,085	1,060	1,129

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	3,656	3,781	3,685	3,749	3,702
Grade 1	4,107	3,845	3,983	3,965	3,837
Grade 2	3,927	4,035	3,871	4,070	3,948
Grade 3	4,063	3,920	4,030	3,966	4,127
Grade 4	4,123	4,058	3,944	4,091	3,992
Grade 5	4,133	4,169	4,121	4,048	4,211
Grade 6	4,133	4,126	4,180	4,219	4,094
Grade 7	4,289	4,133	4,244	4,250	4,294
Grade 8	4,113	4,281	4,213	4,312	4,355
Grade 9	4,269	4,188	4,342	4,341	4,325
Grade 10	4,164	4,242	4,308	4,369	4,358
Grade 11	4,359	4,095	4,192	4,310	4,403
Grade 12	4,045	4,319	4,057	4,095	4,187
Total	53,381	53,192	53,170	53,785	53,833

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	322	279	306	275	272
Grade 1	332	311	286	317	241
Grade 2	314	312	316	299	307
Grade 3	332	312	324	313	287
Grade 4	367	321	305	325	294
Grade 5	381	347	320	305	307
Grade 6	384	380	351	317	298
Grade 7	380	363	377	339	322
Grade 8	397	357	354	374	323
Grade 9	2	0	0	0	0
Total	3,211	2,982	2,939	2,864	2,651

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	0	0	0	0	1
Grade 1	0	0	0	0	0
Grade 2	0	0	0	0	0
Grade 3	0	0	0	0	0
Grade 4	0	0	0	0	0
Grade 5	0	0	0	0	0
Grade 6	0	0	0	0	0
Grade 7	0	0	0	0	0
Grade 8	1	1	6	5	1
Grade 9	1,190	1,188	1,190	1,214	1,194
Grade 10	1,039	1,014	1,033	1,067	1,066
Grade 11	910	918	920	911	919
Grade 12	962	888	907	907	886
Total	4,102	4,009	4,056	4,104	4,067

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	579	603	624	641	668
Grade 1	619	606	611	627	596
Grade 2	669	616	601	640	627
Grade 3	663	692	614	628	648
Grade 4	685	651	672	625	612
Grade 5	699	664	661	673	651
Grade 6	652	708	657	667	678
Total	4,566	4,540	4,440	4,501	4,480

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	2,908	2,836	2,952	3,171	3,386
Grade 1	2,858	3,049	2,857	3,046	3,049
Grade 2	2,792	2,821	3,018	2,890	3,035
Grade 3	2,803	2,852	2,874	3,048	2,964
Grade 4	2,897	2,839	2,939	2,916	3,154
Grade 5	2,882	2,943	2,915	3,019	3,019
Grade 6	2,959	2,930	3,007	3,003	3,106
Grade 7	2,989	3,137	3,120	3,214	3,155
Grade 8	3,048	3,029	3,165	3,132	3,291
Grade 9	3,068	3,125	3,106	3,228	3,236
Grade 10	3,029	3,050	3,087	3,087	3,233
Grade 11	2,916	2,963	2,999	3,037	3,054
Grade 12	2,855	2,921	3,001	3,103	3,101
Total	38,004	38,495	39,040	39,894	40,783

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	517	478	496	533	567
Grade 1	479	530	491	490	470
Grade 2	436	479	537	489	487
Grade 3	429	447	491	536	489
Grade 4	454	443	460	488	547
Grade 5	451	468	453	465	493
Grade 6	528	514	485	473	475
Grade 7	517	542	509	495	494
Grade 8	531	519	540	505	503
Grade 9	627	570	595	522	534
Grade 10	639	618	559	586	531
Grade 11	596	615	590	543	550
Grade 12	597	598	610	616	551
Total	6,801	6,821	6,816	6,741	6,691

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	67	69	63	65	84
Grade 1	84	70	79	62	62
Grade 2	72	79	64	73	63
Grade 3	69	76	78	67	67
Grade 4	58	66	79	82	68
Grade 5	103	61	66	87	86
Grade 6	68	98	68	66	87
Grade 7	90	70	97	66	70
Grade 8	84	87	71	97	63
Grade 9	102	90	81	72	87
Grade 10	87	95	94	78	70
Grade 11	95	79	93	85	80
Grade 12	90	90	90	91	87
Total	1,069	1,030	1,023	991	974

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	595	685	686	699	699
Grade 1	663	687	735	714	686
Grade 2	634	674	673	729	726
Grade 3	605	676	691	652	728
Grade 4	625	641	670	680	658
Grade 5	608	636	658	651	685
Grade 6	618	593	639	657	655
Grade 7	595	627	609	609	642
Grade 8	641	609	624	605	615
Total	5,584	5,828	5,985	5,996	6,094

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	4,525	4,457	4,483	4,470	4,588
Grade 1	4,624	4,723	4,586	4,624	4,583
Grade 2	4,573	4,599	4,651	4,593	4,627
Grade 3	4,635	4,558	4,611	4,715	4,647
Grade 4	4,670	4,676	4,622	4,641	4,820
Grade 5	4,730	4,734	4,678	4,715	4,731
Grade 6	4,816	4,814	4,766	4,766	4,805
Grade 7	5,032	4,926	4,875	4,835	4,866
Grade 8	4,833	5,030	4,918	4,850	4,904
Grade 9	4,965	4,798	4,975	4,850	4,865
Grade 10	4,855	4,901	4,698	4,941	4,812
Grade 11	4,755	4,772	4,792	4,659	4,885
Grade 12	4,980	4,991	5,006	4,994	4,843
Ungraded	490	437	462	484	523
Total	62,483	62,416	62,123	62,137	62,499

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	636	594	587	680	661
Grade 1	614	681	626	572	663
Grade 2	678	627	703	632	588
Grade 3	631	681	665	719	658
Grade 4	696	635	696	690	716
Grade 5	686	736	668	709	707
Grade 6	712	769	762	692	769
Grade 7	781	787	811	828	749
Grade 8	813	802	799	822	826
Grade 9	38	0	0	0	0
Grade 10	30	0	0	0	0
Total	6,315	6,312	6,317	6,344	6,337

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	122	113	99	116	137
Grade 1	101	96	124	126	129
Grade 2	98	106	107	115	130
Grade 3	89	100	97	122	132
Grade 4	93	77	96	100	122
Grade 5	102	89	81	98	115
Grade 6	102	88	95	85	100
Grade 7	96	87	73	59	54
Grade 8	118	102	112	109	114
Grade 9	171	315	167	143	152
Grade 10	174	251	241	201	225
Grade 11	140	262	276	281	281
Grade 12	54	257	304	344	410
Ungraded	1	0	256	195	212
Total	1,461	1,943	2,128	2,094	2,313

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	6,229	6,177	6,430	6,588	6,964
Grade 1	6,161	6,323	6,261	6,455	6,079
Grade 2	5,936	6,018	6,171	6,058	6,241
Grade 3	5,858	5,732	5,893	5,988	5,920
Grade 4	5,607	5,743	5,608	5,713	5,826
Grade 5	5,761	5,478	5,612	5,457	5,584
Grade 6	5,605	5,737	5,438	5,463	5,342
Grade 7	5,533	5,465	5,465	5,172	5,280
Grade 8	5,578	5,377	5,316	5,300	5,060
Grade 9	6,368	6,033	5,545	5,441	5,449
Grade 10	6,093	6,032	5,477	5,322	5,299
Grade 11	5,588	5,539	5,403	5,220	5,048
Grade 12	5,150	5,174	5,616	5,512	5,261
Ungraded	1	3	0	0	0
Total	75,468	74,831	74,235	73,689	73,353

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Grade 8	50	0	0	1	1
Grade 9	4,446	4,581	4,513	4,253	4,167
Grade 10	2,987	2,850	2,930	2,903	2,904
Grade 11	4,200	3,963	4,092	4,223	3,580
Grade 12	3,446	3,332	3,247	3,228	3,722
Ungraded	1	0	0	0	127
Total	15,130	14,726	14,782	14,608	14,501

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	3,648	3,705	3,436	3,387	3,433
Grade 1	3,598	3,474	3,577	3,524	3,297
Grade 2	3,370	3,661	3,478	3,587	3,492
Grade 3	3,621	3,407	3,720	3,526	3,578
Grade 4	3,681	3,665	3,442	3,735	3,525
Grade 5	3,682	3,709	3,670	3,501	3,710
Grade 6	3,603	3,787	3,789	3,684	3,514
Grade 7	3,698	3,649	3,736	3,794	3,645
Grade 8	3,812	3,846	3,647	3,718	3,861
Grade 9	3,928	3,844	3,964	3,605	3,675
Grade 10	3,994	4,045	3,770	3,859	3,588
Grade 11	3,891	3,909	3,919	3,771	3,788
Grade 12	3,387	3,958	3,851	3,908	3,830
Ungraded	1	0	0	0	0
Total	47,914	48,659	47,999	47,599	46,936

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	1,694	1,781	1,783	1,953	1,997
Grade 1	1,708	1,803	1,909	1,865	1,939
Grade 2	1,762	1,715	1,840	1,942	1,893
Grade 3	1,698	1,797	1,763	1,872	1,969
Grade 4	1,849	1,721	1,824	1,792	1,928
Grade 5	1,844	1,901	1,760	1,855	1,819
Grade 6	2,012	1,926	1,993	1,807	1,904
Grade 7	2,164	2,069	1,951	1,973	1,836
Grade 8	2,146	2,184	2,118	1,984	2,000
Grade 9	2,368	2,243	2,219	2,148	2,047
Grade 10	2,354	2,390	2,267	2,240	2,176
Grade 11	2,373	2,319	2,349	2,251	2,210
Grade 12	2,602	2,522	2,436	2,407	2,282
Ungraded	0	0	16	98	70
Total	26,574	26,371	26,228	26,187	26,070

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	492	491	553	561	598
Grade 1	474	478	513	532	491
Grade 2	449	499	502	529	528
Grade 3	464	482	530	523	532
Grade 4	524	488	509	554	538
Grade 5	493	566	522	522	549
Grade 6	497	581	625	556	565
Grade 7	553	563	600	662	605
Grade 8	559	1,050	565	622	699
Grade 9	615	158	625	588	657
Grade 10	645	640	643	639	592
Grade 11	611	643	641	639	638
Grade 12	650	645	659	632	640
Total	7,026	7,284	7,487	7,559	7,632

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	22	16	15	10	10
Grade 1	17	11	16	14	13
Grade 2	12	19	13	14	14
Grade 3	18	11	15	16	13
Grade 4	12	17	11	13	15
Grade 5	13	13	18	11	12
Grade 6	10	6	9	20	10
Grade 7	9	11	9	6	20
Grade 8	16	12	16	9	10
Grade 9	0	0	5	9	7
Grade 10	0	0	5	17	19
Grade 11	0	0	1	11	8
Grade 12	0	0	1	6	8
Total	129	116	134	156	159

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	40	0	0	0	0
Grade 1	40	0	0	0	0
Grade 2	40	0	0	0	0
Grade 3	40	0	0	0	0
Grade 4	46	0	0	0	0
Grade 5	48	0	1	1	0
Grade 6	26	0	0	0	0
Grade 7	14	8	1	1	5
Grade 8	51	29	26	27	8
Grade 9	6,306	5,838	5,639	5,423	5,636
Grade 10	6,143	6,014	5,820	5,588	5,374
Grade 11	6,116	5,880	5,813	5,665	5,472
Grade 12	6,556	6,453	6,375	6,260	6,060
Ungraded	0	2	0	0	0
Total	25,466	24,224	23,675	22,965	22,555

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	1,485	1,467	1,475	1,486	1,571
Grade 1	1,486	1,513	1,536	1,492	1,410
Grade 2	1,502	1,490	1,493	1,502	1,466
Grade 3	1,490	1,471	1,478	1,477	1,474
Grade 4	1,648	1,492	1,450	1,445	1,463
Grade 5	1,520	1,627	1,519	1,439	1,437
Grade 6	1,709	1,525	1,658	1,495	1,460
Grade 7	1,771	1,748	1,593	1,648	1,515
Grade 8	1,724	1,789	1,771	1,602	1,663
Grade 9	1,695	1,685	1,701	1,678	1,522
Grade 10	1,813	1,712	1,696	1,701	1,672
Grade 11	1,693	1,763	1,689	1,659	1,660
Grade 12	1,754	1,660	1,790	1,734	1,719
Total	21,290	20,942	20,849	20,358	20,032

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	919	884	955	1,046	1,037
Grade 1	908	996	929	977	976
Grade 2	924	901	984	951	942
Grade 3	950	878	890	966	898
Grade 4	1,018	919	881	896	939
Grade 5	936	979	922	885	893
Grade 6	910	854	940	877	857
Grade 7	924	897	872	948	862
Grade 8	974	923	898	887	966
Grade 9	187	173	155	177	173
Grade 10	189	171	159	146	155
Grade 11	162	154	141	141	124
Grade 12	137	126	140	130	122
Ungraded	1	0	0	0	0
Total	9,139	8,855	8,866	9,027	8,944

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	116	120	105	123	139
Grade 1	140	133	150	125	132
Grade 2	131	135	115	156	127
Grade 3	134	130	139	120	148
Grade 4	130	140	122	140	118
Grade 5	103	131	131	123	139
Grade 6	114	115	125	128	124
Grade 7	121	129	119	130	144
Grade 8	112	124	133	125	135
Total	1,101	1,157	1,139	1,170	1,206

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	125	125	105	107	110
Grade 1	106	122	125	110	109
Grade 2	108	107	103	118	103
Grade 3	137	99	100	103	114
Grade 4	122	131	105	109	107
Grade 5	131	116	121	107	104
Grade 6	130	130	125	129	114
Grade 7	135	130	128	126	130
Grade 8	123	134	128	133	124
Grade 9	144	121	140	132	148
Grade 10	170	138	121	150	133
Grade 11	148	159	143	129	140
Grade 12	133	132	152	133	114
Total	1,712	1,644	1,596	1,586	1,550

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Grade 8	3	0	0	0	0
Grade 9	3,936	4,073	4,091	3,999	4,018
Grade 10	4,051	4,003	4,107	4,133	4,011
Grade 11	4,025	4,089	3,989	4,143	4,102
Grade 12	4,019	3,992	4,076	4,125	4,300
Ungraded	128	160	179	0	0
Total	16,162	16,317	16,442	16,400	16,431

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	16	25	25	32	20
Grade 1	26	21	27	26	31
Grade 2	15	25	20	27	18
Grade 3	22	12	23	19	26
Grade 4	22	21	14	21	19
Grade 5	15	21	20	13	23
Grade 6	13	13	21	22	12
Grade 7	19	18	17	22	24
Grade 8	59	41	28	30	38
Grade 9	146	101	64	63	60
Grade 10	104	109	111	72	75
Grade 11	115	63	82	80	57
Grade 12	67	134	51	54	68
Ungraded	16	15	56	59	53
Total	655	619	559	540	524

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	280	269	276	313	264
Grade 1	323	259	256	288	311
Grade 2	280	321	254	270	293
Grade 3	312	286	322	283	282
Grade 4	321	312	267	323	272
Grade 5	324	327	320	283	315
Grade 6	345	313	323	322	293
Grade 7	320	348	320	340	318
Grade 8	351	320	339	325	341
Total	2,856	2,755	2,677	2,747	2,689

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	588	552	618	635	613
Grade 1	664	628	574	617	620
Grade 2	603	588	587	569	614
Grade 3	615	574	566	569	558
Grade 4	581	617	569	550	569
Grade 5	623	581	607	567	551
Grade 6	836	801	791	767	718
Grade 7	852	826	794	784	831
Grade 8	881	832	816	795	783
Grade 9	328	332	318	316	318
Grade 10	304	315	303	306	312
Grade 11	249	283	306	290	283
Grade 12	243	227	258	278	273
Total	7,367	7,156	7,107	7,043	7,043

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	334	346	375	375	357
Grade 1	346	342	324	340	354
Grade 2	338	358	330	319	336
Grade 3	342	336	353	330	316
Grade 4	339	342	327	335	331
Grade 5	324	340	327	321	335
Grade 6	328	319	331	317	313
Grade 7	301	330	315	320	319
Grade 8	310	302	320	308	340
Grade 9	288	313	296	307	287
Grade 10	296	276	317	282	309
Grade 11	251	297	261	306	270
Grade 12	310	249	292	270	309
Total	4,107	4,150	4,168	4,130	4,176

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	143	138	149	134	158
Grade 1	147	133	143	135	119
Grade 2	154	140	137	140	134
Grade 3	133	139	129	127	138
Grade 4	133	124	136	125	129
Grade 5	147	124	125	139	132
Grade 6	143	146	121	123	144
Grade 7	133	136	151	117	129
Grade 8	163	126	140	141	119
Grade 9	162	159	119	141	152
Grade 10	145	146	158	121	130
Grade 11	148	146	142	152	129
Grade 12	132	124	139	145	144
Total	1,883	1,781	1,789	1,740	1,757

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	734	776	824	814	835
Grade 1	635	637	669	723	673
Grade 2	563	645	643	675	723
Grade 3	592	604	678	685	689
Grade 4	689	635	629	711	708
Grade 5	686	706	647	647	726
Grade 6	765	749	765	696	718
Grade 7	725	806	817	841	765
Grade 8	799	737	823	853	854
Grade 9	884	789	730	887	857
Grade 10	836	878	775	741	887
Grade 11	851	823	861	768	732
Grade 12	823	855	853	871	755
Total	9,582	9,640	9,714	9,912	9,922

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	57,292	52,954	57,344	54,946	56,953
Grade 1	52,231	53,298	63,662	53,556	52,276
Grade 2	51,199	52,017	52,185	51,924	52,641
Grade 3	51,699	50,995	50,286	50,548	51,066
Grade 4	51,880	51,458	50,223	49,998	49,937
Grade 5	51,024	51,557	38,734	49,332	49,885
Grade 6	48,840	49,315	47,694	48,244	47,306
Grade 7	49,691	49,021	48,309	48,324	47,706
Grade 8	48,751	49,733	48,363	47,607	47,876
Grade 9	66,794	64,579	62,312	59,660	57,350
Grade 10	56,461	54,257	54,049	51,681	51,668
Grade 11	47,899	46,804	46,933	44,686	45,712
Grade 12	37,184	41,117	42,045	44,988	43,450
Ungraded	143	146	1	0	0
Total	671,088	667,251	662,140	655,494	653,826

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	145	133	136	157	171
Grade 1	112	146	154	139	145
Grade 2	135	118	134	151	136
Grade 3	111	151	118	132	161
Grade 4	129	123	158	119	141
Grade 5	108	135	126	157	128
Grade 6	129	125	144	135	167
Grade 7	151	149	126	149	151
Grade 8	140	142	141	128	152
Total	1,160	1,222	1,237	1,267	1,352

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	49	49	44	48	48
Grade 1	50	52	49	44	49
Grade 2	57	52	49	55	46
Grade 3	54	54	54	48	61
Grade 4	59	54	56	55	44
Grade 5	65	62	58	54	56
Grade 6	40	65	61	52	46
Grade 7	54	47	63	61	52
Grade 8	50	55	44	58	66
Total	478	490	478	475	468

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	70	62	90	60	72
Grade 1	50	52	40	68	45
Grade 2	45	40	37	40	57
Grade 3	46	47	35	46	47
Grade 4	40	47	46	40	46
Grade 5	38	45	49	40	41
Grade 6	51	42	54	60	55
Grade 7	77	64	57	59	64
Grade 8	99	104	93	79	74
Grade 9	90	80	85	78	73
Grade 10	252	217	181	165	146
Grade 11	332	338	305	247	239
Grade 12	572	501	425	395	328
Ungraded	109	96	44	88	103
Total	1,871	1,735	1,541	1,465	1,390

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	439	416	467	466	491
Grade 1	445	439	426	441	452
Grade 2	449	450	452	439	424
Grade 3	434	454	449	440	443
Grade 4	436	436	454	449	425
Grade 5	430	443	448	445	437
Grade 6	456	426	456	451	441
Grade 7	460	442	421	454	446
Grade 8	447	463	453	447	464
Grade 9	476	467	482	477	461
Grade 10	506	476	464	482	497
Grade 11	505	513	468	467	479
Grade 12	523	530	530	478	528
Total	6,006	5,955	5,970	5,936	5,988

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	2,802	2,681	2,661	2,572	2,657
Grade 1	2,878	2,885	2,757	2,799	2,567
Grade 2	2,701	2,779	2,716	2,647	2,774
Grade 3	2,821	2,657	2,731	2,709	2,602
Grade 4	2,837	2,797	2,616	2,746	2,698
Grade 5	2,749	2,826	2,795	2,597	2,728
Grade 6	2,757	2,701	2,760	2,743	2,551
Grade 7	2,796	2,861	2,736	2,736	2,702
Grade 8	2,893	2,821	2,875	2,704	2,786
Grade 9	2,948	2,853	2,781	2,744	2,633
Grade 10	2,870	2,897	2,807	2,677	2,690
Grade 11	2,916	2,821	2,737	2,616	2,560
Grade 12	2,841	3,036	2,718	2,634	2,518
Ungraded	0	0	0	0	2
Total	36,809	36,615	35,690	34,924	34,468

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	924	944	964	993	926
Grade 1	1,012	915	911	886	917
Grade 2	905	942	885	877	849
Grade 3	951	853	918	856	845
Grade 4	946	906	839	864	826
Grade 5	871	891	877	804	845
Grade 6	904	847	835	810	773
Grade 7	917	835	783	763	769
Grade 8	917	888	816	764	764
Grade 9	6	0	0	1	0
Total	8,353	8,021	7,828	7,618	7,514

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	7	11	8	13	8
Grade 1	10	10	9	7	12
Grade 2	14	8	11	8	7
Grade 3	12	12	8	8	7
Grade 4	7	10	12	11	10
Grade 5	9	8	12	11	10
Grade 6	6	8	11	11	11
Grade 7	9	7	13	9	12
Grade 8	16	9	7	13	7
Total	90	83	91	91	84

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	512	486	535	494	470
Grade 1	549	503	490	535	507
Grade 2	534	544	497	481	491
Grade 3	507	501	537	478	469
Grade 4	512	485	486	526	472
Grade 5	494	488	486	469	507
Grade 6	550	460	488	487	448
Grade 7	514	557	435	474	462
Grade 8	494	504	535	432	479
Grade 9	552	487	528	546	436
Grade 10	556	538	481	520	533
Grade 11	583	545	540	489	515
Grade 12	563	556	522	543	491
Ungraded	0	0	0	10	14
Total	6,920	6,654	6,560	6,484	6,294

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	935	846	910	961	923
Grade 1	949	1,002	903	966	983
Grade 2	943	967	1,018	933	975
Grade 3	1,051	970	977	1,012	963
Grade 4	1,068	1,065	984	978	1,006
Grade 5	1,024	1,075	1,067	1,004	985
Grade 6	1,085	1,036	1,082	1,093	996
Total	7,055	6,961	6,941	6,947	6,831

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	1,656	1,618	1,677	1,689	1,704
Grade 1	1,591	1,702	1,629	1,684	1,655
Grade 2	1,613	1,664	1,717	1,660	1,711
Grade 3	1,551	1,664	1,668	1,724	1,651
Grade 4	1,503	1,625	1,686	1,664	1,713
Grade 5	1,673	1,570	1,647	1,696	1,666
Grade 6	1,575	1,685	1,570	1,657	1,660
Grade 7	1,523	1,588	1,687	1,562	1,647
Grade 8	1,504	1,599	1,604	1,711	1,588
Grade 9	1,712	1,713	1,727	1,729	1,838
Grade 10	1,728	1,764	1,682	1,725	1,739
Grade 11	1,709	1,790	1,739	1,678	1,723
Grade 12	1,660	1,775	1,766	1,770	1,664
Ungraded	720	54	55	54	59
Total	21,718	21,811	21,854	22,003	22,018

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	4,183	4,175	4,288	4,291	4,481
Grade 1	4,195	4,177	4,234	4,183	4,208
Grade 2	4,077	4,021	4,035	4,011	4,127
Grade 3	4,015	3,909	3,876	3,868	3,941
Grade 4	3,869	3,852	3,788	3,776	3,821
Grade 5	3,622	3,809	3,793	3,715	3,755
Grade 6	3,429	3,383	3,594	3,651	3,577
Grade 7	3,391	3,466	3,371	3,608	3,628
Grade 8	3,253	3,322	3,342	3,338	3,560
Grade 9	3,435	3,262	3,093	3,080	3,080
Grade 10	3,414	3,271	3,111	3,057	3,087
Grade 11	2,885	3,058	2,933	2,926	2,905
Grade 12	2,848	2,879	3,014	2,982	3,024
Total	46,616	46,584	46,472	46,486	47,194

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	2,177	2,282	2,240	2,340	2,616
Grade 1	2,280	2,244	2,327	2,238	2,134
Grade 2	2,156	2,257	2,215	2,271	2,191
Grade 3	2,204	2,199	2,260	2,216	2,256
Grade 4	2,286	2,269	2,160	2,248	2,206
Grade 5	2,282	2,326	2,276	2,162	2,223
Grade 6	2,184	2,306	2,329	2,276	2,148
Grade 7	2,300	2,233	2,313	2,318	2,290
Grade 8	2,317	2,348	2,245	2,324	2,332
Grade 9	2,489	2,382	2,362	2,276	2,340
Grade 10	2,549	2,485	2,369	2,340	2,280
Grade 11	2,448	2,538	2,480	2,336	2,325
Grade 12	2,538	2,504	2,560	2,509	2,409
Total	30,210	30,373	30,136	29,854	29,750

by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	315	321	331	314	331
Grade 1	284	291	305	308	299
Grade 2	288	289	279	288	302
Grade 3	282	294	291	275	293
Grade 4	282	273	275	285	276
Grade 5	280	284	282	271	269
Grade 6	307	293	299	284	263
Grade 7	298	322	279	301	253
Grade 8	350	286	317	296	307
Total	2,686	2,653	2,658	2,622	2,593

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Grade 9	756	688	626	630	592
Grade 10	718	708	658	582	603
Grade 11	677	706	673	633	575
Grade 12	711	635	657	607	591
Total	2,862	2,737	2,614	2,452	2,361

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	2,071	2,207	2,209	2,236	2,395
Grade 1	2,238	2,153	2,228	2,317	2,133
Grade 2	2,223	2,265	2,114	2,216	2,349
Grade 3	2,269	2,210	2,219	2,121	2,229
Grade 4	2,370	2,273	2,270	2,216	2,135
Grade 5	2,505	2,412	2,279	2,268	2,242
Grade 6	2,396	2,455	2,396	2,303	2,311
Grade 7	2,543	2,340	2,383	2,380	2,240
Grade 8	2,502	2,534	2,313	2,415	2,392
Grade 9	178	48	16	178	245
Grade 10	1	152	21	99	256
Grade 11	0	0	69	159	177
Grade 12	0	0	68	356	519
Total	21,296	21,049	20,585	21,264	21,623

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	752	796	760	792	766
Grade 1	763	693	702	687	692
Grade 2	724	788	697	737	701
Grade 3	820	761	832	740	745
Grade 4	843	860	771	862	761
Grade 5	816	868	896	787	891
Grade 6	959	899	930	967	838
Grade 7	950	982	920	953	976
Grade 8	1,007	977	1,000	934	973
Grade 9	1,032	1,122	1,077	1,109	1,016
Grade 10	1,047	1,064	1,131	1,089	1,117
Grade 11	1,090	1,044	1,080	1,145	1,092
Grade 12	1,083	1,074	1,044	1,071	1,132
Total	11,886	11,928	11,840	11,873	11,700

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	1,722	1,703	1,860	1,909	2,141
Grade 1	1,835	1,861	1,779	1,759	1,714
Grade 2	1,817	1,837	1,857	1,824	1,750
Grade 3	1,850	1,843	1,850	1,877	1,879
Grade 4	1,933	1,877	1,882	1,883	1,891
Grade 5	1,925	1,962	1,900	1,899	1,935
Grade 6	1,955	1,954	1,965	1,898	1,913
Grade 7	2,006	2,016	2,034	1,999	1,959
Grade 8	2,050	2,056	2,042	2,056	2,045
Grade 9	2,119	2,124	2,103	2,134	2,141
Grade 10	2,238	2,086	2,141	2,103	2,143
Grade 11	2,287	2,226	2,091	2,154	2,107
Grade 12	2,183	2,276	2,242	2,126	2,168
Ungraded	0	0	1	1	57
Total	25,920	25,821	25,747	25,622	25,843

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	309	283	252	264	274
Grade 1	333	338	305	275	262
Grade 2	326	342	327	296	284
Grade 3	293	322	337	324	289
Grade 4	342	288	325	343	334
Grade 5	298	356	292	311	345
Grade 6	334	299	358	302	319
Grade 7	368	325	299	358	280
Grade 8	373	365	320	305	355
Total	2,976	2,918	2,815	2,778	2,742

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	3,995	4,119	4,246	4,006	3,848
Grade 1	4,021	4,032	4,138	4,252	3,989
Grade 2	3,846	3,885	3,912	3,986	4,083
Grade 3	3,699	3,844	3,836	3,834	3,878
Grade 4	3,739	3,663	3,759	3,780	3,755
Grade 5	3,644	3,717	3,673	3,698	3,718
Grade 6	3,595	3,592	3,643	3,572	3,616
Grade 7	3,507	3,493	3,540	3,563	3,450
Grade 8	3,557	3,483	3,457	3,514	3,527
Grade 9	3,746	3,461	3,355	3,342	3,358
Grade 10	3,775	3,631	3,384	3,288	3,275
Grade 11	3,525	3,442	3,429	3,216	3,093
Grade 12	3,168	3,432	3,459	3,437	3,312
Ungraded	73	102	108	128	129
Total	47,890	47,896	47,939	47,616	47,031

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Grade 6	4	0	0	1	1
Grade 7	19	2	9	0	5
Grade 8	23	12	29	22	26
Grade 9	14	16	24	24	25
Grade 10	8	5	9	15	10
Grade 11	3	2	15	27	22
Grade 12	1	5	21	25	37
Total	72	42	107	114	126

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	4,841	4,664	4,788	4,855	4,898
Grade 1	4,535	4,681	4,665	4,682	4,635
Grade 2	4,174	4,431	4,637	4,549	4,561
Grade 3	4,062	4,123	4,405	4,585	4,506
Grade 4	4,046	4,021	4,168	4,347	4,482
Grade 5	3,861	4,034	4,046	4,155	4,298
Grade 6	3,718	3,631	3,841	3,869	3,887
Grade 7	3,761	3,710	3,682	3,889	3,866
Grade 8	3,846	3,775	3,759	3,695	3,939
Grade 9	4,860	4,601	4,425	4,261	4,218
Grade 10	4,846	4,706	4,516	4,576	4,337
Grade 11	4,243	4,834	4,759	5,223	5,225
Grade 12	4,347	4,357	4,531	4,284	4,768
Ungraded	0	3	0	0	0
Total	55,140	55,571	56,222	56,970	57,620

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	369	344	367	361	365
Grade 1	392	433	363	378	373
Grade 2	383	388	433	368	385
Grade 3	376	394	397	429	375
Grade 4	446	373	386	386	408
Grade 5	423	439	378	391	394
Grade 6	379	405	442	372	382
Grade 7	458	405	442	471	401
Grade 8	454	441	406	466	477
Grade 9	750	744	683	599	610
Grade 10	942	916	843	738	671
Grade 11	809	814	819	817	702
Grade 12	819	750	769	797	826
Total	7,000	6,846	6,728	6,573	6,369

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	918	766	841	883	879
Grade 1	819	841	771	833	850
Grade 2	812	836	828	752	811
Grade 3	809	823	837	838	769
Grade 4	847	819	811	837	855
Grade 5	839	853	817	815	841
Grade 6	908	880	838	868	840
Grade 7	892	913	892	850	859
Grade 8	922	902	941	896	881
Grade 9	978	965	919	960	886
Grade 10	956	984	973	920	983
Grade 11	1,002	947	1,001	923	926
Grade 12	1,021	1,033	999	1,042	961
Total	11,723	11,562	11,468	11,417	11,341

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Grade 1	1	0	0	0	0
Grade 2	2	2	1	1	0
Grade 3	2	2	3	2	4
Grade 4	2	2	3	4	3
Grade 5	67	66	67	66	66
Grade 6	67	68	68	72	74
Grade 7	1,551	1,510	1,519	1,577	1,452
Grade 8	1,709	1,630	1,553	1,547	1,597
Grade 9	2,052	2,267	2,260	2,192	2,206
Grade 10	1,910	2,025	2,134	2,035	1,882
Grade 11	2,048	1,743	1,893	1,966	1,941
Grade 12	2,255	2,161	1,853	1,771	1,969
Ungraded	0	0	0	0	1
Total	11,666	11,476	11,354	11,233	11,195

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	753	768	795	849	1,010
Grade 1	759	770	751	784	678
Grade 2	710	733	730	738	754
Grade 3	696	685	720	724	717
Grade 4	696	690	672	713	709
Grade 5	606	658	641	643	690
Grade 6	592	586	638	639	635
Grade 7	52	45	50	51	66
Grade 8	45	48	48	56	42
Grade 9	2	0	0	0	0
Total	4,911	4,983	5,045	5,197	5,301

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	1,398	1,478	1,395	1,361	1,338
Grade 1	1,415	1,466	1,508	1,418	1,319
Grade 2	1,462	1,436	1,456	1,497	1,415
Grade 3	1,463	1,491	1,433	1,465	1,473
Grade 4	1,523	1,448	1,486	1,453	1,453
Grade 5	1,533	1,529	1,465	1,514	1,472
Grade 6	1,550	1,539	1,552	1,470	1,542
Grade 7	18	0	0	0	0
Total	10,362	10,387	10,295	10,178	10,012

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	352	335	357	386	399
Grade 1	318	323	341	351	338
Grade 2	358	321	333	335	349
Grade 3	344	334	317	336	329
Grade 4	345	313	348	314	337
Grade 5	364	347	323	348	334
Grade 6	382	350	344	328	347
Total	2,463	2,323	2,363	2,398	2,433

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	50	52	53	48	61
Grade 1	43	45	45	45	42
Grade 2	50	28	39	35	36
Grade 3	44	43	31	38	29
Grade 4	36	44	45	27	36
Grade 5	47	35	47	41	30
Grade 6	59	45	36	40	42
Grade 7	51	52	39	35	42
Grade 8	45	48	48	36	31
Total	425	392	383	345	349

by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	386	373	392	342	359
Grade 1	435	369	370	373	319
Grade 2	410	418	349	354	365
Grade 3	425	391	399	336	348
Grade 4	387	411	401	377	326
Grade 5	415	386	404	403	367
Grade 6	425	407	398	384	392
Grade 7	427	382	363	366	376
Grade 8	444	427	386	368	380
Total	3,754	3,564	3,462	3,303	3,232

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	43	47	44	35	54
Grade 1	41	35	47	33	33
Grade 2	45	42	34	36	37
Grade 3	41	45	40	32	39
Grade 4	42	38	44	36	31
Grade 5	44	37	42	40	34
Grade 6	39	46	35	33	39
Grade 7	35	41	48	38	34
Grade 8	52	35	39	38	38
Grade 9	43	53	33	42	36
Grade 10	43	41	43	30	40
Grade 11	42	40	35	42	33
Grade 12	33	39	36	36	40
Total	543	539	520	471	488

Chart Notes Source

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	1,767	1,656	1,740	1,664	1,657
Grade 1	1,836	1,857	1,787	1,848	1,702
Grade 2	1,776	1,882	1,872	1,784	1,822
Grade 3	1,813	1,816	1,904	1,897	1,785
Grade 4	1,713	1,827	1,819	1,895	1,902
Grade 5	1,670	1,783	1,858	1,823	1,893
Grade 6	1,699	1,743	1,840	1,910	1,844
Grade 7	1,728	1,772	1,786	1,851	1,921
Grade 8	1,683	1,746	1,768	1,795	1,875
Grade 9	1,788	1,881	1,914	1,911	1,963
Grade 10	1,728	1,794	1,824	1,881	1,907
Grade 11	1,692	1,703	1,750	1,810	1,881
Grade 12	1,561	1,633	1,645	1,702	1,797
Total	22,454	23,093	23,507	23,771	23,949

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	119	113	146	147	123
Grade 1	118	116	113	159	155
Grade 2	117	122	125	119	149
Grade 3	131	107	118	121	112
Grade 4	117	133	124	131	125
Grade 5	131	114	129	129	130
Grade 6	142	128	125	138	128
Grade 7	135	150	156	146	150
Grade 8	142	123	145	150	148
Total	1,152	1,106	1,181	1,240	1,220

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	959	920	1,014	897	910
Grade 1	1,015	1,015	1,007	1,027	928
Grade 2	1,052	1,006	1,062	964	1,048
Grade 3	1,068	1,053	1,056	1,037	966
Grade 4	1,144	1,096	1,123	997	1,039
Grade 5	1,120	1,178	1,174	1,060	985
Grade 6	1,169	1,181	1,243	1,179	1,110
Grade 7	1,386	1,299	1,345	1,227	1,283
Grade 8	1,373	1,405	1,415	1,334	1,282
Grade 9	1,150	1,252	1,307	1,224	1,257
Grade 10	1,060	1,165	1,276	1,248	1,211
Grade 11	1,095	1,102	1,230	1,186	1,250
Grade 12	934	993	1,050	1,080	1,117
Ungraded	0	0	0	0	16
Total	14,525	14,665	15,302	14,460	14,402

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	807	792	855	893	947
Grade 1	924	895	874	960	975
Grade 2	903	896	867	891	981
Grade 3	919	884	895	908	906
Grade 4	957	941	895	915	967
Grade 5	921	986	969	974	984
Grade 6	1,031	970	1,012	1,028	1,018
Grade 7	1,152	1,097	1,030	1,050	1,084
Grade 8	1,101	1,144	1,128	1,026	1,089
Total	8,715	8,605	8,525	8,645	8,951

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	807	792	855	893	947
Grade 1	924	895	874	960	975
Grade 2	903	896	867	891	981
Grade 3	919	884	895	908	906
Grade 4	957	941	895	915	967
Grade 5	921	986	969	974	984
Grade 6	1,031	970	1,012	1,028	1,018
Grade 7	1,152	1,097	1,030	1,050	1,084
Grade 8	1,101	1,144	1,128	1,026	1,089
Total	8,715	8,605	8,525	8,645	8,951

Grade 8	2	1	1	30	8
Grade 9	3,426	3,405	3,256	3,191	3,096
Grade 10	3,238	3,426	3,418	3,305	3,266
Grade 11	3,338	3,233	3,406	3,391	3,303
Grade 12	3,550	3,456	3,374	3,454	3,470
Ungraded	112	112	113	115	120
Total	13,666	13,633	13,568	13,486	13,263

Enrollment by Grade	2009-10	2010-11	2011-12	2012-13	2013-14
Kindergarten	1,063	1,121	1,118	1,119	1,107
Grade 1	1,180	1,074	1,108	1,085	1,096
Grade 2	1,063	1,117	1,036	1,089	1,061
Grade 3	1,063	1,047	1,085	1,032	1,087
Grade 4	1,032	1,050	1,046	1,091	1,047
Grade 5	1,026	1,036	1,053	1,039	1,096
Grade 6	969	1,005	1,025	1,033	1,048
Grade 7	999	946	993	1,004	1,005
Grade 8	922	999	958	985	997
Grade 9	986	936	1,000	970	1,000
Grade 10	960	970	946	1,007	955
Grade 11	969	932	936	901	966
Grade 12	1,039	967	924	943	936
Total	13,271	13,200	13,228	13,298	13,401

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 July 22, 2015, I served the:

Claimant Comments
Request to Amend Parameters and Guidelines
Immunization Records - Pertussis, 14-PGA-01 (11-TC-02)
Health and Safety Code Section 120335
Statutes 2010, Chapter 434 (AB 354)
Desert Sands Unified School District, Requester

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 July 22, 2015 at Sacramento, California.

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

COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 7/8/15

Claim Number: 14-PGA-01 (11-TC-02)

Matter: Immunization Records - Pertussis

Requester: Desert Sands 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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