



**Education Data Advisory Committee (EDAC)  
2007-08 Annual Report to the State Board of Education and the  
Education Committees of the Senate and House of Representatives**

*July 1, 2007 - June 30, 2008*

**EDAC Summary**

The Education Data Advisory Committee (EDAC) is a statewide representative group of school district volunteers which reviews all Colorado Department of Education (CDE) PK-12 data collections including grant applications, surveys, plans, reports, assessments, evaluations and automated data exchange systems. EDAC determines whether the benefits derived from a data collection outweigh the administrative burden of producing the data; determines and recommends the most efficient ways of collecting data; determines if recommendations for new data collections are redundant and proposes alternatives; and reviews department-proposed data collection procedures and recommends improvements. Each EDAC-approved CDE data collection is given a stamp which informs districts and BOCES whether the form is mandatory, required to obtain benefit or voluntary. CDE forms without an EDAC stamp are not required to be completed.

In 2007-08, EDAC formally met six times, conducted five emergency reviews (e-mail and phone conferences) and in total reviewed 142 CDE data collections, a 38% increase over the 103 collections reviewed in 2006-07. Accomplishments included adopting bylaws, providing input into CDE's Data Dictionary, and contributing to the North Highland Data Infrastructure Review. In addition, discussed at length in a special section at the end of this report is a recommendation to eliminate the use of SSNs by generating and utilizing Colorado education identification numbers as promptly as possible.

**Accomplishments**

- Reviewed 142 CDE data collections, a 38% increase over the 103 collections in 2006-07
- Discovered no CDE data collections that had not been reviewed by EDAC
- Eliminated repetitive reporting across several collections
- Provided ongoing input regarding the department's Data Dictionary project in accordance with HB07-1320 Concerning Education Data Management
- Contributed to the North Highland comprehensive review of the state's educational data infrastructure as required by HB07-1270
- Adopted EDAC bylaws
- Formalized a process for recommendations for repeal or amendment
- Increased awareness of EDAC both internally and externally to the department
- Focused on CDE adherence to the 90-day notice requirement imposed under HB07-1320

**Future Focuses**

- Continue to increase awareness of EDAC both internally and externally to the department
- Specifically, educate CDE about the new repeal or amendment process
- Find ways to obtain additional district feedback regarding forms being reviewed
- Spend designated meeting time expanding knowledge of certain data collection efforts
- Continue to expand the automation of CDE data collections
- Determine more precise fiscal impact of CDE data collections to respondents
- Broaden EDAC focus on justification for data collection
- Survey CDE constituents regarding EDAC experiences

## Forms Review

**Form Compliance.** EDAC spends the bulk of its efforts on forms review. EDAC has two levels of review. A full review is for any collection which has not been previously reviewed or to which programmatic or substantial changes are being made since its last review. An update approval is for any collection which has previously been reviewed and only has date and other extremely minor changes. A collection may only have a maximum of two consecutive update approvals before it must return to EDAC for a full review. Stamps are attached to each data collection declaring whether a form is mandatory, required to obtain benefit or voluntary. The definitions of these labels are:

- **Mandatory.** This form must be completed by all appropriate agencies. Funding may not be attached to this collection but it is statutorily required. However, funding that an agency would otherwise receive may be withheld if this form is not completed.
- **Required to Obtain Benefit.** Funding or services are attached to the completion of this form. An agency may choose not to complete the form but the related funding/services will not be available.
- **Voluntary.** The collection is not a direct requirement of state or federal legislation but may yield useful data with sufficient and representative sample size.

One-half (50 percent) of forms which EDAC reviewed in 2007-08 are labeled 'Required to Obtain Benefit'. Very few (30 percent) are 'Mandatory' and even fewer (20 percent) are 'Voluntary'. If districts or BOCES are interested in securing particular funds or services, then some amount of data collection is associated with the benefits derived. In exceedingly rare circumstances, the EDAC chairman may issue a small collections stamp to an extremely small data collection without EDAC review.

Form Compliance	Mandatory	Required to Obtain Benefit	Voluntary	Total
• Full Review	23	35	16	74
• Update Approvals	19	36	13	68
<b>Total Reviews</b>	42	71	29	142
• Review Approval Withheld/Revoked	0	0	3	3
• No Approval Required				3
• Informational Briefings				12
• Small Collection				3

**Review Outcomes.** EDAC is tasked with making recommendations to improve the efficiency and effectiveness of data collection instruments. Very few collections move through the EDAC full review process without some suggestions for improvement. Most are approved with some minor adjustments, others with more detailed issues are invited to resubmit the collection before a stamp is issued, and in extremely rare circumstances, a data collection is not approved for various reasons. These may include that the collection was distributed prior to EDAC review, the requested data is already available, poor survey design or the collection is withdrawn for later EDAC reconsideration. EDAC encourages the automation of data collection. There were two collections which converted from a manual paper process to an electronic format.

	<b>Approved No Changes</b>	<b>Approved With Changes</b>	<b>Not Approved Resubmit</b>	<b>Not Approved (No stamp issued)</b>	<b>Total</b>
<b>Review Outcomes</b>	86	47	6	3	142

**Review Preparation.** EDAC posts its meeting schedule well in advance of the upcoming school year so that CDE staff can schedule an EDAC review as part of their regular routine within their data collections. EDAC must be given the review materials in a timely manner so that members have sufficient time to prepare judicious input to share with the data collector. EDAC acknowledges that in extremely rare circumstances, department data requestors may need to submit reviews during periods for which no regular meetings are scheduled. Emergency conference calls or electronic mail reviews are available because a change in state statute or some unforeseen circumstance occurs which prevents the collection from being presented at a regularly scheduled EDAC meeting. EDAC conducted 18 emergency reviews on five separate occasions in 2007-08 and is committed to keep these to a minimum in the upcoming school year. EDAC conducted 18% fewer emergency reviews in 2007-08.

	<b>Meeting Materials Submitted On-Time</b>	<b>Meeting Materials Submitted After Deadline</b>	<b>Emergency Reviews</b>	<b>Total</b>
<b>Review Preparation</b>	102	22	18	142

**Type of Collection.** The majority of EDAC reviews centered on existing CDE data collections. One-fifth (19 percent) of the data collections EDAC reviewed in 2007-08 were newly required through legislation or rule. The number of new collections increased 42% to 27 over the 19 newly required collections in 2006-07. EDAC is continuing to make every effort to identify and bring to the table those CDE data requestors who are not yet familiar with the EDAC review process.

	<b>New Collections</b>	<b>Existing Collections On-Schedule Reviews</b>	<b>Existing Collections First Time or Delayed Reviews</b>	<b>Total Reviews</b>
<b>Type of Collection</b>	27	98	17	142

## **CDE Necessity to Promptly Convert from Use of SSNs to Colorado Education ID Numbers**

Headlines floating across newspapers nationwide declare incidences of breaches of confidential information. Due to careless behavior or cunning computer hackers, private information has reached the hands of persons for which it was never intended. As a result there have been increased attempts to protect the confidentiality of all citizens.

Our state is no different. There has been a history of legislation across the years intending to protect Coloradoans. Legislation passed in 2003 (HB03-1175) prohibited postsecondary institutions from using Social Security Number (SSN), or any portion thereof, as a primary identifier after July 1, 2004. A 2006 law (HB06-1156) increased consumer rights regarding the use of Social Security Numbers and prompted the state of Colorado to issue employee identification numbers to approximately 40,000 employees by January 2008. The Quality Teachers Commission (SB07-140), in its role to provide recommendations to the legislature on a teacher and principal identifier system, investigated the capacity of the Colorado Department of Education (CDE) to implement an identifier protocol and determined that CDE has the knowledge and experience to develop and maintain such a system contingent upon additional resources.

CDE should be proactive in eliminating this security risk. There have been no security violations within state education, but there are known cases within other Colorado state agencies and within school districts. The potential for a security breach is ever present, therefore the department should do all in its power to promptly cease using SSN as a primary reporting field. System conversion would allow a more secure method for dealing with state and federal reporting mandates and would place CDE in a position to readily address the forthcoming usage recommendations of the Quality Teachers Commission.

Although the department uses secure systems through which licensing and human resources data are collected, the current use of Social Security Number as an identifier is a practice that should be discontinued as soon as possible. With a history of the department developing a process and issuing over 750,000 State Assigned Student Identifiers (SASIDs) within a seven month time span in 2002, the issuance of Colorado education identifiers to just over 100,000 persons involved in providing education services in school districts and BOCES could be accomplished in a relatively short time frame given adequate resources.

The use of Colorado Education ID Number should not however, be limited to elementary and secondary educators but in the future be expanded across all facets of the education spectrum. This would allow a rich basis for analysis as educators move across education levels.

### **EDAC Recommendations:**

- CDE should implement a Colorado education identifier as soon as possible
- Legislature should provide necessary funding to accomplish this goal
- Future identifier expansion should include pre-kindergarten through postsecondary (P-20)