



DEPARTMENT OF
FINANCE

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March 21, 2016
**Commission on
State Mandates**

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March 21, 2016

LATE FILING

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 proposed parameters and guidelines dated March 11, 2016 for the consolidated test claim 14-TC-01 and 14-TC-04, California Assessment of Student Performance and Progress (CAASPP).

We agree with the revisions that have been made thus far to ensure that the parameters and guidelines are consistent with the Commission's February 4, 2016, corrected decision on the test claim. However, we note a few areas where further clarification is needed.

The proposed parameters and guidelines state that for new purchases, the "Recommended Smarter Balanced Minimum for New Purchases" must be taken into consideration when determining reimbursable costs. We believe that the parameters and guidelines should be amended to clarify that, if a district chooses to exceed these recommended standards when purchasing new equipment and devices, only the costs associated with meeting the standards are reimbursable.

Additionally, we note that the Smarter Balanced report, *Technology Strategy Framework and Testing Device Requirements*, does not differentiate between current computers and new purchases when it comes to establishing the minimum requirements for several devices, including screen size. Ten-inch class devices (defined as a minimum of 9.5 inches measured diagonally) supporting 1024x768 display resolution are the minimum requirement for Smarter Balanced Assessments, as stated in the Smarter Balanced report. In the absence of a separate minimum standard for new purchases, we believe that the standard outlined for current computers should also apply for purposes of determining reimbursable costs for justifiable new purchases.

With respect to the first mandated activity, the second numeral under Section IV.A, beginning on page twenty-six, references broadband internet service providing at least 20 Kbps per pupil to be tested simultaneously. The phrase "... at least" should be deleted, as the minimum technology standards state that the Smarter Balanced assessment will require 10–20 Kbps per student or less. As currently drafted, this section could be interpreted to require reimbursement for costs associated with attaining speeds greater than the minimum speed that the Smarter Balanced Assessment Consortium has determined is necessary to administer the online assessments.

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Finally, while we believe it will be necessary to carefully evaluate all claims submitted during the claiming process, it will be particularly important to examine cases where districts argue that they needed to purchase additional devices to administer the assessments to all eligible students within the testing window. Before new purchases and upgrades can be found to be justifiable, and in turn reimbursable, consideration of a number of factors, including, but not limited to, the number of eligible test taking students, whether the school used the entire available testing window, the length of time required for test administration, and the number of existing devices will need to occur. Such an evaluation is necessary to determine if schools could have structured test administration in such a way as to be able to successfully administer the assessments using their existing devices and/or infrastructure before deciding to make new purchases.

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,



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 March 21, 2016, I served the:

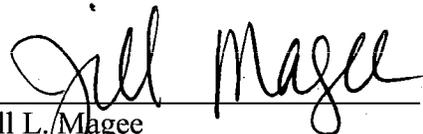
Finance Late Comments on Proposed Decision and Parameters and Guidelines
California Assessment of Student Performance and Progress (CAASPP),
14-TC-01 and 14-TC-04

Education Code Section 60640, as amended by Statutes 2013, Chapter 489 (AB 484) and Statutes 2014, Chapter 32 (SB 858); California Code of Regulations, Title 5, Sections 850, 852, 853, 853.5, 857, 861(b)(5), and 864, as added or amended by Register 2014, Nos. 6, 30, and 35

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 March 21, 2016 at Sacramento, California.



Jill L. Magee
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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 3/14/16

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

TO ALL PARTIES, INTERESTED PARTIES, AND INTERESTED PERSONS:

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