

Tulare Joint Union High School District

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February 10, 2015

RECEIVED
February 13, 2015
**Commission on
State Mandates**

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:

On behalf of the Tulare Joint Union High School District, I submit this written comment regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") is a reimbursable state mandate. The District strongly supports the position of the test claimants. Between last year (2013-14) and this year (2014-15), my District estimates that it has spent or will spend a combined total of \$2 million in preparing to administer the CAASPP.

Specifically for our District, preparing to implement the CAASPP has meant making investments to support technology through infrastructure at a cost of \$1 million, cost of materials to support common core at approximately \$400,000, an estimated cost of \$270,000 to support teachers with common core, and an additional \$237,000 in technology support for teachers through the hiring of two instructional technology coaches.

While the CAASPP is an important and worthy policy, it clearly imposes requirements on districts. Not only are districts required to administer the CAASPP but they have no choice on how to administer it. As a result, the districts are forced to invest significant funds to expand internet infrastructure, increase software and hardware purchases, offer additional professional development, and hire more staff. It is also important to remember that the requirements to administer the CAASPP are likely to change over time, requiring an ongoing investment of funds

Article XIII B, Section 6 of the California Constitution states that "[w]henever the Legislature or any state agency mandates a new program or higher level of service on any local government, the state shall provide a subvention of funds to reimburse such local

government for the costs of such programs or increased level of service.” The purpose of this provision is to “preclude the state from shifting financial responsibility for carrying out governmental functions to local agencies, which are ‘ill equipped’ to assume increased financial responsibilities because of the taxing and spending limitations that article XIII A and XIII B impose.” (County of San Diego v. State of California (1997) 15 Cal.4th 68, 81.) In light of this constitutional obligation, I respectfully request that the Commission find for the test claimants and hold that the CAASPP constitutes a reimbursable state mandate.

Sincerely,



Sarah Koligian, Ed.D.
Superintendent

cc: Josh Daniel, CSBA
Jeff Frost, CVEC
Tom Addington, ACSA
TJUHSD Board Members

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 February 17, 2015, I served the:

Cupertino Union High School District Comments;
Del Norte County Office of Education Comments;
San Lorenzo Valley Unified School District Comments;
Santa Rosa City Schools District Comments;
Tulare Joint Union High School District Comments;
Visalia Unified School District Comments;
and Belmont-Redwood Shores School District Comments

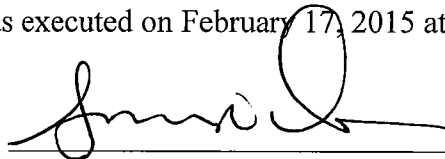
California Assessment of Student Performance and Progress (CAASPP), 14-TC-01
Education Code Sections 60602, 60603, 60604, 60607, 60610, 60611, 60612, 60640,
60641, 60642.6, 60643, 60643.6, 60648, 60648.5, 60649, 60810, 99300, and 99301;
Statutes 2013-2014, Chapter 489 (AB 484); Statutes 2014 Chapter 32, (SB 858);
Statutes 2014, Chapter 327 (AB 1599);

California Code of Regulations, Title 5, Section 850 through 864, inclusive;
(Register 2014, No. 30; Effective Date: July 23, 2014)

Santa Ana Unified School District, Porterville Unified School District, Plumas County
Office of Education, Plumas Unified School District, Claimants

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 February 17, 2015 at Sacramento, California.



Lorenzo Duran
Commission on State Mandates
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(916) 323-3562

COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 2/17/15

Claim Number: 14-TC-01

Matter: California Assessment of Student Performance and Progress (CAASPP)

Claimants: Plumas County Office of Education
Plumas Unified School District
Porterville Unified School District
Santa Ana 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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