



**Education Data Advisory Committee (EDAC)
2017-18 Annual Report to the State Board of Education and the
Education Committees of the Senate and House of Representatives**

July 1, 2017 - June 30, 2018

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) and other state agency PK-12 data collections including grant applications, surveys, plans, reports, assessments, evaluations and automated data transfers. 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 collections are redundant and proposes alternatives, and reviews data collection procedures and recommends improvements to CDE. Each EDAC-approved data collection is given a stamp which informs local education agencies whether the form is mandatory, required to obtain benefit, or voluntary. Collections without an EDAC stamp are not required to be completed.

In 2017-18 EDAC formally met twelve times, conducted seven emergency reviews (via e-mail) and in total reviewed 174 CDE data collections, a 3.9 percent decrease from the 181 collections reviewed in 2016-17. Accomplishments include conducting a data burden survey, collaborating with CDE auditors to enhance documents and procedures, and broadening knowledge about legislative and rulemaking processes. In a special section at the end of this report, EDAC presents empirical evidence of the time and effort needed for various data collections, in an effort to ultimately reduce local education agency data burden.

Accomplishments

- Reviewed 174 data collections, 7 less than in 2016-17. Of these, 43 collections were closed or one time only collections from the previous year and 36 collections were new.
- Conducted the EDAC Data Burden Survey to quantify data collection time and effort in conjunction with the value to local education agencies (LEAs). EDAC released the voluntary survey in November 2017 to all LEAs and broadly communicated its significance. The survey included mandatory and other select collections. EDAC received 137 replies for a 51.1% response rate demonstrating its importance to LEAs. Results are found within the special section on pages 5 and 6.
- Provided the impetus for a partnership between the Field Analyst Support Team (FAST) and local education agencies to improve auditing processes and documents.
- Gained a clearer understanding of rulemaking and legislative processes.
- Focused on specific reporting requirements as outlined in law or rule and considered breadth of interpretation to minimize burden to districts.
- Delivered advice to streamline collections.
- Continued an intensive schedule to meet the April 1st advance notice requirement of 22-2-306(3)(a), C.R.S. Less than a third (30%) or 52 collections were reviewed in March.

Future Focus Areas

- As each collection is presented, continue to inquire about communication of prior outcomes accompanied by resulting program changes.
- Monitor impact of state vs. federal accountability on schools as required by Every Student Succeeds Act including military/foster collections and LEA report cards.
- Contribute expertise to statewide student information system survey.
- Continue to watch for Student Data Transparency and Security Act, HB16-1423, violations reporting to CDE.

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 minor changes. A collection may only have a maximum of three 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 or may not be attached to this collection but it is statutorily required. Any 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 then 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.

Two-fifths (40%) of collections which EDAC reviewed in 2017-18 are labeled ‘Required to Obtain Benefit’. More than one-third of collections (37%) are ‘Mandatory’ and less than one-quarter (23%) are ‘Voluntary’. These 2017-18 percentages represent a six percentage point decrease in required for benefit collections. If districts, BOCES or CSI 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 an exiguous collections stamp to an extremely small data collection without EDAC review. For example, the confirmation of local education agency contacts for a particular program would fall in this category. Forty-three collections were discontinued from the prior year.

Form Compliance	Mandatory	Required to Obtain Benefit	Voluntary	Total
• Full Review	14	41	30	85
• Update Approvals	51	29	9	89
Total Reviews	65	70	39	174
• Review Approval Withheld/Revoked	1	0	0	1
• No Approval Required				0
• Informational Briefings				14
• Small Collection				3
• Closed Collections	3	22	18	43

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 unanimously with some minor adjustments, others with more detailed issues are invited to resubmit the collection for review before a stamp is issued, and in extremely rare circumstances, a data collection is not approved. A collection may not be approved because the collection was distributed prior to EDAC review, the requested data is already available, the survey is poorly designed or the collection is withdrawn for later EDAC reconsideration. EDAC also encourages the automation of data collections and five were: three collections were converted from manual entry into Excel files to automated systems and two paper forms were converted to an electronic submission. One EDAC non-approved collection, Parent Notification Letter (SPS-139), was sent out without following the established EDAC appeal process.

	Approved No/Few Changes	Approved With Changes	Not Approved/Resubmit	Not Approved (No stamp issued)	Total
Review Outcomes	127	46	0	1	174

Interpretation: EDAC reviews every collection in detail and works with presenter until edits are mutually acceptable.

Review Preparation. EDAC posts its meeting schedule well in advance of the upcoming school year so that CDE staff can plan 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 if 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 seven emergency reviews on five separate occasions in 2017-18, decreasing from 11 emergency reviews on five separate occasions in 2016-17. EDAC is committed to keeping emergency reviews to a minimum.

	Meeting Materials Submitted On-Time	Meeting Materials Submitted After Deadline	Emergency Reviews	Not Reviewed	Total
Review Preparation	155	12	7	0	174

Interpretation: Seven percent of review materials are submitted after the required deadline which restricts EDAC's ability to provide thoughtful feedback.

Type of Collection. A large majority of EDAC reviews centered on existing CDE data collections. One-fifth (21%) of the data collections EDAC reviewed in 2017-18 were newly required through legislation or rule. The number of new collections decreased to 36 in comparison to 42 new collections in 2016-17. 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. No delayed reviews occurred in 2017-18.

	New Collections	Existing Collections On-Schedule Reviews	Existing Collections First Time or Delayed Reviews	Total Reviews
Type of Collection	36	138	0	174

Interpretation: One of EDAC's goals is to reduce the number of collections and the associated data burden. However, new legislation and rules often necessitate additional reporting requirements.

2018 Legislative Follow-up

There were five legislative recommendations highlighted in the *Education Data Advisory Committee 2016-17 Annual Report*. EDAC recommendations and resulting actions were 1) *Eliminating collections with no relevance*. While the legislature didn't pass any bills specifically to reduce data burden by eliminating collections, EDAC hopes to have empirical evidence through the EDAC Data Burden Survey to make strides in this area. Due to voiced concerns, the Teacher Student Data Link collection has been put on hold for the 2018-19 school year. 2) *Reducing assessment data burden*. Such an action is relevant and necessary, but this effort would require legislative or State Board action. 3) *Making financial resources available to fund local education agency (LEA) data privacy, data collection and reporting requirements*. No additional funds for LEAs were set aside. However, there were continued conversations about the Budget Stabilization Factor. It is understandable why the special education high cost student reimbursements were not fully funded, as this would be an exorbitant expense for the state. 4) *Creating a sunset review process for reports*. While this was not undertaken, HB18-1222 Systematic Review of Education Programs as introduced by Representative Jon Becker would have required the state auditor to create and complete regular and ongoing audits of K-12 education programs. Although the proposed legislation was postponed indefinitely, it brought attention and importance to the education program reports that are produced for the legislature. 5) *Reverting In-Field teacher requirements to 24 hours*. No action was taken to revert the in-field teacher requirement of 36 hours to 24.

2019 Legislative Recommendations

- **Eliminate Teacher Student Data Link (DMC-118)**. Local education agencies complete collections that carry little or no inherent value. The collection mentioned most often is the Teacher Student Data Link. EDAC's Data Burden Survey has confirmed that this is a high effort low benefit collection. LEAs spend on average \$1,294 to complete this collection from which they receive little in return.
- **Eliminate Kindergarten School Readiness Reporting (DMC-133)**. Section 22-7-1004(2)(b) C.R.S., prohibits the collection of individual level results and directs the state board to adopt a system for aggregate reporting. However, the requirement to report the number of domains that children have mastered is not valuable. To be constructive, the report should at a minimum identify readiness domains. Administering the assessments is time intensive. The completion of the collection instrument doesn't take long, but the benefit of the current report format is trivial.
- **Abolish Report Card March (DMC-104)**. Colorado legislation, 22-11-503(3)(f) and (g) specify the public school courses, programs and services available to students to be broadcast within school performance reports. Within our 2016-17 annual report, EDAC provided Report Card March as an example of a collection with no relevance. Although this report is relatively easy to complete, it provides little return value to the districts as demonstrated by its low effort low benefit survey rating. Local education agencies with district choice have stated they do not need this resource to publicize it.
- **Eliminate the Principal Preparation Program (OPS-103)**. Principal standard legislation, 22-2-109(7) C.R.S., requires superintendents to be surveyed about the quality of principals within their first three years of employment. However, this collection is duplicative. The objective of this legislation is to measure the quality of principal preparation programs. This information can be obtained through the quality standard ratings of these same principals within the Human Resources collection.
- **Limit Unified Improvement Plan (SPS-135) Participation**. Require the UIP planning process only for LEAs designated as priority improvement or turnaround. Such an action would greatly reduce data burden for those performing at expected levels as evidenced by the data burden survey rating of high effort low benefit. All districts are expected to improve student learning and system effectiveness by engaging in their own internal cycle of continuous improvement.

2017-18 EDAC Data Burden Survey: An Empirical Analysis of Colorado Local Education Agencies on Data Reporting Burden, Collections and Submissions

Educational data is imperative to support student learning and success. Data is a valuable asset to the mission of education. However the increasing data reporting requirements put an undue burden on local education agencies, especially those which are rural. There has been an ongoing, yet growing, conversation about the reduction of resources directed to student instruction. The Education Data Advisory Committee (EDAC) decided to survey local education agencies directly on data burden to confirm or deny past and current recommendations.

EDAC released the survey in November 2017 to all local education agencies and broadly communicated its importance. The survey included mandatory and other select collections. The focus was on the effort needed to submit, the benefit obtained from, and the cost of completion for each data collection. EDAC received 137 representative replies for a 51.1% response rate. Available CDE data was added to the surveys to enrich our analysis. Costs were calculated by multiplying the Total Person Hours Spent Working on the Submission by an average hourly pay amount for data collection respondents (\$32 rural, \$33 non-rural) as reported within the 2017-18 Human Resources collection.

EDAC utilized a data quadrant approach to display each collection's median person hour costs and whether, on average, LEA respondents felt the collection was beneficial. EDAC members viewed the results and recorded key observations including expected results and surprises. EDAC is recommending elimination of four collections and the legislation and/or rule requiring them as well as limiting participation in CDE's required Unified Improvement Planning process to districts on priority improvement and turnaround. EDAC made general suggestions for all audiences of the survey. EDAC Data Burden Survey results may be [viewed here](#).

Legislature

Repeal Low Benefit Collections

- *Repeal Performance reports – contents- C.R.S. 22-11-503(3)(f-g) to eliminate Report Card March.*
- *Repeal Commissioner Duties- reviewing the content of educator preparation programs in Colorado, C.R.S. 22-2-112 (p-q); Monitoring of Written Evaluation System, C.R.S. 22-9-106 (1.5) (a-b); and Student Performance by Course Level, C.R.S. 22-11-503.5 (I-II) to remove Teacher Student Data Link.*
- *Repeal School readiness assessment C.R.S. 22-7-1004(2)(b) to eliminate Kindergarten School Readiness reporting requirements.*
- *Repeal State board of education additional duties (superintendent survey) C.R.S. 22-2-109(7) to eliminate Principal Preparation Program survey.*
- *Alter Accredited or Accredited with distinction C.R.S. 22-11-303 and Accredited with improvement plan C.R.S. 22-11-304 legislation to require the Unified Improvement Plan process only for LEAs on priority improvement and turnaround.*

Reevaluate Existing Collections Regularly

- *Sunset state-required reports and submissions after five years pending legislative review.*
- *Carefully evaluate each low benefit collection, both high effort and low effort.*
- *Going forward implement a moratorium on data collection, including changes to existing collections.*
- *Consider operational impact of each new collection. Please note that rural districts spend twice as much of their district overall budget on data reporting as larger districts (\$5.67 vs. \$2.85 respectively).*
- *Support data burden relief whenever possible for all local education agencies, especially those in rural areas. Since 1998 the effort (cost) to submit only the major collections has steadily increased, and has grown by 53% over that 20-year period.*
- *Consider a voluntary statewide Student Information System (SIS).*

State Board of Education

Remove Low Benefit Collection Rule Requirements

- *Remove Health and Wellness- 1 CCR 301-1 11.05(G) to eliminate Report Card March.*
- *Remove Rules for administration of a statewide system to evaluate the effectiveness of licensed personnel employed by school districts and boards of cooperative services 1 CCR 301-87(6.04) (i), (A), (C) (2) (b, d, and e), and (C) (3) (a) to eliminate Teacher Student Data Link.*
- *Eliminate Kindergarten School Readiness reporting consistent with current law C.R.S. 22-7-1004(2)(b).*
- *Alter 1 CCR 301-1 Administration of Statewide Accountability Measures for the Colorado Public School System, Charter School Institute, Public School Districts and Public Schools to require the Unified Improvement Plan process only for LEAs on priority improvement and turnaround.*

Reevaluate Existing Collections Regularly

- *Evaluate and sunset duplicative and low benefit state-required reports and submissions.*
- *Review data requirements in rules.*
- *Consider staff and EDAC data recommendations on an annual basis.*
- *Evaluate operational impact of each new collection. Please note that rural districts spend twice as much of their district overall budget on data reporting as larger districts (\$5.67 vs. \$2.85 respectively).*
- *Support data burden relief whenever possible for all districts, especially those in rural areas. Since 1998 the effort (cost) to submit only the major collections has steadily increased, and has grown by 53% over that 20-year period.*
- *Consider a voluntary statewide Student Information System (SIS).*

Colorado Department of Education

Reevaluate Existing Collections Regularly

- *Review reporting obligations on an annual basis to ensure alignment with legislative data reporting requirements.*
- *Carefully evaluate each low benefit collection, both high effort and low effort.*
- *Consider operational impact of each new collection. Please note that rural districts spend twice as much of their district overall budget on data reporting as larger districts (\$5.67 vs. \$2.85 respectively).*
- *Support data burden relief whenever possible for all districts, especially those in rural areas. Since 1998 the effort (cost) to submit only the major collections has steadily increased, and has grown by 53% over that 20-year period.*
- *Require the Unified Improvement Plan process only for LEAs on priority improvement and turnaround.*
- *Integrate CDE data systems to increase reporting effectiveness and efficiencies to include special education, educator licensing/evaluations and federal systems data collection and reporting.*
- *Consider a voluntary statewide Student Information System (SIS).*
- *Present annual data recommendations to the State Board.*

Local Education Agencies and Other Stakeholders

- *Speak with legislators and State Board representatives about these data burden recommendations.*
- *Provide feedback and suggestions to EDAC members and CDE staff for improving, reducing, and eliminating collections.*
- *Increase participation in fiscal note process.*