RECEIVED
March 13, 2015
Commission on
State Mandates

March 13, 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:

I am the Executive Director of the California Educational Technology Professionals Association (CETPA). In April 2014, CETPA administered a statewide survey of school districts and county offices of education (COEs). A follow-up survey was then administered in September 2014 with similar questions. The intent of these surveys was to ascertain the level of confidence or concern with technology requirements associated with administering the CAASPP.

A number of key findings from these surveys relate to Test Claim 14-TC-01, particularly in light of the comments filed by the Department of Finance.

- **Staffing insufficiency.** The initial survey found that 65% of districts and COEs were uncertain as to whether they had sufficient staff to provide technical support to administer the assessment. The follow-up survey found that this number had declined to 50%.

- **Device insufficiency.** The initial survey found that 33% of districts and COEs were uncertain as to whether the number or quality of devices they had were sufficient to properly administer the assessment. The follow-up survey found that this number had declined to 18%.

- **Network resource insufficiency.** The initial survey found that 33% of districts and COEs were uncertain as to whether the network resources (i.e., network reliability, bandwidth, and wireless capacity) they had were sufficient to properly administer the assessment. The follow-up survey found that this number had declined to 13%.

These numbers supports the same two conclusions in each area. First, districts and COEs hired staff in order to prepare, purchased additional and higher quality devices, and improved their networks to administer the assessment. All of these enhancements required districts and COEs to expend their limited financial resources. Second, as of the beginning of this school year, additional funding was still needed in order for all districts and COEs to have sufficient staffing to provide technical support to administer the assessment, to have a sufficient number and quality of devices to administer the assessment, and to have sufficient network resources to administer the assessment. The latter conclusion is also strongly supported by the survey questions regarding whether current funding is sufficient and whether additional resources are required.

The surveys also found significant disparities in how districts and COEs utilized the $1.25 billion in one-time funding restricted to Common Core implementation. Notably, most districts and COEs spent

more than half of this funding on professional development and instructional materials rather than technology.

Finally, districts and COEs responded that the survey did not capture the extensive staffing and resources required for districts and COEs to be as ready as they were to administer the assessment and the negative impact (financial and otherwise) to other programs as a result.

Attached please find a published summary of the two surveys. The survey data itself is extensive and can be provided upon request.

I declare by my signature below, under penalty of perjury under the laws of the State of California, that the statements made in this document are true and complete to the best of my own personal knowledge or information and belief.

Andrea Bennett
Executive Director
California Educational Technology Professionals Association

California Educational Technology Professionals Association
Andrea Bennett, Executive Director

Review of Statewide K12 Survey Results on Challenges with CAASPP (SBAC) Implementation

CETPA launched a statewide survey of K12 districts and county offices of education in April, 2014, intending to ascertain the level of confidence or concern with technology requirements associated with completing the CAASPP Field Test. Some LEAs were in their testing windows, and others were about to start.

Results of the survey will be made publically available on CETPA's web site at: **http://cetpa.net.** CETPA shares the following Executive Review of key findings of this survey. **See the last page of these materials for contact information for additional data details or further assistance**.

Survey Specifics:

- Survey Respondents:
  - **402 districts and county offices of education** responded to the survey, representing about a 33% sample rate.
  - Respondents were well distributed and were disaggregated by size of district, type of district (elementary, unified, etc.) and by county.
  - **LEAs were asked about their level of confidence vs. concern in four main categories**:
    - **Hardware** (number and sufficiency of devices to take the test)
    - **Network / Infrastructure** (sufficiency of bandwidth, access, reliability)
    - **Environment / Time** (sufficient and appropriate spaces to take test, time available)
    - **Technical / Professional Development** (sufficient staff, training for instructional and technical staff
  - Additional questions were added about the LEAs perception of:
    - **The sufficiency of the one-time funding** to meet these challenges
    - The percent (if they knew) of the one-time **funding spent on technology** at their LEA
    - The **impact of the migration** to online assessments on their staff and other resources
    - Their **perception of the need for ongoing funding for technology and support,** in light of the increased demands from Common Core implementation, CAASPP, etc.

Key Findings:

- Though a significant number of LEAs expressed confidence (45% Fairly Confident, 22% Certain) in the sufficiency of their **number and quality of devices** needed to give the test, that still left **33% who still had a level of uncertainty in this area** (if the sample is sufficient, north of 400 LEAs potentially in this category statewide). See **Chart 1** attached, grouping the questions related to hardware.

- Those same numbers are reflected again in the LEAs **confidence in the capacity of their network resources** (33% still at some level of uncertainty). Higher levels of concern appeared when asked specifically about wireless network resources (37%), for those districts relying on that to deliver the test. See Chart 2 attached, grouping the questions related to networks.

- Greater levels of uncertainty appear in questions around Facilities, with 50% of LEAs expressing some uncertainty as to the sufficiency of the number of rooms and physical workspaces available to take the test. A smaller number (25% of respondents) expressed concerns about having sufficient power available for the equipment needed, but again, the number of agencies this represents highlights an area of concern. See Chart 3 attached, grouping the questions related to Facilities.

- **The largest levels of uncertainty and concern centered around the questions on staffing**. Having a sufficient quantity of staff to provide technical support, and having sufficient training for instructional, support staff and assessment technicians, **concerned fully 65% of respondents**. See Chart 4 attached, grouping the questions related to Staffing.

- Somewhat counter-intuitively, overall confidence was **lower with the largest districts** (those over 50,000) than the average statewide. Further research would be needed, but anecdotal information suggests the largest districts simply have more complexity in tackling these challenges on a larger scale spread out over many school sites.

- Extremely strong responses are seen to the perceived need for **additional funding to meet these challenges.** When asked about the **whether the one-time funding was sufficient to meet the technology needs of CAASPP, 54% of LEAs said no.** When asked about the need for technology-specific funding to meet the challenges of **Common Core and 21st Century learning, in addition to CAASPP, 93% of respondents said there was a need for a moderate to significantly higher investment to meet that future.**

Additional Considerations:

- Though the survey had an excellent return rate and a good distribution of types of LEAs, it is highly likely that given the number of small districts in California (733 under 5,000 students), and given the lack of time and people resources at those sites, that group, which has many of the most significant challenges of connectivity and sufficiency of staff, is likely under-represented here (173 respondents, or 23% of this demographic).

- There was a significant spread in how one-time funding got distributed at LEAs. Common Core adoption funding is needed for technology, professional development and learning resources,

each of which could easily consume all the one-time funding. Depending on circumstances at each LEA, little or none of that funding was allocated to technology, in deference to these other needs, further exacerbating the issues.

- Districts shared that, though they may have responded with confidence on several of these points, the survey did not capture the extreme effort it took for them to get to that point in the last two years, and the sacrifices made to other programs as a result. Network bandwidth was sufficient because access to the bandwidth was severely restricted for testing purposes, impacting business operations and other instructional programs. Bandwidth demands will increase as test expands.

- Districts reporting significant difficulties with getting support from ETS.

Additional Work Needed:

- Given the challenges with capacity for LEAs just focusing on delivery of the CAASPP Field Test, clearly the exponentially larger challenges of ensuring technological resources sufficient for successful Common Core Standards migration across the state (and all the technology integrated therein) will require even more focused planning.

- Significant additional data is needed to determine the implications of the need for future funding appropriate to meeting the goals the state has already identified (CAASPP delivery for all future testing, and full implementation of all Common Core standards). Lack of resources is raising concerns about sustainability of these efforts to date.

- The final data results showing how many LEAs successfully submitted CAASPP Spring Field Test results are pending. It will be critically important to gather good "post-mortem" data to determine the reasons why any given district was unable to successfully submit results because, as this survey suggests, there are several dozen potential factors that account for the inability to successfully submit results.

Policy Recommendations:

1. **Provide Additional One-Time Funds for Common Core Implementation with a Focus on Technology Needs -** The survey results demonstrate that schools continue to have needs in the area of education technology to prepare the state's schools for a smooth implementation of the SBAC assessments in 2015. We encourage the state to consider a carve-out of any potential additional one-time Common Core funds specifically targeted at education technology in order better ensure readiness.

2. **On-going Resources Needed to Sustain Education Technology Needs** - The survey results clearly show the greatest statewide concern is the sustainability of costs associated with the growing technology demands within the K-12 education system. While the one-time Common Core funds ($1.25 billion provided in 2013-14 and 2014-15) are helpful in the short term, they do not resolve the on-going demands associated with adequate staffing, staff training, equipment replacement, software

purchase/licensing updating, broadband maintenance, and appropriate facilities - just to name a few. Too often the conversations regarding technology-readiness in schools focus on the "devices" without a fair consideration of the critically important role of staffing, maintenance, software, and planning that must take place in order to make those devices work as intended.

We are particularly concerned that while LCFF provides additional funding over the implementation period (next 7-10 years), 1) those resources do not go to all schools, and 2) the bulk of the additional resources are directed at meeting the needs of EL, poor, and foster youth students. Additionally, LEAs must use LCFF funds to address pent up demand for staff raises, back-to-back instructional materials purchases in math, English Language Arts, Science, and likely History Social Science. At the same time, the state has agreed to implement the SBAC assessments beginning in 2015, but so far has not assessed the on-going statewide costs associated with the extensive expansion of technology requirements on local schools. These costs should be determined and adequately funded by the state. CETPA stands ready to assist in this effort.

3. **LAO Study On-Going Costs related Technology** - We believe it would be appropriate for the Legislative Analyst's Office to work with local educational agencies and stakeholders (like CETPA) to analyze the account for the on-going technology-related costs associated with the requirements of current federal and state law. We know these costs vary by district type, size, geography, and we would like to assist the state in collecting additional data related to this effort.

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Technology Professionals

Director

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Chart 1 – Combined Questions on Hardware, Secure Browser

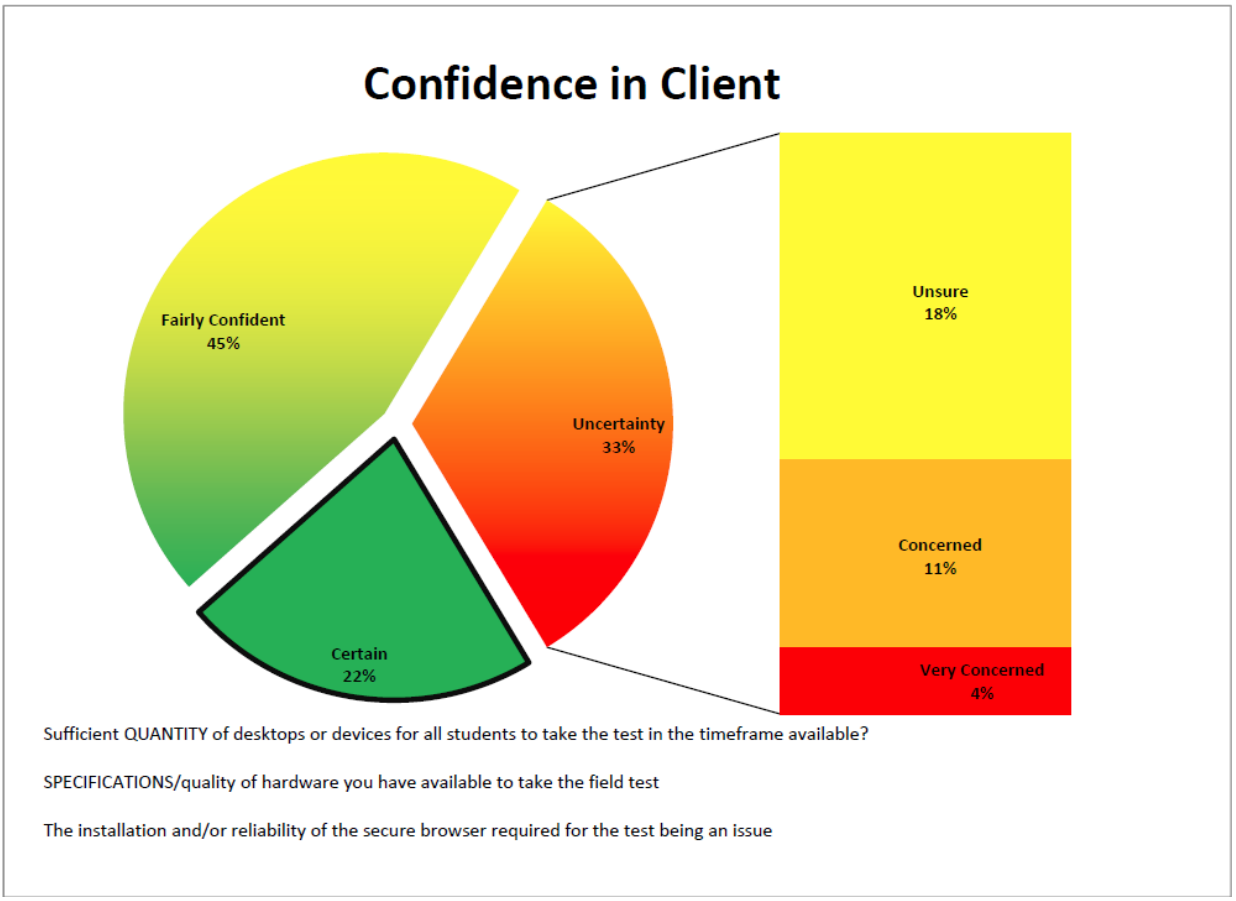


Chart 2 – Combined Questions on Network Reliability, Bandwidth, Wireless

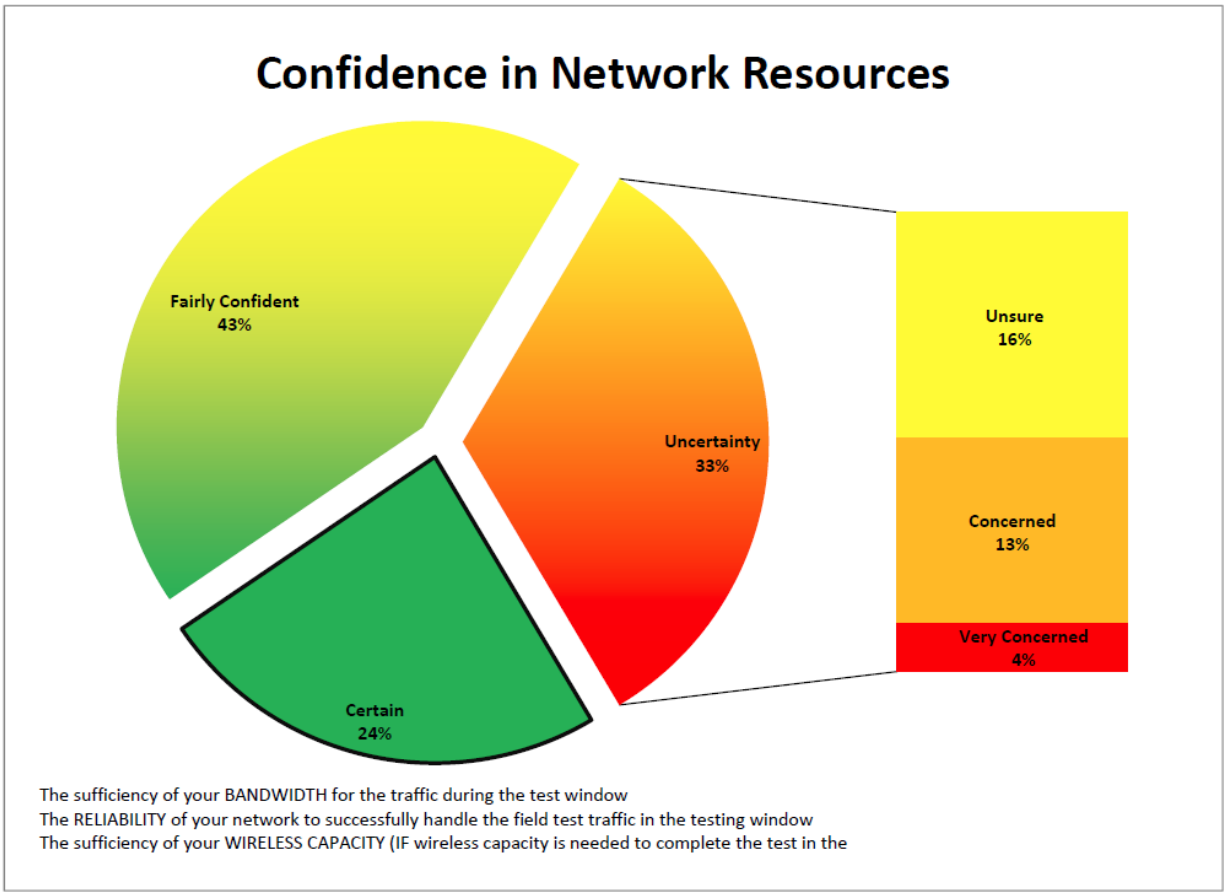


Chart 3 – Combined Questions on Sufficiency of Power, Rooms, Testing Workspace

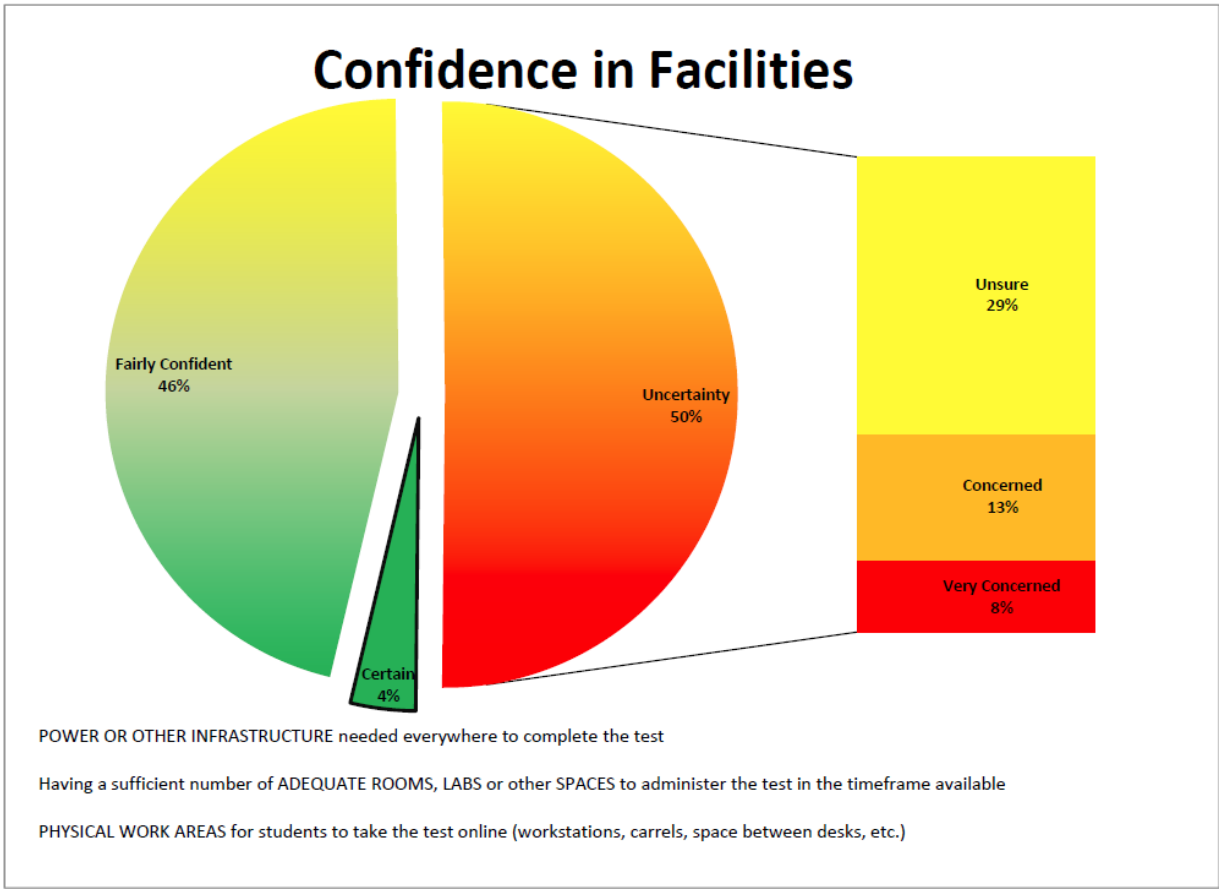
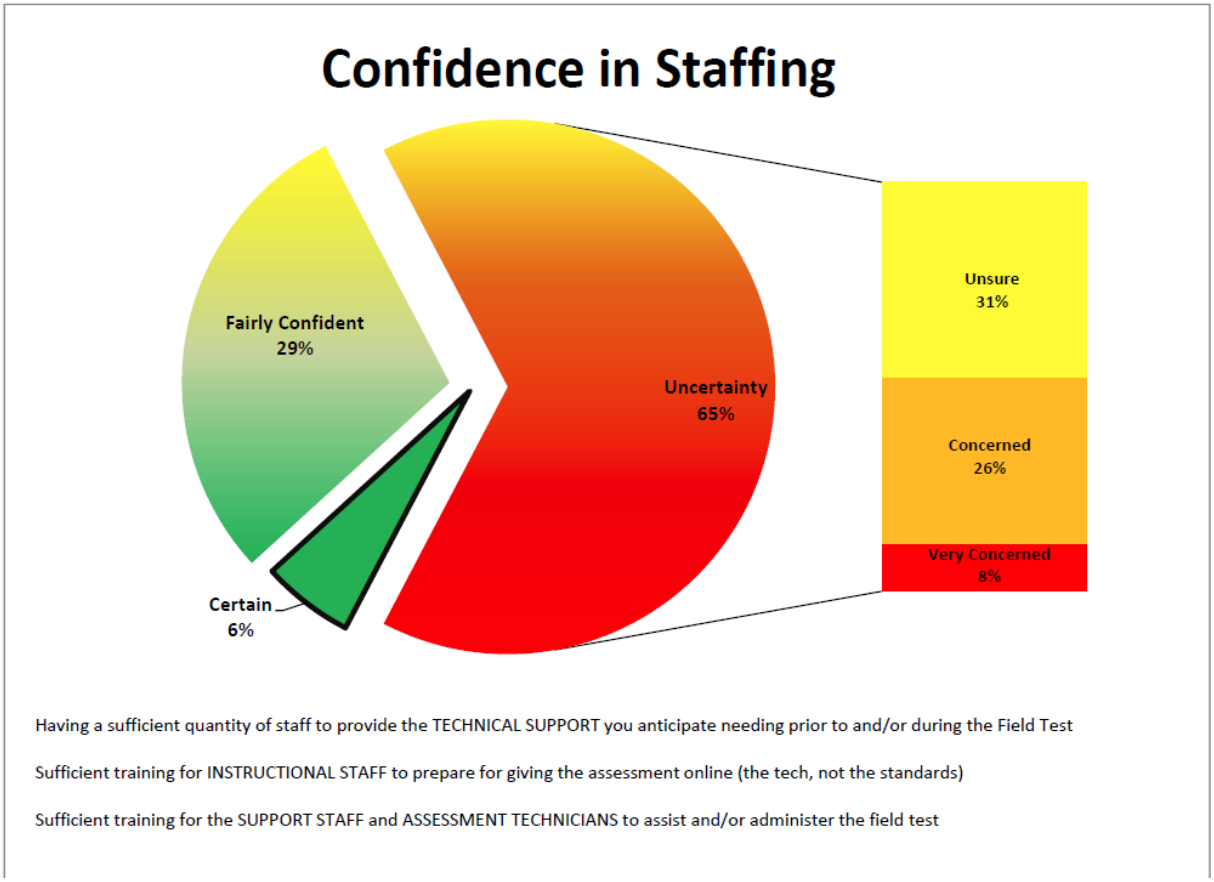


Chart 4 –Combined Questions on Staffing, Training for Instructional and Support Staff



California Educational Technology Professionals Association
Andrea Bennett, Executive Director

Review of Results: Second Statewide K12 Survey on Challenges Post-CAASPP (SBAC) Implementation

CETPA launched a second statewide survey of K12 districts and county offices of education in the summer of 2014, intending to ascertain to follow up and determine levels of success or concern following the initial pilot of the CAASPP Field Test.

Results of the survey are publically available on CETPA's web site at: **http://cetpa.net.** CETPA shares the following Executive Review of key findings of this survey. **See the last page of these materials for contact information for additional data details or further assistance**.

Survey Specifics:

- Survey Respondents:
  - **267 districts and county offices of education** responded to the survey, representing about a 25% sample rate (slightly smaller than the pre-test survey).
  - Respondents were well distributed and were disaggregated by size of district, type of district (elementary, unified, etc.) and by county.
  - **LEAs were asked questions about the sufficiency or adequacy of their technologies and other factors relating to CAASPP delivery in four main categories**:
    - **Hardware** (number and sufficiency of devices to take the test)
    - **Network / Infrastructure** (sufficiency of bandwidth, access, reliability)
    - **Environment / Time** (sufficient and appropriate spaces to take test, time available)
    - **Technical / Professional Development** (sufficient staff, training for instructional and technical staff
  - Additional questions were re-asked or added about the LEAs perception after the pilot of:
    - **The sufficiency of the one-time funding** to meet these challenges
    - The percent (if they knew) of the one-time **funding spent on technology** at their LEA
    - The **impact of the migration** to online assessments on their staff and other resources
    - Their **perception of the need for ongoing funding for technology and support,** in light of the increased demands from Common Core implementation, CAASPP, etc.

Key Findings:

- Though a significant number of LEAs (almost 82% of respondents) felt they had a sufficient **number and quality of devices** needed to give the test, that still left approximate 18**% who remained unsure or did not have a sufficient quantity.** This is significant in that, if the sample is sufficient, potentially 173 (using 1,058 as the state total) districts or COEs are potentially in this category statewide.

- Similar numbers are reflected again in the LEAs' **network resources** (87% had sufficient bandwidth to complete the test, though it is unclear if sacrifices to other network traffic were needed to achieve this). The 13% unsure or without sufficient bandwidth would translate to potentially 141 affected LEAs. As with the last survey, higher levels of concern appeared when asked specifically about **wireless network resources** (only 62% reporting sufficient).

- Greater levels of uncertainty appear in questions around **Facilities**, with 27% of LEAs expressing issues with the number of rooms and physical workspaces available to take the test. A smaller number (11% of respondents) expressed concerns about having sufficient power available for the equipment needed, but again, the number of agencies this potentially represents highlights an area of concern.

- **Time** is an area that popped up as a larger concern post-survey than before. Almost 30% of LEAs reported not having enough time, or not being sure if time was an issue in completing the assessment successfully in the time allowed. Additionally, almost 40% of respondents also reported issues with challenges around the **distribution of IDs and logging in of students,** a more significant concern than expressed pre-survey.

- **The largest levels of uncertainty and concern remained around the questions on staffing**. Having a sufficient quantity of staff to provide technical support, and having sufficient training for instructional, support staff and assessment technicians, **concerned approximately 50% of respondents,** with the highest concerns around quantity of technical staff and sufficient instructional training. These also were the highest levels of concern for next year's ("real") assessment.

- Overall confidence continued **lower with the largest districts** (those over 25,000) than the average statewide. Only 11% of districts with more than 25,000 ADA reported that they were "Certain" they were ready to deliver the CAASP. Further research would be needed, but anecdotal information suggests the largest districts simply have more complexity in tackling these challenges on a larger scale spread out over many school sites.

- Some 61% of respondents reported good to excellent service support from ETS (17% did not use the service).

- On the good news side, over 96% of respondents would "grade" their experience in participating in the field test as "Good" or "Excellent." However, some comments indicate district IT leadership may not have been aware of the actual completion rates of the assessment, and that may not have been a factor in rating "how we did."

- Extremely strong responses are seen to the perceived need for **additional funding to meet these challenges.** When asked about the **whether the one-time funding was sufficient to meet the technology needs of CAASPP, 51% of LEAs said no.** And now, post-pilot, when asked about the need for technology-specific funding to meet the challenges of **Common Core and 21st Century learning, in addition to CAASPP, 96% of respondents said there was a need for a moderate to significantly higher investment to meet that future.**

Additional Considerations:

- As with the last survey, though it had an excellent return rate and a good distribution of types of LEAs, it is highly likely that given the number of small districts in California (733 under 5,000 students), and given the lack of time and people resources at those sites, that group, which has many of the most significant challenges of connectivity and sufficiency of staff, is likely under-represented here (120 respondents, or 16% of this demographic, slightly smaller than the pre-survey).

- There was a significant spread in how one-time funding got distributed at LEAs. Common Core adoption funding is needed for technology, professional development and learning resources, each of which could easily consume all the one-time funding. Depending on circumstances at each LEA, in some cases, little or none of that funding was allocated to technology, in deference to these other needs, further exacerbating the issues. (In fact, several technology leaders appeared unaware that funding could be used for this purpose.)

- Districts again shared that, though they may have responded with success on several of these points, the survey did not capture the extreme effort it took for them to get to that point, and the sacrifices made to other programs as a result. They further expressed concern that though they made it work for this pilot, bandwidth demands will increase as test expands.

Additional Work Still Needed:

- Given the challenges with capacity for LEAs just focusing on delivery of the CAASPP Field Test, clearly the exponentially larger challenges of ensuring technological resources sufficient for successful Common Core Standards migration across the state (and all the technology integrated therein) will require even more focused planning.

- Significant additional data is needed to determine the implications of the need for future funding appropriate to meeting the goals the state has already identified (CAASPP delivery for all future testing, and full implementation of all Common Core standards). Lack of resources is raising concerns about sustainability of these efforts to date.

Policy Recommendations:

1. **Provide Additional One-Time Funds for Common Core Implementation with a Focus on Technology Needs -** The survey results demonstrate that schools continue to have needs in the area of education technology to prepare the state's schools for a smooth implementation of the SBAC

assessments in 2015. We encourage the state to consider a carve-out of any potential additional one-time Common Core funds specifically targeted at education technology in order better ensure readiness.

2. **On-going Resources Needed to Sustain Education Technology Needs** - The survey results clearly show the greatest statewide concern is the sustainability of costs associated with the growing technology demands within the K-12 education system. While the one-time Common Core funds (which are unclear for the near future) are helpful in the short term, they do not resolve the on-going demands associated with adequate staffing, staff training, equipment replacement, software purchase/licensing updating, broadband maintenance, and appropriate facilities - just to name a few. Too often the conversations regarding technology-readiness in schools focus on the "devices" without a fair consideration of the critically important role of staffing, maintenance, software, and planning that must take place in order to make those devices work as intended.

   We are particularly concerned that while LCFF provides 'additional funding' over the implementation period (next 7-10 years), 1) those resources do not go to all schools, and 2) the bulk of the additional resources are directed at meeting the needs of EL, poor, and foster youth students. Additionally, LEAs must use LCFF funds to address pent-up demand for staff raises, back-to-back instructional materials purchases in math, English Language Arts, Science, and likely History Social Science. At the same time, the state has agreed to implement the SBAC assessments beginning in 2015, but so far has not assessed the on-going statewide costs associated with the extensive expansion of technology requirements on local schools. These costs should be determined and adequately funded by the state. CETPA stands ready to assist in this effort.

3. **LAO Study On-Going Costs related Technology** - We believe it would be appropriate for the Legislative Analyst's Office to work with local educational agencies and stakeholders (like CETPA) to analyze the account for the on-going technology-related costs associated with the requirements of current federal and state law. We know these costs vary by district type, size, geography, and we would like to assist the state in collecting additional data related to this effort.

California Educational Association
Andrea Bennett, Executive

Technology Professionals

Director

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DECLARATION OF SERVICE BY EMAIL

I, the undersigned, declare as follows:

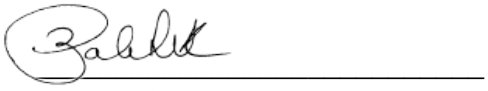
I am a resident of the County of Solano and I am over the age of 18 years, and not a party to the within action. My place of employment is 980 Ninth Street, Suite 300, Sacramento, California 95814.

On March 16, 2015, I served the:

> **Claimant Rebuttal Comments** and **California Educational Technology Professionals Association 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)
>
> 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 16, 2015 at Sacramento, California.



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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 3/13/15

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
Vallejo City 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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