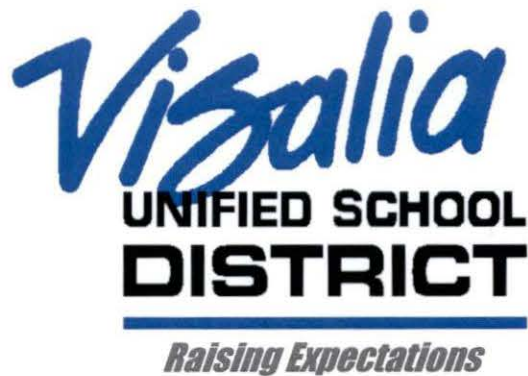


Craig Wheaton, Ed.D.
Superintendent

Robert Gröeber
Assistant Superintendent
Administrative Services



Board of Education

John Crabtree
Juan Guerrero
William A. Fulmer
Donna Martin
Jim L. Qualls
Charles Ulmschneider
Lucia Vazquez

RECEIVED

February 13, 2015

**Commission on
State Mandates**

February 5, 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:

On behalf of Visalia Unified School District ("District"), I, Robert Gröeber, Assistant Superintendent for Administrative Services, submit this written comment regarding Test Claim 14-TC-01 alleging that the California Assessment of Student Performance and Progress ("CAASPP") constitutes 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 incurred or will incur significant, ongoing expenses in preparing to administer and in administering the CAASPP.

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 in how to administer it. Specifically for my District, preparing to administer and actually administering the CAASPP has required the following actions:

- Hire new staff such as computer technicians and other support personnel
- Repurpose existing staff time for CAASPP tasks such as installing necessary infrastructure upgrades, administering the assessment, training students use the devices, hardware, and software, etc.
- Provide additional training for staff in the areas of new computer software and hardware, test administration, etc.
- Purchase new hardware for pupils or staff such as Chromebooks and carts
- Purchase new technology accessories such as headphones and mice
- Purchase and install new technology infrastructure such as routers, switches, WiFi access points and controllers
- Upgrade the District's bandwidth
- Educate district students and families regarding CAASPP requirements and impact

These required actions have necessitated and will necessitate a significant expenditure of funds, potentially impacting other priority programs and areas.

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.

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.

Best Regards,



Robert Gröeber
Assistant Superintendent, Administrative Services

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**

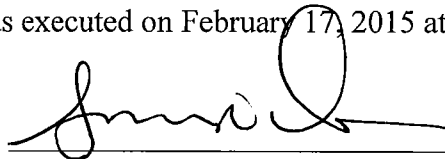
California Assessment of Student Performance and Progress (CAASPP), 14-TC-01
Education Code Sections 60602, 60603, 60604, 60607, 60610, 60611, 60612, 60640,
60641, 60642.6, 60643, 60643.6, 60648, 60648.5, 60649, 60810, 99300, and 99301;
Statutes 2013-2014, Chapter 489 (AB 484); Statutes 2014 Chapter 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
980 Ninth Street, Suite 300
Sacramento, CA 95814
(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.)

Amber Alexander, *Department of Finance*

Education Systems Unit, 915 L Street, Sacramento, CA 95814

Phone: (916) 445-0328

Amber.Alexander@dof.ca.gov

Socorro Aquino, *State Controller's Office*

Division of Audits, 3301 C Street, Suite 700, Sacramento, CA 95816

Phone: (916) 322-7522

SAquino@sco.ca.gov

Harmeet Barkschat, *Mandate Resource Services, LLC*

5325 Elkhorn Blvd. #307, Sacramento, CA 95842

Phone: (916) 727-1350

harmeet@calsdrc.com

Lacey Baysinger, *State Controller's Office*

Division of Accounting and Reporting, 3301 C Street, Suite 700, Sacramento, CA 95816

Phone: (916) 324-0254

lbaysinger@sco.ca.gov

Mike Brown, *School Innovations & Advocacy*

5200 Golden Foothill Parkway, El Dorado Hills, CA 95762

Phone: (916) 669-5116

mikeb@sia-us.com

Laurie Bruton, Superintendent, *San Lorenzo Valley Unified School District*
325 Marion Ave, Ben Lomond, CA 95005
Phone: (831) 336-5194
lbruton@slvUSD.org

J. Bradley Burgess, *MGT of America*
895 La Sierra Drive, Sacramento, CA 95864
Phone: (916) 595-2646
Bburgess@mgtamer.com

Gwendolyn Carlos, *State Controller's Office*
Division of Accounting and Reporting, 3301 C Street, Suite 700, Sacramento, CA 95816
Phone: (916) 323-0706
gcarlos@sco.ca.gov

David Cichella, *California School Management Group*
3130-C Inland Empire Blvd., Ontario, CA 91764
Phone: (209) 834-0556
dcichella@csmcentral.com

Joshua Daniels, Attorney, *California School Boards Association*
3251 Beacon Blvd, West Sacramento, CA 95691
Phone: (916) 669-3266
jdaniels@csba.org

Marieta Delfin, *State Controller's Office*
Division of Accounting and Reporting, 3301 C Street, Suite 700, Sacramento, CA 95816
Phone: (916) 322-4320
mdelfin@sco.ca.gov

Andra Donovan, *San Diego Unified School District*
Legal Services Office, 4100 Normal Street, Room 2148, , San Diego, CA 92103
Phone: (619) 725-5630
adonovan@sandi.net

Donna Ferebee, *Department of Finance*
915 L Street, Suite 1280, Sacramento, CA 95814
Phone: (916) 445-3274
donna.ferebee@dof.ca.gov

Chris Ferguson, *Department of Finance*
Education Systems Unit, 915 L Street, 7th Floor, 915 L Street, 7th Floor, Sacramento, CA 95814
Phone: (916) 445-3274
Chris.Ferguson@dof.ca.gov

Susan Geanacou, *Department of Finance*
915 L Street, Suite 1280, Sacramento, CA 95814
Phone: (916) 445-3274
susan.geanacou@dof.ca.gov

Paul Golaszewski, *Legislative Analyst's Office*
925 L Street, Suite 1000, Sacramento, CA 95814
Phone: (916) 319-8341

Paul.Golaszewski@lao.ca.gov

Robert Groeber, Assistan Superintendent, *Visalia Unified School District*
5000 West Cypress Ave P.O. Box, Visalia, CA 93278-5004
Phone: (559) 730-7529
rgroeber@visalia.k12.ca.us

Wendy Gudalewicz, Superintendent, *Cupertino Union School District*
10301 Vista Drive, Cupertino, CA 95014-2091
Phone: (408) 252-3000
gudalewicz_wendy@cusdk8.org

Ed Hanson, *Department of Finance*
Education Systems Unit, 915 L Street, 7th Floor, Sacramento, CA 95814
Phone: (916) 445-0328
ed.hanson@dof.ca.gov

Mark Ibele, *Senate Budget & Fiscal Review Committee*
California State Senate, State Capitol Room 5019, Sacramento, CA 95814
Phone: (916) 651-4103
Mark.Ibele@sen.ca.gov

Cheryl Ide, Associate Finance Budget Analyst, *Department of Finance*
Education Systems Unit, 915 L Street, Sacramento, CA 95814
Phone: (916) 445-0328
Cheryl.ide@dof.ca.gov

Ian Johnson, Principal Program Budget Analyst, *Department of Finance*
Education Systems Unit, 915 L Street, Sacramento, CA 95814
Phone: (916) 445-0328
Ian.Johnson@dof.ca.gov

Matt Jones, *Commission on State Mandates*
980 9th Street, Suite 300, Sacramento, CA 95814
Phone: (916) 323-3562
matt.jones@esm.ca.gov

Jill Kanemasu, *State Controller's Office*
Division of Accounting and Reporting, 3301 C Street, Suite 700, Sacramento, CA 95816
Phone: (916) 322-9891
jkanemasu@sco.ca.gov

Jillian Kisse, *Department of Finance*
915 L Street, Sacramento, Ca
Phone: (916) 445-0328
jillian.kisse@dof.ca.gov

Sarah Koligian, Superintendent, *Tulare Joint Union High School District*
426 North Blackstone, Tulare, CA 93274-4449
Phone: (559) 688-2021
sarah.koligian@tulare.k12.ca.us

Jennifer Kuhn, Deputy, *Legislative Analyst's Office*
925 L Street, Suite 1000, Sacramento, CA 95814
Phone: (916) 319-8332

Jennifer.kuhn@lao.ca.gov

Jay Lal, *State Controller's Office (B-08)*

Division of Accounting & Reporting, 3301 C Street, Suite 700, Sacramento, CA 95816

Phone: (916) 324-0256

JLal@sco.ca.gov

Veronica Lanto, *San Jose Unified School District*

855 Lenzen Avenue, San Jose, CA 95126-2736

Phone: (408) 535-6572

Veronica_Lanto@sjusd.org

Kathleen Lynch, *Department of Finance (A-15)*

915 L Street, Suite 1280, 17th Floor, Sacramento, CA 95814

Phone: (916) 445-3274

kathleen.lynch@dof.ca.gov

Michelle Mendoza, *MAXIMUS*

17310 Red Hill Avenue, Suite 340, Irvine, CA 95403

Phone: (949) 440-0845

michellemendoza@maximus.com

Yazmin Meza, *Department of Finance*

915 L Street, Sacramento, CA 95814

Phone: (916) 445-0328

Yazmin.meza@dof.ca.gov

Micheline G. Miglis, Superintendent, *Plumas County Office of Education*

Plumas Unified School District, 1446 E. Main, Quincy, CA 95971

Phone: (530) 283-6500

mmiglis@pcoe.k12.ca.us

Richard L. Miller, Superintendent, *Santa Ana Unified School District*

1601 East Chestnut Avenue, Santa Ana, CA 92701

Phone: (714) 558-5512

rick.miller@sausd.us

Meredith Miller, Director of SB90 Services, *MAXIMUS*

3130 Kilgore Road, Suite 400, Rancho Cordova, CA 95670

Phone: (972) 490-9990

meredithcmiller@maximus.com

Michael Milliken, Superintendent, *Belmont-Redwood Shores School District*

2960 Hallmark Drive, Belmont, CA 94802-2999

Phone: (650) 637-4800

mmilliken@brssd.org

Robert Miyashiro, *Education Mandated Cost Network*

1121 L Street, Suite 1060, Sacramento, CA 95814

Phone: (916) 446-7517

robertm@sscal.com

Jameel Naqvi, Analyst, *Legislative Analysts' Office*

Education Section, 925 L Street, Suite 1000, Sacramento, CA 95814

Phone: (916) 319-8331

Jameel.naqvi@lao.ca.gov

Keith Nezaam, *Department of Finance*
915 L Street, 8th Floor, Sacramento, CA 95814
Phone: (916) 445-8913
Keith.Nezaam@dof.ca.gov

Andy Nichols, *Nichols Consulting*
1857 44th Street, Sacramento, CA 95819
Phone: (916) 455-3939
andy@nichols-consulting.com

Don Olson, Superintendent, *Del Norte County Office of Education*
301 W. Washington Blvd, Crescent City, CA 95531
Phone: (707) 464-0200
dolson@delnorte.k12.ca.us

Christian Osmena, *Department of Finance*
915 L Street, Sacramento, CA 95814
Phone: (916) 445-0328
christian.osmena@dof.ca.gov

Arthur Palkowitz, *Stutz Artiano Shinoff & Holtz*
Claimant Representative
2488 Historic Decatur Road, Suite 200, San Diego, CA 92106
Phone: (619) 232-3122
apalkowitz@sashlaw.com

Keith Petersen, *SixTen & Associates*
P.O. Box 340430, Sacramento, CA 95834-0430
Phone: (916) 419-7093
kpbsixten@aol.com

Mark Rewolinski, *MAXIMUS*
625 Coolidge Drive, Suite 100, Folsom, CA 95630
Phone: (949) 440-0845
markrewolinski@maximus.com

Sandra Reynolds, *Reynolds Consulting Group, Inc.*
P.O. Box 894059, Temecula, CA 92589
Phone: (951) 303-3034
sandrareynolds_30@msn.com

Kathy Rios, *State Controller's Office*
Division of Accounting and Reporting, 3301 C Street, Suite 700, Sacramento, CA 95816
Phone: (916) 324-5919
krios@sco.ca.gov

David Scribner, *Max8550*
2200 Sunrise Boulevard, Suite 240, Gold River, CA 95670
Phone: (916) 852-8970
dscribner@max8550.com

Steve Shields, *Shields Consulting Group, Inc.*
1536 36th Street, Sacramento, CA 95816

Phone: (916) 454-7310
steve@shieldscg.com

Socorro Shiels, Superintendent, *Santa Rosa City Schools*
211 Ridgway Ave, Santa Rosa, CA 95401
Phone: (707) 528-5181
sshields@srs.k12.ca.us

John Snavely, Superintendent, *Porterville Unified School District*
600 West Grand Avenue, Porterville, CA 93257
Phone: (559) 792-2455
jsnavely@portervilleschools.org

Jim Spano, Chief, Mandated Cost Audits Bureau, *State Controller's Office*
Division of Audits, 3301 C Street, Suite 700, Sacramento, CA 95816
Phone: (916) 323-5849
jspano@sco.ca.gov

Dennis Speciale, *State Controller's Office*
Division of Accounting and Reporting, 3301 C Street, Suite 700, Sacramento, CA 95816
Phone: (916) 324-0254
DSpeciale@sco.ca.gov

Meg Svoboda, *Senate Office of Research*
1020 N Street, Suite 200, Sacramento, CA
Phone: (916) 651-1500
meg.svoboda@sen.ca.gov

Amy Tang-Paterno, Educational Fiscal Services Consultant, *California Department of Education*
Government Affairs, 1430 N Street, Suite 5602, Sacramento, CA 95814
Phone: (916) 322-6630
ATangPaterno@cde.ca.gov

Jolene Tollenaar, *MGT of America*
2001 P Street, Suite 200, Suite 200, Sacramento, CA 95811
Phone: (916) 443-9136
jolene_tollenaar@mgtamer.com

Brian Uhler, *Legislative Analyst's Office*
925 L Street, Suite 1000, Sacramento, CA 95814
Phone: (916) 319-8328
brian.uhler@lao.ca.gov

Ronald D. Wenkart, General Counsel, *Orange County Department of Education*
200 Kalmus Drive P.O. Box, Costa Mesa, CA 92628-9050
Phone: (714) 966-4220
rwenkart@ocde.us