



April 27, 2015

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Commission on  
State Mandates

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

**LATE FILING**

**Re: California Assessment of Student Performance and Progress (CAASPP)  
Test Claim 14-TC-01**

Dear Ms. Halsey:

The Department of Finance has reviewed the claimants' March 13, 2015 comments and respectfully submits the following comments in support of our assertion that the claim is not a reimbursable state mandate.

**K-12 High Speed Network Funding**

The claimants assert that the \$26.7 million included in the 2014 Budget Act for network connectivity infrastructure grants is not offsetting revenue "...because districts and county offices of education do not actually receive these funds directly; they only receive the benefit. Thus a district or county office of education would never incur actual costs that would be reimbursed by this funding source."

To administer the allocation of the \$26.7 million, the State Department of Education and the K-12 High Speed Network (K12 HSN) accepted applications from districts and county offices of education that identify lack of adequate internet connectivity as a barrier to administering the CAASPP. After selecting grant recipients, the state chose to manage the project procurement process and the K12 HSN secured contracts on behalf of the eligible districts. This approach resulted in project costs that were lower than what an individual district or county office of education would have paid. This program also pays ongoing monthly internet service costs on behalf of grant recipients through June 30, 2016.

Had the \$26.7 million not been available, grant recipients that identified lack of adequate internet connectivity as a barrier to administering the CAASPP would have incurred costs to enter into the private market to procure increased broadband services.

**Additional Funding Sources**

The claimants assert that the \$22.7 million from Provision 6 of Item 6110-113-0890 of the 2014 Budget Act is not offsetting revenue because "...California received a waiver under the No Child Left Behind Act (NCLB) of the requirement to administer an assessment in 2013-14 and 2014-15."

The waiver granted by the federal government for 2013-14 *does not* exempt California from the requirement to administer assessments as a condition of meeting NCLB. Specifically, the

waiver for 2013-14 was contingent on California local education agencies ensuring that, with the exception of students with the most significant cognitive disabilities, all students in grades 3 through 8 participated in the Smarter Balanced Assessment Consortium (SBAC) field test in English language arts/literacy and mathematics. It should be noted that the SBAC tests are one of the components contained within the CAASPP System. The waiver was sought to prevent: (1) "double-testing" of students by allowing schools to meet the assessment requirements in section 1111(b)(3) of NCLB by administering only one reading/language arts assessment and one mathematics assessment in 2013-14 to any individual student, and (2) mandatory reports of student performance on the field test. For 2014-15, California has requested to extend this waiver by one year.

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