

# Minutes

cde



# Colorado Department of Education EDAC Committee

January 7, 2022  
9:30 a.m.-11:55 a.m.  
Virtual Meeting

Meeting called by:

Educational Data Advisory Committee

Type of meeting:

Scheduled Data Review Meeting

Facilitator:

Jan Petro

Note taker:

Peter Hoffman

Attendees:

Lazlo Hunt	Mimi Livermore
Eric Mason	Patrick Mount
Mina Parthasarathy	Andrew Pippin
Lorraine Saffer	Chris Selle
Cheryl Taylor	
CDE:	
Jan Petro	Marcia Bohannon
Peter Hoffman	
Guest: Sed Keller	

## Agenda topics

### General Business

- Temporary EDAC facilitator – Jan Petro introduced
- Meeting Minutes December 3, 2021 - Approved
- Tentatively Scheduled February Collections – No concerns
- Late Item Submissions (MARKED IN RED)
- EDAC Credit Renewal
- Bylaws Overview

Conversation largely around Article II:

What does "'at the request of a LEA" really mean?

What are the procedures for when a LEA requests a data review?

How can this be made clear? What is the historical View?

Send an email or attend meeting - or Chair will bring concerns up with the committee when the item is discussed. If there is concern - should they send a letter to the chair? Yes, or, EDAC member could bring up the points when the item is discussed. What are the right protocols when districts raise their hands? It the obligation of the EDAC member to bring it up to the committee. Form is on the website to submit requests of review / change of a collection.

We want to make sure that if something is required, it is only required for the specific needed respondents.

Question from districts has been around the calendaring of the review of submissions.

Sometimes collections are given approval and sent out and districts bring up concerns that might have been missed? Can districts bring these concerns to EDAC?

Response should typically be - we can bring items to EDAC to consider the next time it is up for review. Sometimes special circumstances can be created to work with data collection owners in CDE to make changes for the next review. Clarity needed - can districts ask for a re calendaring review on a submission; can EDAC have a process to look at a submission and request the department to re look at a collection. The districts want a voice in the calendar if their concerns are significant enough.

Should a collection be reviewed in the middle of an annual cycle that has already been given out?

Eric - Yes if EDAC missed something that is causing a burden to the districts

Andy - Yes, if we are getting feedback and we can make the changes to lessen burden we should

Marcia - What is defined as severe and significant? This needs to be defined very carefully since changes to collections will cause a lot of burdens in changing systems / vendors / etc.

Eric - prefers to keep less defined to give Chair and EDAC the leeway and ability to determine if something needs to be addressed.

When EDAC identifies something that may be beyond legislation and statute, is it getting the attention it needs at the general assembly and state board?

What happens when concerns start to rise? EDAC is in existence to address the concerns of the district. Is there a way to communicate to the right people the concerns that EDAC discovers throughout the year?

Challenge is burden vs value. Districts don't always see the value since the data is for other purposes. The right people are not hearing the concerns. State Board is not hearing EDAC's recommendations as much as they should, nor the general assembly. What can EDAC individuals do? Talk to local legislators and boards.

Can Katy address these concerns? Possibly. But there have been so few areas where it has risen to this level since EDAC usually works with CDE on compromise. Difference of interpretation of statute has led to these, and Katy's hands were tied in resolving them. Can we have Katy come and talk with EDAC to find ways to ensure that EDAC is heard more broadly? Decided that this is not needed right now. They want the benefit to districts to be apparent - and avoid the impression from districts that CDE just digs in when there are concerns to appease the state board. Goal should be a collaborative relationship.

Current method is the re envision process - if we know a collection will be rejected next cycle then we collaborate with the collection SME's to get the collection to a place that is a better way for the districts, and this should be the first step.

Ideally EDAC should be the medium to create a compromise between the districts and CDE

Should Marcia to setup a time for Katy to come and meet with EDAC? No.

Who are the right ears? State board and legislature seem to pass blame between each other with CDE in the middle.

Does legislature have to approve EDAC bylaws? No, But there is a question of how far we can push the bylaws within the statute.

A good step forward is reminding CDE that it is incumbent upon the department to learn what is going to be challenging for a district and schools to submit. CDE needs to defend this versus the legislation and prove where they can't get this information from other sources. We need to get back to what the bylaws set out for EDAC to do in evaluating the submissions.

Over time it has gotten better and we need to keep working to improve it.

DARU was EDAC predecessor. Things went haywire and everything was being collected. CDE implemented EDAC prior to legislation. Legislation was written around how EDAC operated a few years later.

Should we ask Katy view email the questions about getting EDAC more exposure / how do we get our concerns in front of the right people? Possibly start there and see where it leads.

**Update Approval – All approved with none pulled / no questions.**

- CCC-101 VE-135 CTE Secondary Enrollment Data File
- CCC-102 VE-130 CTE Instructors Data Collection
- CGA-249 Early Literacy Grant – Professional Development
- TAL-103 Colorado Preschool Program Annual Report and Reapplication

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ADA-101 Request to Reconsider Feedback Survey (Review)

Aislinn Walsh

**Overview:** To submit feedback on the modified 2021 request to reconsider process so CDE can make adjustments for 2022. Request to Reconsider is required per HB18-1355 and, as a result of the accountability pause, H.B. 21-1161 enabled the state to offer a modified request to reconsider process to schools and districts on the accountability clock (i.e., Priority Improvement, Turnaround). Board rule 1CCR 201-1 8.0A describes the requirements for a request to reconsider during the accountability pause, including the consideration of both qualitative and quantitative data. This survey would provide needed feedback on this modified process.

**Discussion: Is it voluntary? Yes**

**Make sure to clarify the language in the justification portion for submissions on where it specifies the collection is required for better understanding of legislation and why the collection is needed.**

**Conclusion: Approved with minor changes**

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NU-148 Student Pandemic EBT (P-EBT) Reimbursements (Review)

Rachael Burnham, Lori Ludwick-Pascuzzi

**Overview:** The Pandemic EBT (Electronic Benefits Transfer) program (P-EBT) is an assistance program that provides a monetary benefit to eligible children who are not able to receive, or have limited access to, free or reduced-priced school meals due to school closures caused by COVID-19 restrictions. The CDE School Nutrition Unit has again partnered with the Colorado Department of Human Services (CDHS) to provide these benefits to children in Colorado. During the 2019-20 school year, these benefits were issued primarily through an online application process, which resulted in many barriers to the timely issuance of benefits. For the 2020-21 school year, CDE and CDHS utilized student level data provided by districts to directly issue P-EBT benefits to eligible students. This process proved to be a much more successful and CDE is proposing to conduct a similar process for the 2021-22 school year. For the 2021-22 school year, CDE is requesting that school districts again provide student

level data to issue P-EBT benefits. In order to meet new federal guidelines for P-EBT, adjustments need to be made to the file layout specifications that were utilized in the previous year.

**Discussion: Can this be changed from Mandatory to Required to Obtain benefit? Data submission people in district felt harassed at times with the requirement. The collection is required to obtain benefit – CDE documentation to be updated.**

**Universe collection submission is OK, filtering is also OK. Smaller rural districts find full submission is better.**

**Ideally First collection opens in mid-March for 4 weeks. Was there feedback that the March timeline is good? Original hope was to open in January and feedback from districts was that January was too aggressive. It was pushed as far as reasonable to enable benefits to be sent to students as soon as possible.**

**Why do they need to provide universe? Feedback was given that universe collection can be easier but selective submission is allowed as well. Universe collection gives a better picture of a students situation throughout the year. Thought was it would be easier for districts to just provide all of the students and have CDE pull the students. It is important to make it abundantly clear that it is optional to submit universe data and selective submission is ok. Gives appearance that districts are sending income information to the state that doesn't go over well in smaller rural districts.**

**Would removing the "add all students" and change to add students be the best solution? Removing the word all students would be helpful. Note at the bottom should say preferred method is all students but LEAs have the option to selectively submit would be ideal. Explanation needs to be given to vendors as well on the option of all students or selective students. Vendors need to know that this must be accounted for.**

**Emphasis on how small rural communities perceive the sharing of personal data.**

**Section on justification needs to be more detailed so there is a better understanding of legislation. Please detail why you must have this information and can't get it anywhere else.**

**Why the emphasis on remote students? It is unclear if in person and FRL do they still qualify? They have to be in a remote or quarantined situation, and this needs to be made clearer in the document. This may help make other data requests in the submission clearer. In person student information is needed in case they are exposed to an outbreak, already having the demographic information will help avoid future collections if they are exposed later on.**

**Collecting from the previous semester means there will be no changes so why include the extra data burden? CDE thought this would reduce data burden since the information would already be on hand in case the student is exposed to an outbreak.**

**Question on field 24:**

**FRPL Eligibility date is optional however it is helpful to use the data in collection as much as possible. CDE is unaware of any other place this data is collection. Districts don't collect a date for this information since FRL is determined for the school year. The date is not usually collected so the data that CDE may get on this field will be inaccurate. The field was made optional based on the feedback from facilitated district discussions. If it can be provided - fantastic, if not, CDE will make it work.**

**On fields 25 - 31. Three different paths provided based on feedback from districts. More specificity is being required by Federal program. Data for all three options is not being asked for - pick the best one that suits your district.**

**Is this for students that are just saying they are going remote for the whole year, not the quarantine students? Why do we need a month-by-month breakdown? Some districts said they can report on a monthly basis. Some districts said they may have students flexing between remote and in person, and the thought was the option to delineate this month by month. In training, please make absolutely clear what is optional and what is not. The massive file layout is causing concern from data reporting people on what they must report.**

Is the data detail needed to fulfill legislative requirement? Yes, the USDA guidance will not allow the assumption of a full year remote student.

Make it abundantly clear what needs to be filled out - IE if you select 1 here, you need to fill out x and y.

On Fields 40 - 46

Concerns on excused absence indicator? Definition of excused absence refers to a full day (which means more than half the day). USDA required a confirmation of an excused absence during the period of the outbreak.

Can we get this data from other collections? Cannot get from attendance snapshot since it is an end of year collection.

Absence reason is not required - just whether there is an excused absence. Data will be used if a student had an excused absence during a reported outbreak at school, they would be eligible for benefit.

Is collection going to May, but there are schools in session into June. School year isn't considered into June - this would go into summer benefit. If there are enough schools to impact average, it will be considered.

Add addendum to note what the USDA is adding as a requirement to this data submission - to make sure districts know that CDE is trying to make this as easy as possible for the districts.

Conclusion: Approved with recommended changes:

- Changed to Required to Obtain Benefit.
- Please ensure that it is clear that universe data is optional, and that selective / filtered submission is OK.
  - For example – perhaps changing “add all students” to “add students as a solution.
  - A note to indicate that it is preferred to have all students but LEA’s have the option to selectively submit.
- Please make clearer that the students must be in a remote or quarantined situation and that in person does not qualify.
- Please make clear in training that it is three separate options (concern related to fields starting at field 26).

Ensure clarity on what is optional and what is not; what needs to be filled out if a certain option is selected and what can be skipped.

- Please consider adding addendum indicating what is required due to new USDA guidelines, which will help districts know that CDE is doing its best to reduce data burden.

01/13/2022 1:00 p.m. – 1:50 p.m.	Graduation Guidelines Discussion	Andy Tucker, Kady Lanoha, Danielle Ongart, Marie Huchton, Robin Russel, Reagan Ward
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- Discussion:
  - The purpose of the collection as presented to EDAC in April of 2021 is stated in DMC-106, “The purpose of the Graduation Guidelines file is to record a student’s graduation guidelines measures.” Has the department changed the purpose of this collection since it was last approved by EDAC? Is it for recording or for validating or for calculation of the accountability measure?
    - The file was used to record/validate last in 2020-21, the purpose didn't change in 21-22. There was some discussion that the verbiage and related dialogue may come down to semantics. We've been using it as a cross check until accountability begins to use it for the higher bar.
  - Here is the Higher bar as provided by the Deputy Commissioner to PPRSAC.

Measure	Proposed PWR Endorsed Diploma Criteria - <u>English</u>	Proposed PWR Endorsed Diploma Criteria - <u>Math</u>
ACCUPLACER	80 Reading <i>or</i> 95 Sentence Skills	85 Elementary Algebra
ACT	18	22
ACT Work Keys	Silver	
AP	3	3
ASVAB	50 AFQT	
Concurrent Enrollment	Passing grade of C or higher in credit bearing college level course	Passing grade of C or higher in credit bearing college level course
IB	4	4
SAT	480	530

The list above is exhaustive. Why is the department collecting data on capstones or performance assessments?

- In the Graduation Guidelines Reporting Introduction Nov. 2021 Recording, the presenter stated, “We use it in conjunction with the Student End of Year collection, ..., so it’s a validation check meaning any student at student end of year who has exit type 90, so they’ve graduated, will be cross checked with the graduation guidelines on file to make sure that the students have one English measure and one math measure.” (time code 6:30) Slide 9 specifically states, “Graduation Guidelines is incorporated into the Student End of Year Collection as a Validation Check for Exit Type = 90.” Responses from the department in November of 2021 validate that the purpose of the collection is validation. “The graduation guidelines file is needed to validate students marked Exit = 90 (graduate with regular diploma) have met graduation guidelines in at least one measure in Reading, Writing and Communicating (English), and one measure in mathematics (Math).” It would seem the department is using this collection to validate graduates rather than calculate the higher bar? Is this true?
  - A single data point can serve multiple purposes- both accountability calculations and graduation requirement validation. The previous presentations to EDAC have primarily come from the CDE's Data Services Unit, so we apologize if the full context required for accountability calculations and reporting has not been presented.
- The legislative statute that has necessitated the collection of this data comes from CRS 22-11-204. This law established the mandate to calculate the Post-Secondary Workforce Readiness Demonstrations for use in school and district accountability frameworks. (Sometimes referred to as the “higher bar” measure). Therefore, should this collection be limited to the data necessary to calculate that measure? If not, why not?
- The name and description of the collection does not clearly communicate the purpose of the data being submitted by LEAs. This is not the “Graduation Guidelines” submission. This is the Post-Secondary Workforce Readiness Demonstrations collection. At this time, there is significant confusion about the purpose of this collection. By clarifying the purpose of this collection and renaming this collection, the department will support LEAs in completing the data submission. Will the department clarify the actual purpose of this collection to superintendents? Will the department consider changing the name?
- What does EDAC want to see as next steps?
  - Eric wants to know what is the least that we can collect and still meet statutory authority?
  - Pathway to the future
  - Original view of GG was for us to know if students have the skills, what do we see as the big picture?
  - How is the additional data helpful to us? EDAC members feel that CDE won't respond until they hear from superintendents.
  - What is the least the department can collect for higher bar to meet the limit of the law? What is the departments vision of that?
  - What could reduce this data burden for the future? The original intent was that high school students had a certain set of skills and proficiencies to be successful. From a big picture

standpoint is it really just about do kids meet the bar, how is the additional data helpful to us?  
This may reduce the burden if these items can be trimmed.

- Clarification of justification
- What can be done to reduce data burden to bare minimum?
- Shared Re-Envision process
- Sed's Comments
  - Make the submission voluntary for research purposes
  - People submit low quality data to jump through a hoop, if voluntary we would get higher quality data
  - Cherry Creek and Jeffco said the human burden is on kids and counselors, Jeffco renegotiated the contract
- Eric's motion
  - Since the purpose of the collection has changed from what was communicated to EDAC and districts
  - Patrick - what would the consequences be to removing the stamp?
  - Jan's compromise - have subject matter experts bring the revised paperwork to the February EDAC meeting and show that the purpose(s) of the data collection would be updated. EDAC agreed.
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**Conclusion: Bring updated information and documentation to February EDAC meeting. Look into starting re-envision process.**



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# Overview of Graduation Guidelines Data Collection

January 2022

## Goals for Today

- Respond to EDAC's request for a review of the graduation guidelines reporting file and the history of prior approval
- Provide clarity around decisions that are final and what decisions are open for discussion
- Ground in the legislative authority for this data collection and history of approval
- Hear from all EDAC members about the impact of this collection
- Decide whether a shared reenvision process should be initiated for the 2023-24 graduation guidelines collection

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## Decisions and Discussion Items

### Finalized:

- 2021-22 data files and reporting requirements

### Outside of EDAC Authority:

- State Board of Education timeline for full implementation of graduation guidelines, including the incorporation of the "local measure" option

### For Discussion

- Ways to support districts with 2021-22 reporting and beyond
- EDAC's Shared Re-envision Process for future years' graduation guidelines collections

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## EDAC's Shared Re-envision Process

- In 2018-19, CDE and EDAC initiated a process to provide detailed recommendations to CDE decision makers when a data collection is:
  - Not approved as result of perceived lack of district value, or
  - Likely not to be approved in the coming year for identified reasons.
- Once identified, CDE business experts and data coordinators review the following and bring to EDAC:
  - Statutory impacts and requirements,
  - Downstream impacts of changing data collected,
  - Other potential collections that may potentially collect the minimal required data,
  - Policy implications of changes
- With that info as a starting point, EDAC members work collaboratively with CDE business experts to recommend collection improvements.
- This process can take many meetings and considerable thought and research to come to an acceptable conclusion for all parties.

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## Example of EDAC's Shared Re-envision Process

- In 2019-20, Report Card March was reduced by 43 percent or 23 fields and the Teacher Student Data Link was trimmed to one file instead of three and was reduced from 36 to 25 fields or 31 percent.
- EDAC is currently involved in the shared re-envision process with the Unified Improvement Plan process.

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## Stakeholder Questions

- Concerns that the Graduation Guidelines collection for 2021-22 is an undue burden for some districts dealing with the current COVID-19 pandemic.
- Questions about CDE's statutory authority to require districts to submit student scores on the demonstration options to identify students meeting minimum graduation requirements or the higher achievement bar.
- Given the challenges of the COVID-19 pandemic, districts question whether they should be able to report "local measure" for at least another year.

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## Calculation and Reporting Overview

- Statute requires CDE to calculate and report for accountability the percent of students who graduate, based on meeting the minimum demonstration options established by the stateboard
- Statute also requires CDE to calculate and report for accountability the percent of students who meet or exceed a higher achievement bar, based on cutpoints established by the state board
- CDE has attempted to apply the least burdensome method for gathering the data needed for accountability calculations
- CDE and EDAC have partnered in establishing this data collection which has resulted in EDAC approval

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## Authority for Data Collection - SBE Must Set Postsecondary & Workforce Readiness Cut -Points

- Each board of education must establish local high school graduation requirements that “**meet or exceed any minimum standards**” or core competencies or skills identified in the guidelines for high school graduation requirements developed by the state board pursuant to section 22-2-106(1)(a.5)” C.R.S. 22-32-109(1)(kk)
- “For each of the demonstration options by which a high school student may demonstrate college and career readiness, as recommended by the state board in the high school graduation guidelines adopted pursuant to section 22-2-106 (1)(a.5), **the state board shall adopt achievement standards** that indicate that a student has demonstrated a level of college and career readiness sufficient for high school graduation and higher achievement standards that indicate that a student is prepared, without needing remediation, to enroll in general education core courses.” C.R.S. 22-11-104(2)(a)

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## Authority for Data Collection - CDE Must Collect Data Related to Cut -Points

- “For each public school, **the department shall calculate..(III)(A) The graduation and dropout rates** as defined by rule of the state board [and]...(V) the percentage of students enrolled in the public high school who demonstrate college and career readiness, based on the demonstration options available to the students enrolled in the public high school, **at the higher achievement level adopted by the state board** that indicates a student is prepared, without needing remediation to enroll in general education core courses’ C.R.S. 22-11-204(4)(a)
- “Each school district shall annually report to the department for each of the district public schools: (a) **Any information necessary** to prepare the [school accountability] performance reports...and (e) any information required for the department to implement the accreditation process described in part 2 of this article 11. C.R.S. 22-11-504(1)

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## Least Burdensome Method for Collecting Necessary Data

- By collecting individual scores for demonstration options, CDE does the work to apply the cutscores and calculate whether:
  - 1) Individuals have met the minimum state graduation guidelines; and
  - 2) Individuals have met the higher achievement bar identified by SBE.
- Districts need to submit only one data point (rather than two) per student.
- CDE reviews statewide historical data submissions to ensure students receive credit for meeting the higher achievement bar at any point during their high school careers.
- CDE calculates and reports the disaggregated results to simplify the process for districts.

Note: CDE plans to use data from the Spring 2022 graduation guidelines collection to implement the PWR higher bar metric for Fall 2023 performance frameworks (for informational purposes) and the Fall 2024 performance frameworks (for points).

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## DMC-106 Graduation Guidelines - Student Interchange File History

- March 16, 2018: Graduation Guidelines (GG) file first comes to EDAC for initial review as an addition to the student interchange (DMC 106).
  - EDAC approves file for 2019-2020 school year.
  - 2019-2020 this is an optional file for districts to pilot
- February 7, 2020: EDAC review of student interchange, including GG file
- April 3, 2020: GG file returns to EDAC for continued discussion.
  - EDAC approves GG file as a mandatory collection for 2020-2021 school year.
- September 4, 2020: EDAC reviews GG file layout additions in response to State Board of Education meeting in July 2020.
  - Local Measure added by State Board of Education for the Spring 2021 4 year graduates.
- October 2, 2020: EDAC approves final layout updates of 2020-2021 graduation guidelines.

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## DMC-106 Graduation Guidelines - Student Interchange File History

- March 19, 2021: Student interchange (DMC -106) reviewed at EDAC
  - Student demographics and graduation guidelines files approved
  - File update: Local Measure removed for 21 -22 and beyond per State Board of Education
- April 9, 2021: DMC-106 returned to EDAC
  - Student School Association file approved.
  - Graduation Guidelines not discussed due to prior approval
- June 4, 2021: EDAC was apprised of updates to accepted score values for the existing measures, ACT WorkKeys and Accuplacer.
  - File Update: ACT WorkKeys scale includes maximum score of 7 and Accuplacer includes math measure AAF.
  - Meeting minutes indicate Jan informed EDAC that these updates in response to vendor changes did not need EDAC approval.
- September 3, 2021: EDAC approved change of the acronym for the existing measure Industry Certificate from 'CRT' to 'IC.'
- November/December 2021: EDAC requests further discussion and clarification of the graduation guidelines file requirements

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## 2021–2022 Student Interchange files

- DMC-106 approved by EDAC April 2021 for the 2021-22 school year
- 2021-22 Student Interchange Files
  - Graduation Guidelines
  - Student Demographics
  - Student School Association
- Opened July 2021 for the 2021-22 school year
- 58 districts have submitted 2021-22 GG files as of 1/12/2022
- Student interchange closes December 2022 along with the finalization of the Student End of Year collection

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## How will the data be used?

- Informing next steps internally and with the Assessment Work Group
  - Data informs the question, “How effective are these measures at predicting postsecondary and workforce readiness for all students and for students in different student groups?”
- Evaluating whether graduation guidelines provide multiple “equally rigorous” pathways
- Connecting with Student End of Year collection as a crosscheck for students exiting with code 90 (graduating with regular diploma)
- Establishing the higher achievement bar metric, planned to be included in the school and district performance frameworks first for informational purpose (2023) and later for points (2024)

