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February 2, 2015

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

RECEIVED
February 13, 2015
Commission on State Mandates

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 Del Norte County Unified School District (“District”), I Don Olson, Superintendent 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 an Educational Technology Coordinator
- Repurpose existing staff time for CAASPP tasks such as training principals, test coordinators and teachers to administer the test; training teachers to use the practice and training tests with students; and training students to use new devices purchased for the assessment.
- Provide additional training for staff in the areas of secure browser installation and hardware set up procedures for SBAC implementation.
- Purchase new hardware for pupils or staff such as laptops, carts, PCs, iPads, MacBooks, and Chromebooks.
- Purchase new technology accessories such as headsets, wired keyboard for iPads and cases for iPads.
- Purchase new technology infrastructure such as wireless access points.
- Upgrade the District’s bandwidth.
- Educate district students, families and support staff 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]henver 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.



Don Olson, Superintendent

Feedback from 5th grade teacher:

- As a school site we need to step up our game with technology. For example, with PC's, icons in the Startup menu automatically start running when the computer is turned on. When the Office package or the Instant Messenger were running, students could not login or begin the test. Making sure that all students have headphones and/or keyboards ready at their computer or iPad, or chromebook is critical. Teachers need to know that they have to be sure that the volume is at a level students can hear before they log in to the test. This points to the importance of investing in having another adult to assist with the setup so that these issues can be dealt with before I bring my students into the testing room. Our school doesn't have a technology person in the lab, so this responsibility falls on the teachers. One of my sympathies for my students was that at times, it would take a student nearly thirty minutes just to login to begin the test, and then to take a difficult and foreign test. So, we would definitely need to improve on working out all the kinks so that logins can be swift and less than 5 minutes.

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**

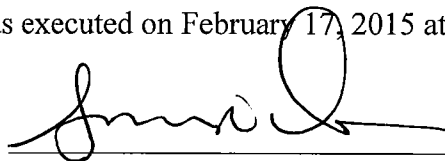
California Assessment of Student Performance and Progress (CAASPP), 14-TC-01
Education Code Sections 60602, 60603, 60604, 60607, 60610, 60611, 60612, 60640,
60641, 60642.6, 60643, 60643.6, 60648, 60648.5, 60649, 60810, 99300, and 99301;
Statutes 2013-2014, Chapter 489 (AB 484); Statutes 2014 Chapter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