

Minutes

cde



Colorado Department of Education EDAC Committee

November 5, 2021
9:30 a.m.-1:00 p.m.
Virtual Meeting

Meeting called by:

Educational Data Advisory Committee

Type of meeting:

Scheduled Data Review Meeting

Facilitator:

Annette Severson

Note taker:

Peter Hoffman

Attendees:

Janice Cook	Lazlo Hunt
Eric Clinton Mason	Mimi Livermore
Patrick Mount	Mina Parthasarathy
Andrew Pippin	
CDE:	
Annette Severson	Marcia Bohannon
Peter Hoffman	

Agenda topics

General Business

- 9:30 – 10:30 OSA Audit with Greg Fugate and Monica Gribben

January time frame - 15 1-hour sessions – There will be a 1-hour session with each district that is selected.

What level staff are they meeting with? Targeting someone who is knowledgeable about interventions. Could be district or school level - district can point HumRRO in best direction i.e. - best school or best person.

Data sharing agreement - No PII in interviews - likely no agreement with each district. Intent not to request PII type data from districts.

EDAC wants to make sure we are not doubling up on other audits that districts are having to do. CDE needs to look at the results and coordinate with other monitoring that CDE is doing.

ESSER grants monitoring goes from now through 2024.

School focus groups - is 1 hour enough for saturation? May be closer to 2 hours? 6-8 people per focus group. Set expectations correctly up front. Set realistic timeline so people respect the results of the focus group.

Questions should be ready by the end of the year - Data sharing agreement shouldn't be needed to conduct interviews and focus groups. January - May data collection

January - April testing is going on - concern of districts being too busy.

Audit must be completed by November 2022

Time limit and length on Teacher / School / Parent Surveys? Limit to 10-15 minutes, which already is challenging. People are tired of surveys. Limit to multiple choice (No open text or very minimal).

Communication needs to be sent to districts to let them know it is coming. What is the plan?

There will be better luck if pushed to June.

While the State recognizes that it may be a burden – this will not be a mandatory audit for the district, and it is recognized that districts may not participate, and other plans will be pursued to complete the audit. The genesis and original ask for this audit were from districts, and they wanted the accountability and assessment system audited.

Continue conversation and have check in at December EDAC meeting would be preferred.

- Meeting Minutes October 1, 2021 - Approved
- ESL-405A CO Services for Children and Youth with Combined Vision and Hearing Loss – October Emergency Review (Approved 10/5/2021)
- NU-154 P-EBT Planning Survey – October Emergency Review (Approved 10/13/2021)
- PWR-102 Concurrent Enrollment Expansion and Innovation Grant Program Emergency Review (Approved 10/19/2021)
- HAW-105 Menstrual Hygiene Products Emergency Review (Approved 10/19/2021)
- Tentatively Scheduled December Collections – No concerns
- Late Item Submissions (MARKED IN RED)
- EDAC Credit Renewal
- Data Pipeline Advisory Committee
- 2020-21 Annual Report – Going before the State Board.
- Request for Government Data Advisory Board (GDAB) Membership
- Graduation Guidelines Collection Discussion

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

- CGA-134B Expelled and At-Risk Student Services Grant - Exit Interviews
- CGA-158 Comprehensive Early Literacy Grant
- CGA-162 Early Literacy Assessment Tool Project (ELAT)
- DMC-112 Data Pipeline Colorado ACCESS for ELLs SBD
- DMC-134 Selection of Accountability Measures for Alternative Education Campuses/School Performance Framework
- DMC-135 Application for Designation as an Alternative Education Campus (AEC)
- DPSE-126 Colorado Student Re-Engagement Grant Program
- OFP-144 Program Requirements for ESEA and ESSER Monitoring
- OPR-104 High School Innovative Learning Opportunities Pilot Program
- PPS-103 ASCENT Program Intent to Participate Form
- Fall Biennial Submissions – **All Approved**
 - OFP-111 – Title I, Part A Non-Public School

- OFP-125 – Comparability
- OFP-143 – Supplement, Not Supplant Demonstration Under Title I, Part A of the Every Student Succeeds Act
- SED-202A - Application for In Administrative Unit High-Cost Reimbursement
- SED-202B Application for Out of District (OOD) High-Cost Student Reimbursement

Colorado State Board of Education Rules – None Pulled

Scheduled for rulemaking hearings in November:

- 1 CCR 301-37, Rules for the Administration of the Educator Licensing Act of 1991
- 1 CCR 301-113, Rules for the Administration of the Educator Recruitment and Retention Program

Notices of Rulemaking:

- 1 CCR 301-43, Rules for the Administration of the Expelled and At-Risk Student Services Grant Program
- 1 CCR 301-68, Rules for the Administration of Medications
- 1 CCR 301-88 Standards for Charter Schools and Charter School Authorizers

25 Minutes	SOC-106 Blended Learning and Supplemental Online Course Variance Waiver Request (New)	Bill Kottenstette
<p>Overview: Districts and schools that have requested the variance waiver have done so because they wish to offer instructional models that fall outside the updated CDE guidance for blended learning and supplemental online courses for students who attend brick-and-mortar schools. Districts and schools seek to (a) offer more of these courses than CDE guidance permits, (b) offer less synchronous instruction for these courses than CDE guidance permits, or (c) both. Districts and schools that are granted the variance waiver will be able to receive funding for students accessing these instructional models, even though those models are not in compliance with current CDE guidance.</p>		
<p>Discussion: EDAC committee believes it should be voluntary.</p> <p>Primary student level data is related to programs? Can this information be gained in any other way? Currently no way to access this data currently.</p> <p>What is the action to take with this collection? Primary purpose is to have the information on file for the audit team. When they conduct audits later, they will have the records of the students participating in the variance waiver to determine whether or not a student is a part of the variance or not.</p> <p>What is the mandate for validation? This hasn't been the established. Based on feedback received - to receive waiver of funding requirements they would like this data ahead of time to help establish eligibility for this waiver.</p> <p>Feels like data burden that the district or school could take care of and have the data available - does it need to be a collection?</p> <p>Suggestion - If schools or districts can submit the variance waiver - should spreadsheet form be formatted similarly so that there is a space for the school. Put school identifier below District Code / District name area.</p> <p>School Finance Act of 1994 is what is used to determine funding. When auditing districts for funding they must show that students have met enrollment guidelines. Online can only be taken through an approved online program. This student level data is important because if a student is submitted for funding, but don't meet the guidelines, the waiver ensures that the district can still get funding for these students.</p> <p>EDAC acknowledges that districts need to maintain this information - but why should districts have to submit this information before the audit happens. Districts were told that if they want the variance waiver - that this would be something they would have to submit this.</p>		
<p>Conclusion: Approved</p> <p>Dr. Eric Clinton Mason Opposed</p>		
5 Minutes	DMC-122A Student Registration/Personal Needs Profile Field Definitions Administration CMAS	Jasmine Carey
<p>Overview: This collection serves as the pre-identification/label collection for CMAS (all content areas) and CoAlt science assessments. CDE pulls student demographic data from CDE's student interchange and uploads it to the PearsonAccessNext portal. Using the Pearson portal, districts have the opportunity to update student demographic information before testing and to pre-code additional testing details such as information about the accommodations a student needs in order to access the assessment. These data are used to populate the Student Biographical Data (SBD) review and are used in state and federal reports by many departments across CDE (e.g., Assessment Unit and Accountability and Data Analysis Unit). Reports that use the data include EdFacts Reports and District and School Performance Frameworks. The data are also reported on the CDE website on the Assessment Division webpage, School View, and CEDAR. These data are also used in assessment reports (e.g., school-, district-, and student-level reports) that are created by CDE and the assessment vendor and provided to districts and schools.</p>		
<p>Discussion: EDAC committee thinks that it is going smoother each year and appreciate the changes that are made toward making it easier and reducing burden on districts.</p>		
<p>Conclusion: Approved</p>		

10 Minutes	CGA-228B Fidelity Measures for the School Health Professional Grant (SHPG) (New)	Mario Rivera
<ul style="list-style-type: none"> Overview: The Fidelity Measures for the SHPG is a condensed version of the School-Wide Positive Behavioral Interventions and Supports (SWPBIS) Tiered Fidelity Inventory. From the data grantees will see what features of evidence-based implementation they can improve upon. The Governor’s Office of Planning and Budgeting and the SHPG team at CDE are interested in using the information obtained from the participating schools and districts to measure program implementation that may lead to program and policy improvements, thereby potentially improving the well-being of students and their academic success. 		
<p>Discussion: Will any questions alter funding received? It will have no impact on funding - focus is on giving grantees information to improve programs. It may increase the presence grantees have since they can use this information to implement work plans to illustrate what features they may be working on.</p>		
<p>Conclusion: Approved</p>		

20 Minutes

DMC-116B READ Teacher Training Reporting
(New)

Whitney Hutton and
Anji Gallanos

Overview: Colorado school districts are required to ensure all K-3 educators who teach reading complete evidence-based training in teaching reading because of changes to the Colorado READ Act in SB 19-199. For the 2022-23 budget year and budget years thereafter, LEPs must submit evidence that it is following the teacher training requirements to receive READ Act funding. In order to fulfill this statutory requirement, a new file upload will be added to the existing READ Data Pipeline collection. Reporting on completion of READ training pathways by all applicable educators is mandated as part of the requirements to receive READ Act funding, starting in the 2022-23 school year.

Discussion:

- **Timeline same for future years? 1st year will be massive - upcoming years will be less burdensome since teachers only need to complete training one time. Less teachers each year.**
- **Could this detail be included in HR? Original plan was to include in HR data collection - however with August extension it creates a timing issue to avoid delay in funding.**
- **What is the least amount a district can submit and still receive funding data wise? K-3 that teach reading are the only teachers reporting, and what pathway they completed.**
- **Is the pathway required in legislation, and if so which section of the law? Need the section / statutory requirement that specifies the pathway information requirement. EDAC committee concerned that the collection is not exceeding the mandate. They understand the need to submit the number of teachers / teachers that met the requirements - the "how" is what is becoming burdensome to districts. Often because it requires teachers to voluntarily submit this information which requires a large variety of twists and turns in trying to get this data from different sources. Is it a statutory requirement to include the pathway, or is it just a requirement to submit that they completed the training?**
- **CDE requires teachers submit information to COOL system. Districts can pull report from COOL system. EDAC committee then wonders why CDE can't pull the information from this report to reduce data burden on districts? Concern that when teachers oversee timing it becomes messy.**
- **Yes or no (did they complete the training) is not being seen as a significant data burden - just the requirement on "how".**
- **Is SSN a requirement or could other fields be used to match? SSN is used for tying into licensing. Depends on status of EDID being added to COOL. Not all teachers required to have license - which may be why SSN is a requirement.**
- **Section VI 4b - EDAC committee members concerned that the terms "evidence" is too broad, and to try and not exceed the mandate since districts are already under a significant data burden. Could districts just tell you they passed, not what they took? If it's not needed, it's not wanted since districts are having struggles as is.**
- **EDAC wonders if it could be a voluntary field in the submission instead of required.**
- **EDAC moved to not approve and want see changes and more information on what is truly required, why are the requirements what they are?**
- **What might be worth looking into - If this data is being submitted to COOL by the teachers, why can't it be pulled from that, OR why can't that field in the submission be voluntary?**
- **Addition question from EDAC member via email:**
- **My concerns are why do we need this tracking? It is an additional report which is unnecessary.**

Conclusion: Not Approved – To be brought back to EDAC in December.

7 Minutes	PSF-CC-17 Air Quality Reimbursement Form (New)	Andy Stine
<p>Overview: The form needs to be completed to request and receive reimbursement funding for the Air Quality Improvement grant. The Air Quality Improvement Grant disperses \$700-\$1400 per classroom for the purchase of air filtration systems. This is the simplified reimbursement process to avoid the complex and detailed nature of the building excellence reimbursement forms.</p>		
<p>Discussion:</p> <ul style="list-style-type: none"> • Make the timeframe / time window of eligibility clear • Make sure Explanatory document that is clear - a webpage before the form is fine. • How far back does it look? Funds for after April 1st through fiscal year 		
<p>Conclusion: Approved</p>		

5 Minutes	DMC-119 Data Collection Satisfaction Survey (Review)	Annette Severson
<p>Overview: The data will help tell us in what areas in the data collection works well and what areas need improvement helping us to improve the data collection process for data respondents. The survey questions will not require data respondent to compile any data. No preparation will be required to participate in the survey. The survey will ask questions related to their satisfaction with the recent data collection. The data to be collected via this satisfaction survey is subjective in nature as it is respondent opinions about the collection. Anonymous survey.</p>		
<p>Discussion: Is it sent out after all collections? No - just data services collections</p> <p>Can other CDE offices have a similar survey?</p>		
<p>Conclusion: Approved</p>		

From: Patrick Mount
To: Lazlo Hunt
Cc: Taylor, Cheryl; MASON, ERIC CLINTON; Janice Cook; Mina Parthasarathy; loraine.saffer@seboces.org; Severson, Annette; Cobb, Floyd; Hoffman, Peter; Andrew Pippin; Chris Selle; Mimi Livermore; Hutton, Whitney; Gallanos, Anji; Bohannon, Marcia
Subject: Re: [external] Re: EDAC DMC-116B READ Teacher Training Emergency Review
Date: Friday, December 10, 2021 11:10:36 AM
Attachments: image001.png
image004.png
image005.png
image006.png
image007.png
image011.png
image012.png
image013.png
image014.png
image015.png

It seems both valuable and prudent to share these observations - nicely described by Eric, Cheryl, and Lazlo - with the respective entities that are responsible for the scope creep. What might be the best way(s) to do this in an effective manner?

Patrick

On Fri, Dec 10, 2021 at 10:37 AM Lazlo Hunt <lazlo_hunt@psdr3.k12.co.us> wrote:

I vote aye to the motion to deny
Lazlo Hunt
Director of Student Services
Options School Principal
Federal Programs
Estes Park School District R-3
(970) 586-2361 ext. 3008
lazlo_hunt@psdr3.k12.co.us

On Fri, Dec 10, 2021 at 10:21 AM Taylor, Cheryl <cheryl.taylor@d51schools.org> wrote:

I vote Aye, on the motion to deny.
After talking in depth to all of the people in our district that are involved in this reporting, there is a lot of concern and, for our district, does not even seem doable. The state continues to change, and add, what is required to be reported on. We started collecting "evidence" from our teachers who have completed the training immediately following their completion. Since then, the state continues to change what is required so we continually have to go back to our teachers and gather more and more information from them. Had we known exactly what was going to be required to submit prior to teachers taking the training, we could have collected and reported the data. However, the way it has continued to change, I vote Aye on the motion to deny. There should have been clarity from the beginning what "evidence" is and what will be required to report...not continuously changing.

On Tue, Dec 7, 2021 at 3:49 PM MASON, ERIC CLINTON <ERIC.MASON@d11.org> wrote:

Thank you, Patrick. I think this brings up an important point. The department chose to make this a part of the READ submission for reasons related to the READ Act funding timeline.

If the department chooses to move forward without adopting recommendations to reduce the data reporting requirement and to move the collection to the HR submission, EDAC can recommend the state board amend the rule to ease the burden on LEPs using the form provided. (Education Data Advisory Committee Recommendation Form for the Repeal or Amendment of Statutory and Regulatory Data Reporting Requirements). Just a thought.

CRS 22-2-304 subsection (3)(a) The EDAC shall annually, or more often if necessary, make recommendations to the state board and to the appropriate legislative committees of reference based on the subject matter of the recommendation for the repeal or amendment of statutory and regulatory data reporting requirements that the EDAC has identified as duplicative, obsolete, or inefficient.

<https://www.cde.state.co.us/sites/default/files/documents/cdereval/download/word/edac/recommendationformrepealamendment2010.doc>

Eric Mason, Ph.D.
Director of Assessment
Educational Data and Support Services
Colorado Springs District 11
(719)290-9524

From: Patrick Mount <mount_james@svvsd.org>
Sent: Tuesday, December 7, 2021 2:29:53 PM
To: MASON, ERIC CLINTON <ERIC.MASON@d11.org>
Cc: Janice Cook <janice.cook@jamesirwin.org>; Mina Parthasarathy <mparthasarathy@aurorak12.org>; Loraine Saffer <loraine.saffer@seboces.org>; Severson, Annette <Severson_A@cde.state.co.us>; Cobb, Floyd <Cobb_F@cde.state.co.us>; Hoffman, Peter <Hoffman_p@cde.state.co.us>; Andrew Pippin <apippin@sd27j.net>; Cheryl Taylor <cheryl.taylor@d51schools.org>; Chris Selle <chris.selle@meeker.k12.co.us>; Lazlo Hunt <LAZLO_HUNT@psdr3.k12.co.us>; Mimi Livermore <MIMI.LIVERMORE@adams12.org>; Hutton, Whitney <Hutton_W@cde.state.co.us>; Gallanos, Anji <gallanos_a@cde.state.co.us>; Bohannon, Marcia <Bohannon_M@cde.state.co.us>
Subject: Re: [external] Re: EDAC DMC-116B READ Teacher Training Emergency Review

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I cast my vote as "No" to denying approval.

Rationale: we have engaged in healthy discussion regarding the merits and concerns about this submission, and received considerable feedback. In my experience and reading of our role, we serve as an *Advisory* committee, which allows for a channel to provide feedback and input regarding requested data submissions.

Should EDAC deny approval, the possibility exists that the decision is overruled (thus the submission moves forward without the EDAC stamp), and I believe the Committee could minimize its value as an Advisory Committee for future submissions.

These are my thoughts. I fully appreciate and respect the dialog and opposing opinions.

Respectfully,

Patrick

On Tue, Dec 7, 2021 at 1:44 PM MASON, ERIC CLINTON <ERIC.MASON@d11.org> wrote:
My vote is Aye on the motion to deny.

Eric Mason, Ph.D.
Director of Assessment
Educational Data and Support Services
Colorado Springs District 11
(719)290-9524

From: Janice Cook <janice.cook@jamesirwin.org>
Sent: Tuesday, December 7, 2021 1:40:48 PM
To: Mina Parthasarathy <mparthasarathy@aurorak12.org>; Loraine Saffer <loraine.saffer@seboces.org>
Cc: Severson, Annette <Severson_A@cde.state.co.us>; MASON, ERIC CLINTON <ERIC.MASON@d11.org>; Cobb, Floyd <Cobb_F@cde.state.co.us>; Hoffman, Peter <Hoffman_p@cde.state.co.us>; Andrew Pippin <apippin@sd27j.net>; Cheryl Taylor <cheryl.taylor@d51schools.org>; Chris Selle <chris.selle@meeker.k12.co.us>; Lazlo Hunt <LAZLO_HUNT@psdr3.k12.co.us>; Mimi Livermore <MIMI.LIVERMORE@adams12.org>; Patrick Mount <mount_james@svvsd.org>; Hutton, Whitney <Hutton_W@cde.state.co.us>; Gallanos, Anji <gallanos_a@cde.state.co.us>; Bohannon, Marcia <Bohannon_M@cde.state.co.us>
Subject: RE: EDAC DMC-116B READ Teacher Training Emergency Review

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My vote is also Aye (to **not** approve the submission as submitted).

*Janice Cook
Director of Student Support Services
James Irwin Charter Schools*



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From: Mina Parthasarathy [mailto:mparthasarathy@aurorak12.org]
Sent: Tuesday, December 7, 2021 1:24 PM
To: Loraine Saffer <loraine.saffer@seboces.org>
Cc: Severson, Annette <Severson_A@cde.state.co.us>; MASON, ERIC CLINTON <ERIC.MASON@d11.org>; Cobb, Floyd <Cobb_F@cde.state.co.us>; Hoffman, Peter <Hoffman_p@cde.state.co.us>; Andrew Pippin <apippin@sd27j.net>; Cheryl Taylor <cheryl.taylor@d51schools.org>; Chris Selle <chris.selle@meeker.k12.co.us>; Janice Cook <janice.cook@jamesirwin.org>; Lazlo Hunt <LAZLO_HUNT@psdr3.k12.co.us>; Mimi Livermore <MIMI.LIVERMORE@adams12.org>; Patrick Mount <mount_james@svvsd.org>; Hutton, Whitney <Hutton_W@cde.state.co.us>; Gallanos, Anji <Gallanos_A@cde.state.co.us>; Bohannon, Marcia <Bohannon_M@cde.state.co.us>
Subject: Re: EDAC DMC-116B READ Teacher Training Emergency Review

My vote is a Yay - I am voting that we do not approve this submission, my district also feels that it will be a burden and maybe this could be collected as a part of the HR collection.

Thank you,
Mina S Parthasarathy
Director, Application Services
Information Technology, Aurora Public Schools
82 Airport Blvd,
Aurora, CO 80011
303-326-1985 X 28201

On Tue, Dec 7, 2021 at 12:57 PM Loraine Saffer <loraine.saffer@seboces.org> wrote:

I would second his motion.

Loraine Saffer
Executive Director
Southeastern BOCES
Lamar, CO 81052
719-336-9046 ext. 120

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On Tue, Dec 7, 2021 at 12:51 PM Severson, Annette <Severson_A@cde.state.co.us> wrote:

EDAC Members,

Just to clarify, Eric has presented what we will call a motion to deny. Is there anyone who will second this motion to deny the collection?

If it gets seconded, could each member respond by voting yay or nay to the motion. So a vote of "Yay" means that you are voting against the READ collection as presented, and a vote of "Nay" means that you are voting to approve the collection as presented.

As we discussed at our meeting, we must resolve this and move to next steps by the end of this week. So please respond with your vote no later than noon on Friday, 12/10/21.

Thank you,
Annette

Annette Severson
Manager of Data Services
IMS - Data Services
 **COLORADO**
Department of Education
P 303.866.6824
201 East Colfax Avenue, Room 507, Denver, CO 80203
Severson_A@cde.state.co.us | www.cde.state.co.us



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From: MASON, ERIC CLINTON <ERIC.MASON@d11.org>
Sent: Tuesday, December 7, 2021 10:48 AM
To: Severson, Annette <Severson_A@cde.state.co.us>; Cobb, Floyd <Cobb_F@cde.state.co.us>; loraine.saffer@seboces.org
Cc: Mina Parthasarathy <mssparthasarathy@aurorak12.org>; Hoffman, Peter <Hoffman_p@cde.state.co.us>; Andrew Pippin <apippin@sd27j.net>; Cheryl Taylor <cheryl.taylor@d51schools.org>; Chris Selle <chris.selle@meeker.k12.co.us>; Janice Cook <janice.cook@jamesirwin.org>; Lazlo Hunt <LAZLO_HUNT@PSDR3.K12.CO.US>; Mimi Livermore <MIMI.LIVERMORE@ADAMS12.ORG>; Patrick Mount <mount_james@svvsd.org>; Hutton, Whitney <Hutton_W@cde.state.co.us>; Gallanos, Anji <Gallanos_A@cde.state.co.us>; Bohannon, Marcia <Bohannon_M@cde.state.co.us>
Subject: Re: EDAC DMC-116B READ Teacher Training Emergency Review

Thank you for your and explanation of the role of EDAC in advising the Department. This is very helpful. I completely understand the general unwillingness to bother the AG with opinions except in unusual circumstances. I also understand the need for timeliness in this collection especially related to the statute timelines regarding READ Act funding.

I did not see an informal response from the AG as there was no signatory. I did not realize that the quoted text was from the AG's informal response. I was also unclear about the meaning of the term "mere assurance" in the text sent by Executive Director Cobb. As that has yet to be explained, I am still unclear about the reasoning for requiring the pathway in the collection.

As laid out in the recommendation, the statute and board rule use the term "evidence" which can be defined as "assertions of fact" as opposed to "material items." I would recommend that the department accept the recommendation. If the department maintains that that the "assertions of fact" must contain the details of the teacher assessment pathway in order to meet the letter of the statute, I would disagree with that conclusion.

As Pikes Peak Representative, I must respectfully vote against the collection as currently presented for the following reasons:

1. Multiple districts in the Pikes Peak region have expressed concerns that this collection is a burden as presented.
2. Several districts have expressed that this collection is best situated as an HR collection rather than as a part of the READ submission.
3. It is the LEPs responsibility to verify the teacher status, not the department.
4. The LEP can satisfy the requirements of statute and rule by submitting the training status of the teacher as is done for other requirements without submitting the pathway.
5. The collection is inefficient as presented and goes beyond the mandate of statute.
6. The department has no regulatory authority to verify the teacher training status. Both statute and rule nominate the LEP for this task.
7. The department has presented no value to LEPs by demonstrating a research approach to benefit LEP processes or reduced expenditures utilizing the teacher pathway data.
8. EDACs statutory responsibility is to advise the department on collections that are inefficient and to recommend changes that reduce inefficiency.

I would recommend the department change the following fields to voluntary or remove them from the collection:

- Staff's Teacher Training Status Code
- Teacher Training completion status
- Staff's Teacher Training Not Complete Narrative

I would recommend the department add the following required field:

- Staff's Teacher Training Status (1- Teacher completed end-of-course assessment at the completion of the evidence-based training, 0-completion not yet verified)

These changes would limit the burden on districts in a very challenging year, saving taxpayers money in lost staff time, and making the collection more efficient by limiting the data collected to the exact specifications of statute and rule. Making these changes to the collection should be a very quick process and will not cause any disruption to LEPs. I have spoken directly to those involved in the collection for Colorado Springs District 11, and those staff have agreed that making this change would benefit the district.

Of course, I understand if other members disagree. I have been honored to be a part of the process of serving districts. Thank for the opportunity to voice the concerns of the Pikes Peak region.

Respectfully,

Eric C. Mason, Ph.D.

EDAC Pikes Peak Representative

Director of Assessment

Education Insights

Colorado Springs District 11

(719)520-2414

From: Severson, Annette <Severson_A@cde.state.co.us>

Sent: Tuesday, December 7, 2021 9:56 AM

To: MASON, ERIC CLINTON <ERIC.MASON@d11.org>; Cobb, Floyd <Cobb_F@cde.state.co.us>; loraine.saffer@seboces.org <loraine.saffer@seboces.org>

Cc: Mina Parthasarathy <mparthasarathy@aurorak12.org>; Hoffman, Peter <Hoffman_p@cde.state.co.us>; Andrew Pippin <apippin@sd27j.net>; Cheryl Taylor <cheryl.taylor@d51schools.org>; Chris Selle <chris.selle@meeker.k12.co.us>; Janice Cook <janice.cook@jamesirwin.org>; Lazlo Hunt <LAZLO_HUNT@PSDR3.K12.CO.US>; Mimi Livermore <MIMI.LIVERMORE@ADAMS12.ORG>; Patrick Mount <mount_james@svvsd.org>; Hutton, Whitney <Hutton_W@cde.state.co.us>; Gallanos, Anji <gallanos_a@cde.state.co.us>; Bohannon, Marcia <Bohannon_M@cde.state.co.us>

Subject: RE: EDAC DMC-116B READ Teacher Training Emergency Review

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Good morning EDAC members,

Thank you Eric for your passion in this matter. CDE appreciates the energy you have displayed as a new member.

The purpose of this email is to offer information about the viability of your request to obtain a formal AG opinion. Per statute (24-31-101(1)(d) and listed below for reference), EDAC is prohibited from requesting a Formal Attorney General Opinion. Commissioner Anthes is the only person who can request this type of review, and she rarely uses that option. Floyd already provided the informal feedback from the AG's office, so we ask that EDAC members consider that in lieu of a formal opinion.

EDAC has shown to be most effective when working collaboratively with CDE to resolve challenging situations. As an example, EDAC rightly pointed out the inadvisability of collecting SSN in the READ training collection. CDE should have caught that but didn't. By taking the advice of EDAC and looking into that further, CDE agreed with EDAC and removed that data element from the collection requirement. This is a great example of how EDAC and CDE can work together to improve a collection. Unfortunately, it's not always this easy.

Commissioner Anthes has visited EDAC from time to time in the past, reminding EDAC of its status as an advisory committee, and that CDE has requirements placed upon it by statute, by the state board, and by other education policy entities. For this reason, it's not always a clear-cut decision on whether to collect certain data. The READ training collection happens to be very important to our state board. Because of this, there is very little if any wiggle room in the collection as laid out. We ask that EDAC keep this, and their role, in mind when voting for this collection.

We hope this helps to explain the situation more fully.

This email will be immediately followed by a request to vote on the collection so we may move forward with next steps.

Thank you for your engagement in this discussion

This is the statute that governs Formal Attorney General Opinions (24-31-101(1)(d)):

(1) The attorney general:

(a) Shall act as the chief legal representative of the state and be the legal counsel and advisor of each department, division, office, board, commission, bureau, and agency of state government but shall not provide legal counsel to the legislative branch except for the state auditor in accordance with [section 2-3-104.5](#):

(b) Shall appear for the state and prosecute and defend all actions and proceedings, civil and criminal, in which the state is a party or is interested when required to do so by the governor;

(c) Shall prosecute and defend for the state all causes in the appellate courts in which the state is a party or is interested;

(d) Shall give his or her opinion in writing upon all questions of law submitted to the attorney general by the:

(I) General assembly, or either the house of representatives or the senate;

(II) Governor;

(III) Lieutenant governor;

(IV) Secretary of state;

(V) State treasurer;

(VI) Executive director of the department of revenue; or

(VII) Commissioner of education.

Annette Severson
Manager of Data Services
IMS - Data Services



COLORADO
Department of Education

P 303.866.6824
201 East Colfax Avenue, Room 507, Denver, CO 80203
Severson_A@cde.state.co.us | www.cde.state.co.us



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From: MASON, ERIC CLINTON <ERIC.MASON@d11.org>
Sent: Monday, December 6, 2021 12:49 PM
To: Cobb, Floyd <Cobb_F@cde.state.co.us>; loraine.saffer@seboces.org
Cc: Mina Parthasarathy <mparthasarathy@aurorak12.org>; Hoffman, Peter <Hoffman_p@cde.state.co.us>; Andrew Pippin <apippin@sd27j.net>; Cheryl Taylor <cheryl.taylor@d51schools.org>; Chris Selle <chris.selle@meeker.k12.co.us>; Janice Cook <janice.cook@jamesirwin.org>; Lazlo Hunt <LAZLO_HUNT@PSDR3.K12.CO.US>; Mimi Livermore <MIMI.LIVERMORE@ADAMS12.ORG>; Patrick Mount <mount_james@svvsd.org>; Severson, Annette <Severson_A@cde.state.co.us>; Hutton, Whitney <Hutton_W@cde.state.co.us>; Gallanos, Anji <Gallanos_A@cde.state.co.us>; Bohannon, Marcia <Bohannon_M@cde.state.co.us>
Subject: Re: EDAC DMC-116B READ Teacher Training Emergency Review

Good morning,

I want to thank the department for their willingness to consider a reduction in the burden on LEPs caused by this collection, and I deeply appreciate the time and attention paid to this issue.

I have prepared a recommendation for DMC-116B READ Teacher Training.

If EDAC agrees, I would ask the department to obtain an opinion from the Attorney General regarding the reading of SB Rule 13.01(C)(2) and CRS 22-7-1208 subsections (a) and (b).

For reference, I have attached the recommendation and it is included below as well.

Eric C. Mason, Ph.D.

EDAC Pikes Peak Representative

Director of Assessment

Education Insights

Colorado Springs District 11

(719)520-2414

EDAC Recommendation on State Board Rule 13.01(C)(2) and CRS 22-7-1208 specifically related to department data collection DMC-116B READ Teacher Training

State Board Rule. 13.01(C)(2). (text provided by Department to EDAC)

A teacher is deemed to have successfully completed evidenced-based training in teaching reading if the LEP submits evidence that the teacher:

(a) successfully completed a CDE-provided reading training designed to meet this training requirement and passed the end of course assessment of learning;
or

(b) passed a CDE-approved undergraduate or graduate reading course and passed the end of course assessment of learning; or

(c) passed a CDE-approved district or BOCES reading course or a course appropriate for license renewal and passed the end of course assessment of learning; or

(d) holds a state of Colorado endorsement as a Reading Teacher or Reading Specialist; or

(e) successfully completed a training program included on the department's advisory list of professional development programs created pursuant to C.R.S. §

22-7-1209(2)(c) and passed the end of course assessment of learning.

CRS. 22-7-1208

(6)(a) By the beginning of the 2022-23 school year and continuing for each school year thereafter, each local education provider that receives per-pupil intervention money or a grant through the early literacy grant program in any budget year starting with the 2019-20 budget year shall ensure that each teacher employed to teach kindergarten or any of grades one through three successfully completes or has successfully completed evidence-based training in teaching reading. To comply with this subsection (6)(a), a local education provider must submit evidence, as described in subsection (6)(b) of this section, that each teacher employed to teach kindergarten or any of grades one through three has successfully completed evidence-based training in teaching reading that is:

(I) Included as a course in an approved program of preparation, as defined in section 22-60.5-103(8), or an alternative teacher program, as defined in section 22-60.5-103(5);

(II) Included as a course in a post-graduate degree program in teaching reading or literacy;

(III) Provided by the department or included on the advisory list of professional development programs provided by the department pursuant to section 22-7-1209(2)(c); or

(IV) Provided by a local education provider or is appropriate for license renewal pursuant to section 22-60.5-110(3).

(b) A teacher is deemed to have successfully completed evidence-based training in teaching reading if the local education provider submits to the department evidence that the teacher passed an end-of-course assessment of learning at the completion of the evidence-based training.

(f) The state board may adopt rules as necessary to specify the time frames and procedures for complying with the requirements specified in subsection (6)(a) of this section and for applying for an extension pursuant to subsection (6)(d) of this section and the form in which a local education provider must submit evidence of the completion of an end-of-course assessment of learning as required in subsection (6)(b) of this section.

Definitions:

- evidence: "in law, any of the material items or assertions of fact that may be submitted to a competent tribunal as a means of ascertaining the truth of any alleged matter of fact under investigation before it." (Britannica: <https://www.britannica.com/topic/evidence-law>)
- assertion: "a declaration that something is the case" (Merriam-Webster: <https://www.merriam-webster.com/dictionary/assertion>)
- submit: "to present or propose to another for review, consideration, or decision" (Merriam-Webster: <https://www.merriam-webster.com/dictionary/submit>)
- assure*: "to inform positively" (Merriam-Webster: <https://www.merriam-webster.com/dictionary/assure>)
- assurance*: "the act or action of assuring someone or something" (Merriam-Webster: <https://www.merriam-webster.com/dictionary/assurance>)

Justification: CRS. 22-7-1208 (Justifications in blue)

1. Subsection (6)(a) "each local education provider shall ensure that each teacher ... successfully completes or has successfully completed evidence-based training in teaching reading."
 - a. The LEP is responsible for ensuring that each teacher complete the literacy requirements
2. "To comply with this subsection (6)(a), a local education provider must submit evidence, as described in subsection (6)(b)"
 - a. The evidence that the LEA must submit is described in subsection (6)(b).
3. **Subsection (6)(b)** "A teacher is deemed to have successfully completed evidence-based training in teaching reading if the local education provider submits to the department evidence that the teacher passed an end-of-course assessment of learning at the completion of the evidence-based training."
 - a. The teacher need not submit proof of the training to the CDE in order for the LEP to receive funding. The teacher "is deemed to have successfully completed ...training if the" LEP submits evidence to the CDE.
 - b. The LEP must submit "evidence that the teacher passed an end-of-course assessment of learning at the completion of the evidence-based training," which the CDE has determined amounts to the submission of data in the DMC-116B READ Teacher Training. In the department's opinion, the submission of DMC-116B READ Teacher Training qualifies as evidence and an "assertion of fact." "Evidence" should be defined as "assertions of fact" for the purposes of compliance with the relevant statute.
 - c. The rule does not specify in Subsection (6)(b) the level of detail required for the submission only that the LEP must submit "evidence that the teacher passed an end-of-course assessment." The CDE has made clear that LEPs do NOT need to submit a paper or digital certificate, signed documentation, course lists, or other "material items."
 - d. The CDE has made clear the LEP only needs to submit an "assertion of fact" by marking a field in a data pipeline submission.
 - e. The statute could be viewed to allow that the submission could be an assertion of fact constituted as a yes(1)/no(0) assuring that teachers completed an appropriate "end-of-course assessment of learning at the completion of the evidence-based training." EDAC maintains that this is reasonable and will satisfy the needs of Subsection (6)(b) while limiting the burden on government employees and LEP staff.

Justification: State Board Rule. 13.01(C)(2). (Justifications in blue)

1. "A teacher is deemed to have successfully completed evidenced-based training in teaching reading if the LEP submits evidence that the teacher:"
 - a. The department contends that the evidence that must be submitted is described by the proceeding subsections. EDAC contends

that 13.01(C)(2) does not specify that the details of type of end-of-course must be submitted for the LEP to submit evidence. The LEP can submit "assertions of fact" of completion without providing the details of end-of-course assessment for the following reasons:

- i. The department has no part to play in collecting the details of the end-of-course assessment. The LEP is responsible for collecting and maintaining records of the end-of-course assessment. The LEP then submits assertions of fact to the department that the teacher has completed a relevant end-of-course assessment. Compliance with this submission can be limited to a yes or no regarding teacher completion status.
- ii. The teacher need not submit evidence to the department under the reading of the rule and statute, "A teacher is deemed to have successfully completed evidenced-based training in teaching reading if the LEP submits evidence that the teacher...." Therefore, the department has no responsibility or means to verify the details of the end-of-course assessment. This responsibility is left to the LEP which is a government agency with adjoining fiduciary responsibilities.
- iii. Collection of the details of the end-of-course assessment for DMC-116B READ Teacher Training therefore becomes duplicative and inefficient.

Therefore, the following changes to DMC-116B READ Teacher Training are recommended:

1. Removal of the following required fields:
 - a. Social Security Number
2. Changing the following fields status to voluntary or removed:
 - a. Staff's Teacher Training Status Code
 - b. Teacher Training completion status
 - c. Staff's Teacher Training Not Complete Narrative
3. Addition of the following required field:
 - a. Staff's Teacher Training Status (1= Teacher completed end-of-course assessment at the completion of the evidence-based training, 0=completion not yet verified)

*NOTE: In their response to EDAC, the Department has used the word "assurance" several times. The definition is included for reference.

From: MASON, ERIC CLINTON <ERIC.MASON@d11.org>
Sent: Friday, December 3, 2021 1:28 PM
To: Cobb, Floyd <Cobb_F@cde.state.co.us>; loraine.saffer@seboces.org <loraine.saffer@seboces.org>
Cc: Mina Parthasarathy <mmparthasarathy@aurorak12.org>; Hoffman, Peter <Hoffman_p@cde.state.co.us>; Andrew Pippin <apippin@sd27j.net>; Cheryl Taylor <cheryl.taylor@d51schools.org>; Chris Selle <chris.selle@meeke.k12.co.us>; Janice Cook <janice.cook@jamesirwin.org>; Lazlo Hunt <LAZLO_HUNT@psdr3.k12.co.us>; Mimi Livermore <MIMILIVERMORE@adams12.org>; Patrick Mount <mount_james@svvsd.org>; Severson, Annette <Severson_A@cde.state.co.us>; Hutton, Whitney <Hutton_W@cde.state.co.us>; Gallanos, Anji <gallanos_a@cde.state.co.us>; Bohannon, Marcia <Bohannon_M@cde.state.co.us>
Subject: Re: EDAC DMC-116B READ Teacher Training Emergency Review

Thank you for this information.

This confirms our reading.

1. **"each local education provider shall ensure that each teacher ... successfully completes or has successfully completed evidence-based training in teaching reading."**
 - a. The LEP is responsible for ensuring that each teacher complete the literacy requirements
2. **"To comply with this subsection (6)(a), a local education provider must submit evidence, as described in subsection (6)(b)"**
 - a. The evidence that the LEA must submit is described in subsection (6)(b).
3. **Subsection (6)(b) "A teacher is deemed to have successfully completed evidence-based training in teaching reading if the local education provider submits to the department evidence that the teacher passed an end-of-course assessment of learning at the completion of the evidence-based training."**
 - a. The teacher need not submit proof of the training to the CDE in order for the LEP to receive funding. The teacher "is deemed to have successfully completed ...training if the" LEP submits evidence to the CDE.
 - b. The LEP must submit "evidence that the teacher passed an end-of-course assessment of learning at the completion of the evidence-based training," which the CDE has determined amounts to the submission of individual teacher assurances in the DMC-116B READ Teacher Training.
 - c. The rule does not specify in Subsection (6)(b) the level of detail required for the submission only that the LEP must submit "evidence that the teacher passed an end-of-course assessment." The CDE has made clear that LEPs do NOT need to submit a paper or digital certificate, signed documentation, course lists, or other specific data.
 - d. The CDE has made clear the LEP only needs to submit an assurance of marking a field in a data pipeline submission.
 - e. The rule allows that the submission could be as simple as a yes(1)/no(0) assuring that teachers completed an appropriate "end-of-course assessment of learning at the completion of the evidence-based training."

Therefore, I recommend the following changes to DMC-116B READ Teacher Training.

1. Removal of the following required fields: (Rule indicates that verification of status is not necessary as the LEP submission satisfies the rule.)
 - a. Social Security Number
2. Changing the following fields to voluntary or removed: (Rule does not require in subsection (6)(b) that the submission include the type of pathway used by the LEP to ensure teacher completion.)
 - a. Staff's Teacher Training Status Code
 - b. Teacher Training completion status
 - c. Staff's Teacher Training Not Complete Narrative
3. Addition of the following required field: (Rule requires that LEPs submit evidence. The CDE has established that evidence can be submitted in the form of a data pipeline submission.)
 - a. Staff's Teacher Training Status (1- Teacher completed end-of-course assessment at the completion of the evidence-based training, 0-completion not yet verified)

Thank you for your presentation today, and thank you for doing everything possible to reduce the data burden on districts during this challenging time.

Eric Mason, Ph.D.

Director of Assessment

Educational Data and Support Services

Colorado Springs District 11

(719)290-9524

From: Cobb, Floyd <Cobb_F@cde.state.co.us>
Sent: Friday, December 3, 2021 12:39:53 PM
To: loraine.saffer@seboces.org <loraine.saffer@seboces.org>
Cc: Mina Parthasarathy <mparthasarathy@aurorak12.org>; MASON, ERIC CLINTON <ERIC.MASON@d11.org>; Hoffman, Peter <Hoffman_p@cde.state.co.us>; Andrew Pippin <apippin@sd27j.net>; Cheryl Taylor <cheryl.taylor@d51schools.org>; Chris Selle <chris.selle@meeker.k12.co.us>; Janice Cook <janice.cook@jamesirwin.org>; Lazlo Hunt <LAZLO_HUNT@psdr3.k12.co.us>; Mimi Livermore <MIMILIVERMORE@adams12.org>; Patrick Mount <mount_james@svvsd.org>; Severson, Annette <Severson_A@cde.state.co.us>; Hutton, Whitney <Hutton_W@cde.state.co.us>; Gallanos, Anji <gallanos_a@cde.state.co.us>; Bohannon, Marcia <Bohannon_M@cde.state.co.us>
Subject: RE: EDAC DMC-116B READ Teacher Training Emergency Review

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Good afternoon everyone,

Please find below informal advice including statutory references we have concerning the question raised about an assurance.

Thank you,

We read the statute as specifying that “to comply” with the requirement that teachers have successfully completed evidence-based training in teaching reading, the LEP “must submit evidence” that “each teacher” has completed training in one of four provider contexts (prep program, grad program, CDE provided/approved, through LEP). Then the statute specifies that the “evidence” is proof that the teacher passed an end-of-course assessment. Beyond quoting the rule, you might want to point EDAC to the underlying statutory language:

(6)(a) By the beginning of the 2022-23 school year and continuing for each school year thereafter, each local education provider that receives per-pupil intervention money or a grant through the early literacy grant program in any budget year starting with the 2019-20 budget year shall ensure that each teacher employed to teach kindergarten or any of grades one through three successfully completes or has successfully completed evidence-based training in teaching reading. To comply with this subsection (6)(a), a local education provider must submit evidence, as described in subsection (6)(b) of this section, that each teacher employed to teach kindergarten or any of grades one through three has successfully completed evidence-based training in teaching reading that is:

- (I) Included as a course in an approved program of preparation, as defined in [section 22-60.5-103\(8\)](#), or an alternative teacher program, as defined in [section 22-60.5-103\(5\)](#);

- (II) Included as a course in a post-graduate degree program in teaching reading or literacy;
- (III) Provided by the department or included on the advisory list of professional development programs provided by the department pursuant to [section 22-7-1209\(2\)\(c\)](#); or
- (IV) Provided by a local education provider or is appropriate for license renewal pursuant to [section 22-60.5-110\(3\)](#).

(b) A teacher is deemed to have successfully completed evidence-based training in teaching reading if the local education provider **submits to the department evidence that the teacher passed an end-of-course assessment of learning at the completion of the evidence-based training.**

So, that's why in our view a mere form assurance doesn't satisfy the statutory requirement.

Floyd Cobb, Ph.D.
Executive Director
Teaching & Learning



COLORADO
Department of Education

P 303.866.6868 | C: 303.815.8169
1560 Broadway, Suite 500, Denver, CO 80202
Cobb_F@cde.state.co.us | www.cde.state.co.us
Pronouns: He/him/his



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From: Loraine Saffer <loraine.saffer@seboces.org>

Sent: Tuesday, November 16, 2021 12:46 PM

To: Cobb, Floyd <Cobb_F@cde.state.co.us>

Cc: Mina Parthasarathy <mparthasarathy@aurorak12.org>; MASON, ERIC CLINTON <ERIC.MASON@d11.org>; Hoffman, Peter <Hoffman_p@cde.state.co.us>; Andrew Pippin <apippin@sd27j.net>; Cheryl Taylor <cheryl.taylor@d51schools.org>; Chris Selle <chris.selle@meeker.k12.co.us>; Janice Cook <janice.cook@jamesirwin.org>; Lazlo Hunt <LAZLO_HUNT@psdr3.k12.co.us>; Mimi Livermore <MIMILIVERMORE@adams12.org>; Patrick Mount <mount_james@svvsd.org>; Severson, Annette <Severson_A@cde.state.co.us>; Hutton, Whitney <Hutton_W@cde.state.co.us>; Gallanos, Anji <Gallanos_A@cde.state.co.us>; Bohannon, Marcia <Bohannon_M@cde.state.co.us>

Subject: Re: EDAC DMC-116B READ Teacher Training Emergency Review

I like this plan. Thank you.

Loraine Saffer
Executive Director
Southeastern BOCES
Lamar, CO 81052
719-336-9046 ext. 120

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On Tue, Nov 16, 2021 at 12:43 PM Cobb, Floyd <Cobb_F@cde.state.co.us> wrote:

Good afternoon all,

Due to the continued questions, I think it's perhaps more efficient if we have this conversation at the December meeting. Then I can clarify these points of confusion and show why districts are required to submit in both rule and statute.

Thank you,

Floyd Cobb, Ph.D.
Executive Director
Teaching & Learning



COLORADO
Department of Education

P 303.866.6868 | C: 303.815.8169
1560 Broadway, Suite 500, Denver, CO 80202
Cobb_F@cde.state.co.us | www.cde.state.co.us
Pronouns: He/him/his



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From: Mina Parthasarathy <mparthasarathy@aurorak12.org>

Sent: Thursday, November 11, 2021 8:39 AM

To: MASON, ERIC CLINTON <ERIC.MASON@d11.org>

Cc: Hoffman, Peter <Hoffman_p@cde.state.co.us>; Andrew Pippin <apippin@sd27j.net>; Cheryl Taylor <cheryl.taylor@d51schools.org>; Chris Selle <chris.selle@meecker.k12.co.us>; Janice Cook <janice.cook@jamesirwin.org>; Lazlo Hunt <LAZLO_HUNT@psdr3.k12.co.us>; Loraine Saffer <loraine.saffer@sebooces.org>; Mimi Livermore <MIMILIVERMORE@adams12.org>; Patrick Mount <mount_james@svvsd.org>; Severson, Annette <Severson_A@cde.state.co.us>; Hutton, Whitney <Hutton_W@cde.state.co.us>; Gallanos, Anji <Gallanos_A@cde.state.co.us>; Cobb, Floyd <Cobb_F@cde.state.co.us>

Subject: Re: EDAC DMC-116B READ Teacher Training Emergency Review

I had to jump off the EDAC call when this was discussed, so my apologies if my questions were already addressed:

1. Why does this extract ask for the SSN, CDE should be able to tie back to it with the EDID.
2. How much of this data can be gathered from the CDE HR report and or Randa?

Thank you,

Mina S Parthasarathy

Director, Application Services

Information Technology, Aurora Public Schools

82 Airport Blvd,

Aurora, CO 80011

303-326-1985 X 28201

On Wed, Nov 10, 2021 at 7:06 PM MASON, ERIC CLINTON <ERIC.MASON@d11.org> wrote:

Thank you so much for your response. I deeply appreciate the incredible work the department is doing in another very challenging year for schools and districts. In the last few weeks, Colorado has again entered a phase of the pandemic causing significant disruptions for schools and districts. I feel the topic of additional data burdens to be even more important. Thank you for reviewing EDAC's concerns.

Below are some additional questions I have regarding this data submission. Before that, I wanted to share a quick anecdote.

This week, I had the opportunity to speak with an educator from a larger district who has been tasked with collecting the data for this submission. The educator, who works generally with READ act funds and literacy training for educators in his/her district, detailed for me the extreme challenge of collecting this data for the submission. Since districts were not instructed to do this collection as a part of the HR submission, this educator has been responsible for creating a way to collect the information about this requirement from hundreds of educators. This educator explained to me that more than 40 hours of her time over the last month, including evenings, has been spent creating a way for teachers to upload transcripts, certificates, or other assurances into a secure non-HR online system so that this educator can add this data to the READ submission he/she is usually responsible for. He/she was concerned he/she was seeing details about educators he/she had no business seeing. This educator confirmed it has significantly affected his/her focus on helping educators adjust instruction in response to the pandemic. I share this as an example of the challenge of preparing for this particular data submission.

Based on the initial responses, my vote is to not approve without a change to the data submission removing the submission of individual teacher pathway information as mandatory and instead making it a voluntary field for 21-22.

Further Questions:

1 & 2. Much of the department response seems to hinge on the definition of "evidence." The department contends that the pathway is required for the LEP to submit evidence. The request from EDAC was for the department to explain why the submission of assurance that the teacher completed a pathway was not evidence enough to demonstrate compliance. There is no additional evidence provided by detail, only more detail. The evidence being accepted is the assurance of the district and the notation of a field in a data submission.

Please detail what the department considers "evidence." The state board rule reads, "...if the LEP submits evidence..." It appears that "evidence" is defined as the notation of a data field. It appears the department is trusting the LEP to accurately collect evidence the teacher has completed the requirement. It appears the department is likewise trusting the LEP to confirm the completion of the requirement. Since the department is accepting the LEP submission of a notation in a data field without additional evidence such as a certificate or transcript, why is it not reasonable to allow LEPs to submit assurance through the straight-forward submission that the teacher has completed the requirement without requiring the detail of the pathway? The field in the data submission is submission of evidence. Detailing the pathway provides no additional evidence beyond the notation of a field.

EDAC By Laws Article VII Sections 4 and 5 state,

"Section 4 Costs of collecting, analyzing, and reporting information should be minimal in relation to the benefits to be derived.

Section 5 The requestor should be able to attach a high level of accuracy and confidence to the information to be obtained through the request."

3.The collection is already collecting the social security number of the teacher in this collection (a data requirement that could result in non-HR personnel reviewing this personal data as they also collect the pathway details). The COOL system includes the social security number. The COOL system will also contain the pathway the teacher chose to complete the requirement. The LEP submission will

contain (or could contain) the current grade level of the teacher. By merging these two sources of data, the department can collect the information they need from two sources. Doing so will relieve a significant burden from LEPs in a year that is already creating significant challenges for data collection. The concern was not about the collection in general. The concern is about the collection of the pathway in this data submission. Please demonstrate why the department cannot merge these two data sources together.

EDAC By Laws article VII Section 1 states, "It is the responsibility of the requesting unit to demonstrate why currently existing requested information cannot be used from the other source."

Eric C. Mason, Ph.D.
Director of Assessment
Education Insights
Colorado Springs District 11
(719)520-2414

From: Hoffman, Peter <Hoffman_p@cde.state.co.us>
Sent: Wednesday, November 10, 2021 4:43 PM
To: Andrew Pippin <apippin@sd27j.net>; Cheryl Taylor <cheryl.taylor@d51schools.org>; Chris Selle <chris.selle@meeker.k12.co.us>; MASON, ERIC CLINTON <ERIC.MASON@d11.org>; Janice Cook <janice.cook@jamesirwin.org>; Lazlo Hunt <LAZLO_HUNT@PSDR3.K12.CO.US>; loraine.saffer@seboces.org <loraine.saffer@seboces.org>; Mimi Livermore <MIMILIVERMORE@ADAMS12.ORG>; Mina Parthasarathy <mshparthasarathy@aurorak12.org>; Patrick Mount <mount_james@svvsd.org>
Cc: Severson, Annette <Severson_A@cde.state.co.us>; Hutton, Whitney <Hutton_W@cde.state.co.us>; Gallanos, Anji <Gallanos_A@cde.state.co.us>; Cobb, Floyd <Cobb_F@cde.state.co.us>
Subject: EDAC DMC-116B READ Teacher Training Emergency Review

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EDAC Committee,

At the November EDAC meeting there was a request for additional information prior to voting for the new READ Teacher Training Status collection which was initially planned to occur at the December meeting. However, the P-3 office has expressed concern with waiting until then and wanted to address your questions and hopefully gain approval via email instead. Attached is the EDAC form for the collection and below are the questions raised at the meeting with the P-3 office responses.

Thank you as always for your dedication to EDAC. Please "Reply to All" with any questions, comments, or votes. The P-3 office staff is copied on the email and can answer any questions you may have about the collection. It is requested that you review the attached collection and send me your response by end of day Friday November 19th.

- 1. Is the pathway required in legislation and if so which section of the law? (Need the section/statutory requirement that specifies the pathway information requirement).** EDAC committee is concerned that the collection of pathway is exceeding the mandate. They understand the need to submit the number of teachers / teachers that met the requirements, but the "how" is what is burdensome.

The pathway is required in state board rule. 13.01(C)(2).

13.01(C)(2) A teacher is deemed to have successfully completed evidenced-based training in teaching reading if the LEP submits evidence that the teacher:

13.01(C)(2)(a) successfully completed a CDE-provided reading training designed to meet this training requirement and passed the end of course assessment of learning; or

13.01(C)(2)(b) passed a CDE-approved undergraduate or graduate reading course and passed the end of course assessment of learning; or

13.01(C)(2)(c) passed a CDE-approved district or BOCES reading course or a course appropriate for license renewal and passed the end of course assessment of learning; or

13.01(C)(2)(d) holds a state of Colorado endorsement as a Reading Teacher or Reading Specialist; or

13.01(C)(2)(e) successfully completed a training program included on the department's advisory list of professional development programs created pursuant to C.R.S. § 22-7-1209(2)(c) and passed the end of course assessment of learning.

C.R.S. 22-7-1208(6)(f) states that "The state board may adopt rules as necessary **to specify the time frames and procedures for complying with the requirements specified in subsection (6)(a) of this section** and for applying for an extension pursuant to subsection (6)(d) of this section and **the form in which a local education provider must submit evidence of the completion of an end-of-course assessment of learning as required in subsection (6)(b) of this section.**" (Emphasis Added).

1. **Could districts just report whether or not a teacher has completed the training with a yes/no instead of the pathway?**
Districts are already under a significant data burden. The pathway will require teachers to voluntarily submit this information which requires a large variety of twists and turns in trying to get this data from different sources.

No because this is not in alignment with state board rule.

1. **Why can't CDE pull the pathway from the COOL system and not require districts to report it as well?**

Statute and rule require local education providers to submit evidence of completion to CDE. COOL only houses records for licensed teachers not allowing for an accurate count. Additionally, local education providers have the most information about grade level changes and those who will teach in grades K-3 for the coming year.

Thank you,

Peter

Peter Hoffman
Data Specialist
IMS - Data Services



COLORADO
Department of Education

201 E. Colfax - 507, Denver, CO 80203
Hoffman_p@cde.state.co.us | www.cde.state.co.us



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J. Patrick Mount
Executive Director of Data and Analytics
District Technology Services
St. Vrain Valley School District
mount_james@svvsd.org | 303.702.7761



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J. Patrick Mount
Executive Director of Data and Analytics
District Technology Services
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