



**Education Data Advisory Committee (EDAC)
2016-17 Annual Report to the State Board of Education and the
Education Committees of the Senate and House of Representatives**

July 1, 2016 - June 30, 2017

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 districts and BOCES whether the form is mandatory, required to obtain benefit, or voluntary. Collections without an EDAC stamp are not required to be completed.

In 2016-17 EDAC formally met ten times, conducted five emergency reviews (via e-mail) and in total reviewed 181 CDE data collections, an 11 percent increase from the 163 collections reviewed in 2015-16. Accomplishments include safeguarding personally identifiable information, providing feedback on draft privacy resources, and assisting various CDE units facing new or changing collection challenges with in-depth consultation. In a special section at the end of this report, EDAC explains how they are taking action to reduce local education agency data burden.

Accomplishments

- Reviewed 181 data collections, 18 more than in 2015-16. Of these, 59 collections were closed or one time only collections from the previous year and 42 collections were new. Regarding the difference, several collections were grants not funded the prior year.
- Required presenters to explain how Personally Identifiable Information (PII) is protected.
- Delivered actionable guidance to CDE to develop Student Data Transparency and Security Act (HB16-1423) privacy resources, for example security policy feedback.
- Brought local education agency perspective to reviewed collections by conducting intensive grant reviews focused on requirements, fund utilization and ease of use, as well as by concentrating on how collections benefit students and how results are disseminated.
- Provided intensive consultation regarding kindergarten school readiness, the Teaching and Learning Conditions Colorado survey and the federal program consolidated application.
- Continued an intensive schedule to meet the April 1st advance notice requirement of 22-2-306(3)(a), C.R.S. Over a quarter (28.3%) or 51 collections were reviewed in March.

Future Focus Areas

- Quantify data collection time and effort in conjunction with the value to local education agencies.
- Focus on specific reporting requirements as outlined in law or rule and consider breadth of interpretation to minimize burden to districts.
- As each collection is presented, inquire about communication of prior outcomes accompanied by resulting program changes.
- Follow changes required by Every Student Succeeds Act, including assessments.
- Monitor 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.

About half (46%) of collections which EDAC reviewed in 2016-17 are labeled ‘Required to Obtain Benefit’. One-third of collections (35%) are ‘Mandatory’ and one-fifth (19%) are ‘Voluntary’. These 2016-17 percentages represent a five percentage point increase in required for benefit collections. Only one collection approval was withheld. 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. For example, the confirmation of local education agency contacts for a particular program would fall in this category. Fifty-nine collections were discontinued from the prior year.

Form Compliance	Mandatory	Required to Obtain Benefit	Voluntary	Total
• Full Review	17	51	26	94
• Update Approvals	46	31	9	86
Total Reviews	63	82	35	180
• Review Approval Withheld/Revoked	1	0	0	1
• No Approval Required				0
• Informational Briefings				16
• Small Collection				3
• Closed Collections	10	31	18	59

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 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 two were. One collection progressed from paper to online and the other was converted from an Excel file to Data Pipeline.

	Approved No/Few Changes	Approved With Changes	Not Approved/Resubmit	Not Approved (No stamp issued)	Total
Review Outcomes	140	37	3	1	181

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 eleven emergency reviews on five separate occasions in 2016-17, increasing from five emergency reviews on two separate occasions in 2015-16. 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	163	7	11	0	181

Interpretation: 10% 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-quarter (23.3%) of the data collections EDAC reviewed in 2016-17 were newly required through legislation or rule. The number of new collections increased to 42 in comparison to 39 new collections in 2015-16. 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. There were no delayed reviews in 2016-17.

	New Collections	Existing Collections On-Schedule Reviews	Existing Collections First Time or Delayed Reviews	Total Reviews
Type of Collection	42	139	0	181

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.

2017 Legislative Follow-up

There were three legislative recommendations highlighted in the *Education Data Advisory Committee 2015-16 Annual Report*. EDAC recommended 1) providing financial resources to fund local education agency (LEA) privacy, data collection and reporting requirements, 2) encouraging data stewardship, and 3) aligning Colorado education legislation with Every Student Succeeds Act. EDAC continues to reiterate the need for supplemental LEA financial resources for data collection and reporting demands. While the legislature didn't pass any bills specifically to reduce data burden, the Exceptional Student Services Unit was able to minimally reimburse administrative units for Indicator 14 Post School Outcome interviews that were previously conducted by vendors. In terms of data stewardship, the cross-agency Education Subcommittee of the Governor's Data Advisory Board periodically met this past year, however EDAC recommends regular convening in the future to address privacy and other concerns. As ESSA requirements were defined and finalized, there was one Colorado law enacted that aligned. HB17-1294, Counting ASCENT Program Students In Graduation Rate sponsored by Representative Weissman and Senator Todd, requires Accelerating Students through Concurrent Enrollment (ASCENT) participants to be counted as four-year graduates, as specified within ESSA.

2018 Legislative Recommendations

- **Eliminate collections with no relevance.** Local education agencies complete collections that carry little or no inherent value. Two collections that are often mentioned are Report Card March and the Teacher Student Data Link. EDAC is taking action in the 2017-18 school year to assess burden and relevance of mandatory and other lengthy collections. See the special section entitled 'EDAC to Address Data Burden'.
- **Reduce assessment data burden.** Assessments are time-consuming and arduous on districts. Three recommendations would assist. First, assessments should be condensed to meet the minimum required by federal legislation. Secondly, the time frame specified within assessment contracts should be lengthened to five or more years to increase student accountability consistency. Lastly, all Colorado requirements, including due dates, should be specified within any negotiated vendor contract to lessen LEA data burdens. Currently, districts must massage existing data to meet vendor specifications and do not have adequate time to address testing follow-up procedures.
- **Make financial resources available.** Local education agencies face competing resources and often must prioritize between utilizing current funds to educate students or meet data requirements. Two areas in which to provide adequate funding are by eliminating the budget stabilization factor, formerly the negative funding factor and by fully funding the special education high cost student reimbursements.
- **Create a sunset review process for reports.** Similar to functioning committees the legislature should periodically review legislatively-mandated reports for the value the report provides. The Colorado General Assembly may find that some reports are no longer useful or out of date.
- **Revert In-Field teacher requirements to 24 hours.** Teachers who were previously highly qualified via 24 semester hours must take an additional 12 hours to be In-Field under ESSA which is a financial and time burden. Returning the minimum hours to 24 instead of 36 would align with the endorsement requirement within Colorado's state licensure system and eliminate significant local education agency confusion.

EDAC to Address Data Burden

Educational data is imperative to increase and support student learning and success. Data is a valuable asset to the mission of education. Recognizing the significance of data, the 2015-16 annual report of the Education Data Advisory Committee (EDAC) made a legislative recommendation to carefully weigh the benefit/value of new data reporting requirements, in addition to data burden, to local education agencies (LEAs) as well as to the state. A collection in which districts spend an inordinate amount of time and receive little to no useful information in return is strongly discouraged. Additionally, local resources are tighter than ever due to the continuing budgetary stabilization factor. Data collection efforts are pulling precious resources away from classroom instruction. Monies spent on collection and reporting detract from students.

Recently the legislature has proposed several* and successfully passed a few❖ bills to reduce data burden. CDE has decreased burden by focusing data within certain collections^ . Over the past few years, the call to reduce data burden has been getting louder. Organizations, such as the Colorado Rural Schools Alliance♦, have been increasing advocacy around this issue for the local education agencies they represent. The efforts that have been done are not enough. EDAC has heard the concerns. Local education agencies do not have the resources to complete the numerous data collections, especially when there is no perceived value or relevance. Growing frustrations are mounting about the volume of work needed to complete the existing 63 mandatory collections.

EDAC is taking action! In the 2017-18 school year EDAC will assess burden and relevance of ‘mandatory’ and other time-intensive collections. Our end goal is to lessen data burden. A one-time voluntary survey has been designed to quantify the time selected collections take, determine the value/relevance of each and assess usefulness to inform educational policy or research. All local education agencies are encouraged to respond so that EDAC can justify the recommendations made in next year’s report. Additionally a standalone report of EDAC’s study findings will be produced. It is hoped that this study will shine a light on burdensome LEA collections to the General Assembly and the Colorado Department of Education with the intention that collaborative efforts will ensue to reduce LEA burden.

During the next year EDAC is committed to:

- ✓ Quantify data collection time and effort in conjunction with value and usefulness
- ✓ Focus on specific reporting requirements as outlined in law or rule and consider breadth of interpretation to minimize burden to districts
- ✓ Inquire about communication of prior outcomes accompanied by resulting program changes
- ✓ Follow changes required by Every Student Succeeds Act, including assessments
- ✓ Identify and question stagnant and redundant collections

* *HB 15-1155 Flexibility for Rural Districts would have allowed small rural districts to submit certain report biennially instead of annually. HB 15-1322 Study of Local Education Provider Data Reporting Requirements would have prompted a review of all statutory and regulatory data reporting requirements to determine whether or not there are items that should be repealed due to provision of unnecessary data or creating an undue district burden.*

❖ *HB 14-1204 Rural Flex Bill allowed biennial (every other year) submission of the Unified Improvement Plan (UIP) for small, rural schools with a Performance plan type assignment and districts that are Accredited or Accredited with Distinction; HB 16-1440 Flexibility in UIP Submission expanded this same flexibility to all schools and districts. HB 15-1321 Flexibility and Funding for Rural School Districts allows small rural districts to report expenditures only at the district level.*

^ *CDE prepopulates about 60-75% of the federal Civil Rights Data Collection for LEAs; Teacher Student Data Link has morphed from all subjects to only courses in English/language arts, math, science and social studies*

♦ *The Colorado Rural Schools Alliance discussed the need to reduce data burden with EDAC on January 8, 2016*