



DEPARTMENT OF  
**FINANCE**

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February 16, 2016

Commission on  
State Mandates

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February 16, 2016

Ms. Heather Halsey  
Executive Director  
Commission on State Mandates  
980 Ninth Street, Suite 300  
Sacramento, California 95814

**Re: California Assessment of Student Performance and Progress (CAASPP) Parameters and Guidelines**

Dear Ms. Halsey:

The Department of Finance (Finance) has reviewed the draft expedited parameters and guidelines and the claimants' rebuttal comments dated February 11, 2016 for the consolidated test claim 14-TC-01 and 14-TC-04, California Assessment of Student Performance and Progress (CAASPP).

**Draft Parameters and Guidelines**

Finance believes that the following amendments to the draft expedited parameters and guidelines are necessary to ensure that the parameters and guidelines conform to the Commission's February 4, 2016, corrected decision on the test claim:

Section I summarizes the decision of the Commission; the bullets beginning on page one list the activities that are reimbursable. The first bullet indicates that administering the CAASPP assessments to all pupils via computer is a reimbursable activity. This bullet should be amended to specify that costs are only reimbursable for administration of the CAASPP summative assessments. Administering the CAASPP interim and formative assessments (including the digital library) are optional, and therefore are not reimbursable activities. This amendment is supported by the Commission's finding that "provisions of section 853 describing the availability of interim assessment and formative assessment tools do not contain any mandatory or directory language requiring school districts to use these assessments or tools." Further, this bullet should be amended to clarify that only costs associated with assessments for pupils in specified grade levels, as defined in Education Code Section 60640 and California Code of Regulations, title 5, section 850(k) (Register 2014, No. 35), are reimbursable.

Section I, beginning on page two, includes bullets listing the state and federal funds that must be deducted as offsetting revenues from any reimbursement claims. The first bullet references \$1.25 billion in Common Core implementation funding that was provided in 2013 *if* used by a school district on reimbursable CAASPP activities to support the administration of computer-based assessments. The phrase "...to support the administration of computer-based assessments" is unnecessary and could be interpreted as referencing a subset of the reimbursable activities—only those explicitly using computers and not those related to parent notifications and state reporting, for example. This bullet should be amended to clarify that the

\$1.25 billion in Common Core implementation funding is considered offsetting revenues *if* used by a school district on any of the reimbursable CAASPP activities.

Section V, subsection A, beginning on page five, specifies the direct costs that are eligible for reimbursement, and how those costs must be reported. When claiming reimbursement for fixed assets, including computers, the parameters and guidelines appropriately specify that only the pro-rata portion of the purchase price used to implement the reimbursable activities can be claimed. However, the "Fixed Assets" section should be amended to require claimants to report: (1) the dates and times within the assigned testing window they administered the CAASPP summative assessments; and (2) the technology infrastructure and device inventory that was replaced to accommodate the CAASPP summative assessments. These amendments are necessary to ensure that the costs for fixed assets used for purposes other than CAASPP summative assessment administration are not reimbursed. Further, these amendments will ensure that only the costs for fixed assets that were absolutely necessary for meeting the minimum technology requirements of the CAASPP summative assessments are reimbursed.

As background, the 2014 Smarter Balanced Field Test was administered from March 25 through June 6, 2014, during a testing window assigned by the testing contractor. Schools in California were assigned to two of the following four windows, within which they established their own unique testing schedules:

- Window 1: March 25 through April 4, 2014
- Window 2: April 7 through April 25, 2014
- Window 3: April 28 through May 16, 2014
- Window 4: May 19 through June 6, 2014

Per California Code of Regulations, Title 5, Sections 855(b)(1) and 855(b)(2), the testing window for the 2014-15 Smarter Balanced assessments in English Language Arts and mathematics was as follows:

- For grades 3-8, the testing window shall not begin until at least 66 percent of a school's annual instructional days have been completed, and testing may continue up to and including the last day of instruction for the regular school calendar. This allows for a 12-week testing window.
- For grade 11, the testing window shall not begin until at least 80 percent of a school's annual instructional days have been completed, and testing may continue up to and including the last day of instruction for the regular school calendar year. This allows for a 7-week testing window.

The parameters and guidelines specify that "...the acquisition of and ongoing compliance with *minimum* technology requirements" are reimbursable costs [emphasis added]. The computer-based CAASPP assessments were designed to work on a variety of older hardware and operating system configurations. In order to determine if a purchase is reimbursable, it will be necessary to first know whether a district already had infrastructure and/or devices in place that met the minimum technology requirements for test administration.

Details about the minimum technology requirements can be found in the Smarter Balanced report, *Technology Strategy Framework and Testing Device Requirements*, available on the Smarter Balanced Technology Website (<http://www.smarterbalanced.org/smarter-balanced-assessments/technology/>). We note that the Smarter Balanced report describes two levels of hardware specifications: minimum and recommended. As previously stated, only the costs associated with acquiring and maintaining the minimum technology requirements for administering the CAASPP summative assessments are reimbursable.

### Claimants' Rebuttal Comments

Finance requests that comment number one, requesting to add "Beginning February 3, 2014, the local educational agency/CAASPP test site coordinator shall be responsible for ensuring that all designated supports, accommodations and individuals aids are entered into the registration system" to the list of reimbursable activities be amended to conform to the Commission's corrected decision. The Commission, in its February 4, 2016 corrected test claim decision, found this activity to be reimbursable beginning August 27, 2014.

Finance opposes comment number two, requesting to add "The reimbursement costs shall include, but is not limited to, the following: computers, laptops, Ipads, tablets, Professional Development, training, Consultants, servers, broadband, carts, peripheral infrastructure equipment: fiber optic cabling, headphones; earplugs; keyboards; microphones, electrical cords; hardware and software." As noted above, the Commission found that the costs associated with acquiring and maintaining the minimum technology requirements are reimbursable. Therefore, it is critical that the parameters and guidelines are clear that any technology costs claimed that are in excess of the minimum technology requirements will not be reimbursed. We believe including loose terms, including, but not limited to, "computers", "headphones", "microphones", and "earplugs" could be interpreted in a way that expands the scope of reimbursable technology costs, because it is possible that many computers and headphones, and all microphones and earplugs, claimed under these parameters and guidelines will exceed the minimum technology requirements. Our concerns are supported by the minimum technology requirements, which: (1) establish the minimum computer specifications; (2) state that *standard* headphones connected via standard TRS connections will suffice; (3) state that microphones are not required; and (4) make no reference to earplugs.

Finance opposes comment number four, requesting to add "The reimbursement costs shall include, but is not limited to, the following: Making arrangements for the testing of all eligible pupils in alternative education programs or programs conducted off campus, including, but not limited to, non-classroom based programs, continuation schools, independent study, community day schools, county community schools, juvenile court schools, or NPSs" to the third bullet listed on page four of the parameters and guidelines. We oppose the claimants' request because making arrangements for students in these types of nontraditional programs is not new under CAASPP, and the Commission has already ruled accordingly. Specifically, in its January 22, 2016 adopted test claim decision, the Commission found that California Code of Regulations, title 5, section 851, as amended by the test claim regulations, does not impose any new requirements on school districts. Prior to the test claim regulations, section 851 required school districts to "make whatever arrangements are necessary to test all eligible pupils in alternative education programs or programs conducted off campus, including...continuation schools, independent study, community day schools, county community schools, juvenile court schools, or nonpublic schools."

Ms. Heather Halsey  
February 16, 2016  
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If you have any questions regarding this letter, please contact Ian Johnson, Principal Program Budget Analyst for the Department of Finance, at (916) 445-0328.

Sincerely,

A handwritten signature in blue ink, appearing to read 'TT', with a stylized flourish extending to the right.

THOMAS TODD  
Assistant Program Budget Manager

**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 18, 2016, I served the:

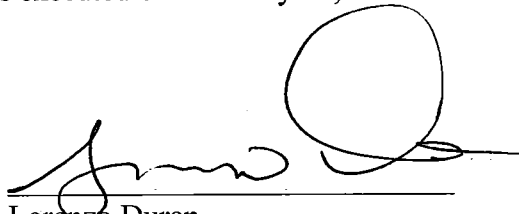
**Finance Comments on Draft Expedited Parameters and Guidelines and Claimant  
Rebuttal Comments**

*California Assessment of Student Performance and Progress (CAASPP), 14-TC-01  
Education Code Sections 60602 et al.*

Plumas County Office of Education, Plumas Unified School District, Porterville Unified  
School District, Santa Ana Unified School District, and Vallejo City 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 18, 2016 at Sacramento, California.



Lorenzo Duran  
Commission on State Mandates  
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# COMMISSION ON STATE MANDATES

## Mailing List

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**Claim Number:** 14-TC-01 and 14-TC-04

**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  
Vallejo City Unified School District

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