



February 13, 2015

RECEIVED
February 13, 2015
*Commission on
State Mandates*

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

Dear Ms. Halsey:

As requested in your Notice of Complete Test Claim Filing and Schedule for Comments for the California Assessment of Student Performance and Progress (CAASPP) Test Claim (14-TC-01) related to reimbursable state mandated costs submitted by the Santa Ana Unified, Porterville Unified, Plumas Unified School Districts, and the Plumas County Office of Education (Claimants), the Department of Finance (Finance) has reviewed the test claim and respectfully asserts that the claim is not a reimbursable state mandate for the following reasons:

- A. The No Child Left Behind Act (NCLB) is a federal mandate; therefore administering the CAASPP System is not a state mandate because it is required to ensure California's compliance with NCLB.
- B. The CAASPP System replaced the Standardized Testing and Reporting (STAR) Program. The Commission has previously denied similar claims relating to the administration of the STAR Program, concluding that the test claim statutes and regulations did not impose a reimbursable state-mandated program on school districts because the state has appropriated state and federal funds sufficient to pay for the costs of the claimed activities that were beyond those activities necessary to implement the testing requirements of federal law.

Background

The State Board of Education (SBE) adopted common core state standards in English language arts and mathematics on August 2, 2010, creating a need to replace STAR with the CAASPP System, which is aligned to the standards. In June 2011, California joined the Smarter Balanced Assessment Consortium (SBAC) to develop assessments aligned to the common core standards that will be operational in Spring 2015. Unlike the STAR tests, the SBAC assessments are computer-adaptive. However, Chapter 489, Statutes of 2013 (AB 484) authorizes schools to administer any computer-based CAASPP assessments on paper for up to three years after a new operational test is first administered.

NCLB is a Federal mandate, and therefore, CAASPP is not a state mandate

Regarding activities associated with administering the CAASPP System, we reiterate comments previously submitted as part of the proceedings for the STAR test claim (Case No.

04-RL-9723-01), in which Finance, the California Department of Education, and the Legislative Analyst's Office concluded that NCLB is a federal mandate, and therefore the STAR program could not be found to be a state mandate because it is required to comply with NCLB. We support a similar conclusion for the CAASPP System based on the following significant points:

1. Chapter 489, Statutes of 2013 repealed STAR and replaced it with the CAASPP System; therefore, CAASPP should not be considered a new program. Prior to NCLB, the federal Title I program provisions under the Improving America's Schools Act (IASA) of 1994 required statewide systems of assessment and accountability for schools and districts receiving Title I funds. Assessment requirements contained in the IASA included: (1) the testing of all students in each of three grade spans (grades 3 through 5, 6 through 9, and 10 through 12); (2) the provision of reasonable adaptations and accommodations for students with special learning needs; and (3) the provision of individual student assessment results to parents.

The NCLB replaced the IASA in 2002, and required states to develop a system of assessments that meet specific criteria. Pursuant to Section 1111 of NCLB, each state is required to implement a single, statewide accountability system based on academic standards and academic assessments to assess the yearly progress of "all public elementary and secondary school students." NCLB also specifically requires annual testing in mathematics and reading in grades 3 through 8 and once in grades 9 through 12. States also must begin to assess students specifically in science beginning in 2007-08. Without such a system, a state would jeopardize the receipt of federal NCLB funds.

We therefore assert CAASPP is a federal mandate, as defined in Government Code Section 17513 ("...where failure to enact that law or regulation to meet specific federal program or service requirements imposed upon the state would result in substantial monetary penalties or loss of funds to public or private persons in the state whether the federal law was enacted before or after the enactment of the state law, regulation, or executive order") and subsection (c) of Government Code Section 17556 ("The statute or executive order imposes a requirement that is mandated by a federal law or regulation and results in costs mandated by the federal government, unless the statute or executive order mandates costs that exceed the mandate in that federal law or regulation. This subdivision applies regardless of whether the federal law or regulation was enacted or adopted prior to or after the date on which the state statute or executive order was enacted or issued").

2. Federal Title I and VI funds are provided for purposes of the CAASPP System. Under Title I NCLB, "Improving the Academic Achievement of the Disadvantaged", Section 1111(a)(1) provides the following: *"For any State desiring to receive a grant (Title I) under this part, the State education agency shall submit to the Secretary a plan, developed by the State educational agency, in consultation with local educational agencies, teachers, principals, pupil services personnel, administrators (including administrators of programs described in other parts of this title), other staff, and parents, that satisfies the requirements of this section..."* This section includes a provision (1111(b)(2)(A)) that requires states to establish a single statewide assessment and accountability system for all public school students. In addition, Section 1111(b)(2)(A)(i) requires that each state accountability system "be based on academic standards and academic assessments." Further, Section 1111(b)(2)(B) requires each state to

demonstrate what constitutes adequate yearly progress of the State, and of all public elementary schools, secondary schools, and local educational agencies in the State, based on those academic assessments. Finally, Section 1002(a) provides appropriations to local educational agencies for the purpose of carrying out Part A of Title I, which covers the aforementioned sections and requirements *and does not allow their expenditure for any other purpose*. Therefore, Title I funds are clearly provided for school districts for the CAASPP System, which is the central element of the State's assessment and accountability system used to satisfy the federal requirements under NCLB. Without the program, the State would not be in compliance with federal law and would jeopardize its receipt of federal Title I funds.

Under Title VI of NCLB, titled "Flexibility and Accountability", Section 6111 provides that the grants be available for states to enable them to "pay the costs of the development of the additional State assessments and standards required by section 1111(b)", which is referenced above under Title I. Section 6111 also provides that the grants be available, "...if a State has developed the assessments and standards required by section 1111(b), to administer those assessments or to carry out other activities described in this subpart and other activities related to ensuring that the State's schools and local educational agencies are held accountable for results." Similar to that of Title I, school districts clearly are provided federal Title VI funds for the CAASPP System.

Should the Commission disagree with our belief that CAASPP is a federal mandate, the following items and provisions of the 2014 Budget Act explicitly require the offset of state-mandated reimbursable costs for the CAASPP System (Chapter 489 of the Statutes of 2013):

Provision 7 of Item 6110-113-0001, which contains the \$126.8 million General Fund local assistance appropriation for state assessments, reads:

"7. Funds provided to local educational agencies from Schedules (2), (3), (4), (5), (6), (7), and (8) shall first be used to offset any state-mandated reimbursable costs within the meaning of Section 17556 of the Government Code, that otherwise may be claimed through the state mandates reimbursement process for the remaining costs of the STAR 2013-14 test administration, the California English Language Development Test, the California High School Exit Examination, and the statewide pupil assessment system established pursuant to **Chapter 489 of the Statutes of 2013**. Local educational agencies receiving funding from these schedules shall reduce their estimated and actual mandate reimbursement claims by the amount of funding provided to them from these schedules."

Provision 6 of Item 6110-113-0890, which contains the \$22.7 million Federal Trust Fund local assistance appropriations for Title VI monies, reads:

"6. Funds provided to local educational agencies from Schedules (2), (3), and (5) shall first be used to offset any state-mandated reimbursable cost, within the meaning of subdivision (e) of Section 17556 of the Government Code, that otherwise may be claimed through the state mandates reimbursement process for the statewide pupil assessment system established pursuant to **Chapter 489 of the Statutes of 2013**, the California English Language Development Test, the California High School Exit Exam, and the California Alternate Performance Assessment. Local educational agencies

receiving funding from these schedules shall reduce their estimated and actual mandate reimbursement claims by the amount of funding provided to them from these schedules.”

These appropriations provide sufficient funds to specifically cover the costs of the CAASPP System and should result in no costs mandated by the state pursuant to Government Code section 17556(e).

The Commission has previously denied claims with similar activities (05-TC-02, 05-TC-03, and 08-TC-06) on the basis that STAR did not impose a reimbursable state-mandated program on school districts

The CAASPP System replaced the STAR Program, which required school districts, between March 15 and May 15 each year, to test all students in grades 2 through 11 with a nationally normed achievement test designated by the State Board of Education.

On December 6, 2013, the Commission adopted a statement of decision to deny the STAR program test claims that sought reimbursement for activities that were similar to those being claimed here for the CAASPP System. The Commission found that the test claim statutes and regulations did not impose a reimbursable state-mandated program, stating “...the state has appropriated state and federal funds sufficient to pay for the costs of the new required activities. This funding, by law, ‘shall first be used’ to offset costs that may be claimed through the state mandates reimbursement process for the STAR program and there is no evidence in the record of increased costs mandated by the state beyond the funding appropriated to school districts. Thus, there are no costs mandated by the state pursuant to Government Code section 17556(e).” We respectfully urge the Commission to make a similar determination in this case.

The following activities were previously denied by the Commission relating to STAR Program and are now being cited as new activities and costs relating to the CAASPP System:

- Review the requirements in statute and regulations regarding CAASPP.
- Train and hire administrators, teachers, and other school district personnel on the requirements and administration relating to the CAASPP program, including test administration and reporting requirements, and training.
- Administer the tests for the CAASPP program, including determining school district and test site test and materials needs; purchasing testing materials; collecting CAASPP Test Security Agreements from every person who has access to tests; maintaining security over test materials and test data; submitting pupil demographic information; staff time of teachers, classroom aides, exam proctors and other school district personnel in administering the tests to pupils.
- Maintain individual records of the tests in pupil records.
- Report the individual results of the CAASPP Program tests to the pupils' parents or guardians, to the pupils' schools, and the pupils' teachers, including preparation and mailing of reports.
- Report the results of the CAASPP Program tests and the tests to the school district governing board on a districtwide and school-by school basis.

- Submit whatever information the State Department of Education deems necessary to permit the State Superintendent of Public Instruction to prepare reports on the CAASPP Program.
- Process requests for exemption from testing filed by parents and guardians.
- Review the IEPs of children with disabilities to determine if the IEPs contain an express exemption from testing. Determine the appropriate grade level test for special education pupils and to provide appropriate testing adaptations and accommodations for these pupils.

We argue that legislation and regulations governing the implementation of the CAASPP System have not imposed a new program or higher level of service on school districts because the law in effect prior to the enactment of the test claim legislation required the administration of achievement tests.

Offsetting Funds

If the Commission, despite our strong arguments above, finds that the activities and costs included in this test claim are reimbursable, we argue that in addition to the funding sources mentioned above, the following funding sources should be considered offsetting.

The 2013 Budget Act appropriated \$1.25 billion in common core state standards implementation funds to help with teacher training, instructional materials, and technology upgrades. As previously mentioned, the CAASPP System replaced STAR as California's assessment system aligned to the new standards. The 2013 Budget Act appropriation included expenditures necessary to support the administration of computer-based assessments and provide high-speed, high-bandwidth Internet connectivity for the purpose of administration of computer-based assessments. Specifically, Chapter 48 of the Statutes of 2013 specifies in part:

"SEC. 85. (a) (1) The sum of one billion two hundred fifty million dollars (\$1,250,000,000) is hereby appropriated from the General Fund to the Superintendent of Public Instruction for transfer to Section A of the State School Fund...

(2) It is the intent of the Legislature that school districts, county offices of education, charter schools, and the state special schools use funds...to support the integration of academic content standards in instruction adopted...for purposes of establishing high-quality instructional programs for all pupils...

(d) A school district, county office of education, charter school, or state special school shall expend funds allocated pursuant to this section for any of the following purposes:

(1) Professional development for teachers, administrators, and paraprofessional educators or other classified employees involved in the direct instruction of pupils that is aligned to the academic content standards adopted pursuant to Sections 60605.8, 60605.11, 60605.85, and 60811.3 of the Education Code.

(2) Instructional materials aligned to the academic content standards adopted pursuant to Sections 60605.8, 60605.85, 60605.11, and 60811.3 of the Education Code, including, but not limited to, supplemental instructional materials as provided in Sections 60605.86, 60605.87, and 60605.88 of the Education Code.

(3) Integration of these academic content standards through technology-based instruction for purposes of improving the academic performance of pupils, including, but not necessarily limited to, expenditures necessary to support the

administration of computer-based assessments and provide high-speed, high-bandwidth Internet connectivity for the purpose of administration of computer-based assessments.

The 2014 Budget Act provided approximately \$400.5 million in one-time funds for outstanding mandate claims, however, after satisfying any outstanding mandate claims the funds could be used for any one-time purpose determined by a local educational agency's (LEA's) governing board, including technology infrastructure. This total amount of funding is found in Chapter 32 of the Statutes of 2014 and the 2014 Budget Act.

Specifically, Chapter 32 of the Statutes of 2014 specifies:

“SEC. 52. 17581.8. (a) (1) The sum of two hundred eighty-seven million one hundred forty-nine thousand dollars (\$287,149,000) is hereby appropriated from the General Fund to the Superintendent of Public Instruction for allocation to school districts in the manner, and for the purposes, set forth in this section...

(b) (1) The Superintendent of Public Instruction shall allocate the funds appropriated pursuant to paragraph (1) of subdivision (a), and the funds appropriated for purposes of this section pursuant to Item 6110-488 of the Budget Act of 2014, to school districts on the basis of an equal amount per unit of regular average daily attendance, as those numbers are reported at the time of the second principal apportionment for the 2013–14 fiscal year.

(c) Allocations made pursuant to this section shall first satisfy any outstanding claims pursuant to Section 6 of Article XIII B of the California Constitution for reimbursement of state-mandated local program costs for any fiscal year...

(d) (1) The governing board of a school district or community college district may expend funds received pursuant to this section for any one-time purpose, as determined by the governing board.

(2) It is the intent of the Legislature that school districts will prioritize the use of these one-time funds for professional development, instructional materials, **technology infrastructure**, and any other investments necessary to support implementation of the common core standards in English language arts and mathematics, the implementation of English language development standards, and the implementation of the Next Generation Science standards.”

Provision 7 of Item 6110-488 of the 2014 Budget Act specifies:

“The sum of \$113,351,000 is hereby reappropriated to the State Department of Education for transfer by the Controller to Section A of the State School Fund for allocation by the Superintendent of Public Instruction to school districts, county offices of education, and charter schools in proportion to their average daily attendance reported as of the second principal apportionment for the 2013–14 fiscal year, **for the purposes specified in subdivisions (c) and (d) of Section 17581.8 of the Government Code**, and in augmentation of the funds provided in subdivision (a) of Section 17581.8 of the Government Code.”

Additionally, the 2014 Budget Act included \$26.7 million to address broadband infrastructure needs. These funds are intended to help schools enhance their network connectivity so that they can successfully administer computer-based assessments. Specifically, Provision 2 of Item 6110-182-0001 of the 2014 Budget Act specifies:

“2. ...\$26,689,000 is reappropriated with one-time Proposition 98 General Fund savings in Provision 6 of Item 6110-488 to support **network connectivity infrastructure grants** and completion of a statewide report of network connectivity infrastructure by the K–12 High-Speed Network in consultation with the Department of Education and State Board of Education.”

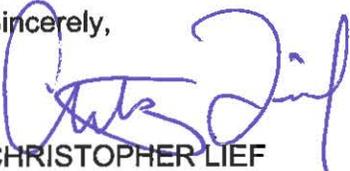
Technology Costs

Apart from utilizing technology for assessment purposes, schools are naturally compelled to invest in technology to adapt instructional delivery and student learning for the 21st century. We believe the claimants have the burden to show that any costs cited under this test claim were incurred solely to accommodate the CAASPP System, and not in part for other education or instructional purposes. Specifically, the claimants are seeking reimbursement for purchasing student devices, software, testing furniture, bandwidth improvements, and computer and tablet accessories, such as ear buds, mice, and keyboards. The claimants are also seeking reimbursement for staff training on the operation of the new devices purchased. If the claimants cannot clearly demonstrate that the items purchased are being used solely for the CAASPP System, and do not exceed the minimum technological needs therein after making all other reasonable accommodations, we believe that the costs should not be reimbursable. Further, we argue that technology training should be considered part of the ongoing professional development already provided to staff and should not be reimbursable.

We also note that Chapter 489, Statutes of 2013 authorizes schools to administer any computer-based CAASPP assessments on paper for up to three years after a new operational test is first administered. As a result, schools are not required to use a computer to administer the CAASPP System until the 2016-17 school year. We argue that any costs incurred before the 2016-17 school year should not be reimbursable because the claimants could have accommodated the CAASPP System through the accommodations provided through statute.

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,



CHRISTOPHER LIEF
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.

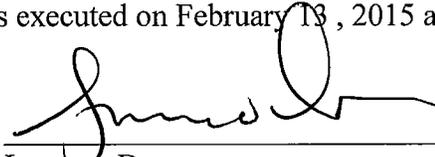
On February 13, 2015, I served the:

DOF 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 13, 2015 at Sacramento, California.



Lorenzo Duran
Commission on State Mandates
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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 2/13/15

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

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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