



Education Data Advisory Committee (EDAC)
2019-20 Annual Report to the State Board of Education and the
Education Committees of the Senate and House of Representatives

July 1, 2019 - June 30, 2020

EDAC Summary

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

In 2019-20 EDAC formally met ten times, conducted six emergency reviews (via two e-mails) and in total reviewed 189 CDE data collections, a one percent increase from the 187 collections reviewed in 2018-19. Accomplishments include successfully addressing a 70% membership turnover rate, utilizing a shared re-emption process for collections of concern, limited the use of Social Security Numbers in collections and created a public monthly review document. In a special section at report end, EDAC describes our efforts to focus on creating wider awareness of EDAC's duties and accomplishments, and engaging others to streamline EDAC processes.

Accomplishments

- Reviewed 189 data collections, two more than in 2018-19. From the previous year, 31 collections were one time only or closed collections, and 29 collections were new this year. Regarding the increase, several collections are intermittent collections that are not reviewed every year.
- Employed a shared re-emption process for dealing with data collections that otherwise would not be approved. Successfully streamlined Report Card March and Teacher Student Data Link through this process, thus reducing local education agency data burden.
- Created a consolidated document for the public to easily determine what EDAC reviewed each month
- Limited use of full Social Security Numbers (SSNs) in data collections
- Granted emergency approvals to address COVID-19 flexibility utilizing existing EDAC protocols
- Transitioned well into a virtual meeting environment due to the pandemic
- Onboarded 60 percent of EDAC volunteers in September 2019 and replaced one more by year end. This 70% membership turnover in one year is unprecedented. Given EDAC's broad diversity in subject matter expertise and geographic representation, this was a challenge.
- Continued an intensive schedule to meet the April 1st advance notice requirement of 22-2-306(3)(a), C.R.S. More than a quarter (28.8%) or 55 collections were reviewed in March/April.

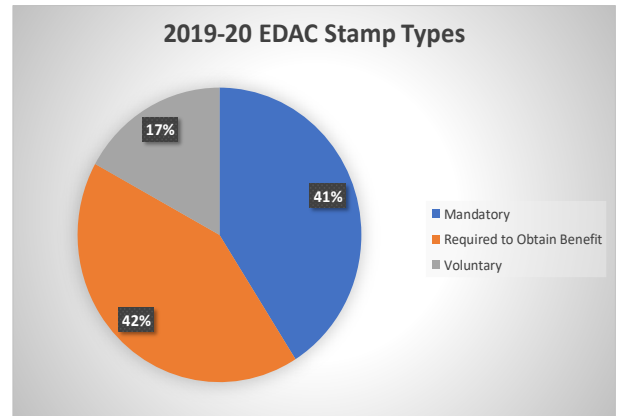
Future Focus Areas

- Remain vigilant about reducing data duplication and burden.
- Continue to advocate for the elimination of Social Security Numbers
- Eliminate the duplicative Student Information Systems (SISs) collection.
- Create monthly process to scrutinize collection authorizations and requirements.
- Collaborate with the Accountability and Continuous Improvement Unit in the shared re-emption process for Unified Improvement Plans (UIPs).
- Launch pilot of a biennial review of static collections and monitor its effectiveness.
- Engage in conversation to streamline EDAC processes.
- Provide data governance advice regarding state agency data sharing to prioritize items that could most benefit local education agencies.

Forms Review

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

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



Two-fifths (42%) of collections which EDAC reviewed in 2019-20 are labeled ‘Required to Obtain Benefit’. Two-fifths of collections (41%) are ‘Mandatory’ and almost one-fifth (17%) are ‘Voluntary’. These 2019-20 percentages are very similar to those of 2018-19. If districts or BOCES are interested in securing particular funds or services, then some amount of data collection is associated with the benefits derived. In exceedingly rare circumstances, the EDAC chairman may issue a small collections stamp to an extremely small data collection without EDAC review. For example, the confirmation of local education agency contacts for a particular program would fall in this category. Thirty-one collections were discontinued from the prior year, including one-time only surveys or items that were incorporated into related or parent collections.

Form Compliance	Mandatory	Required to Obtain Benefit	Voluntary	Total
• Full Review	50	42	15	
• Update Approvals	27	38	17	
Total Reviews	77	80	32	189
• Review Approval Withheld/Revoked	0	0	0	0
• No Approval Required				0
• Informational Briefings				2
• Small Collection				0
• Closed Collections	4	13	14	31

Review Outcomes. EDAC is tasked with making recommendations to improve the efficiency and effectiveness of data collection instruments. Very few collections move through the EDAC full review process without some suggestions for improvement. Most are approved unanimously with some minor adjustments, others with more detailed issues are invited to resubmit the collection before a stamp is issued as the one collection indicated below, and in extremely rare circumstances, a data collection is not approved. A collection may not be approved because the data burden survey confirmed a collection has been questioned by EDAC in the past, requested data is already available, the survey is poorly designed or the collection is withdrawn for later EDAC reconsideration. Report Card March and the Teacher Student Data Link were collections that EDAC targeted for the shared re-envision process in the 2019-20 school year and once re-designed and streamlined were swiftly approved. As a result of EDAC encouraging automation, three data collections were enhanced; one from paper to web-based forms, one application added auto-fill capabilities and another collection added automated data accuracy checks.

	Approved No/Few Changes	Approved With Changes	Not Approved/Resubmit	Not Approved Overruled	Not Approved (No stamp issued)	Total
Review Outcomes	129	59	1	0	0	189

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

Review Preparation. EDAC posts its meeting schedule well in advance of the upcoming school year so that CDE staff can plan an EDAC review as part of their regular routine within their data collections. EDAC must be given the review materials in a timely manner so that members have sufficient time to prepare judicious input to share with the data collector. EDAC acknowledges that in extremely rare circumstances, department data requestors may need to submit reviews during periods for which no regular meetings are scheduled. Emergency conference calls or electronic mail reviews are available if a change in state statute or some unforeseen circumstance occurs which prevents the collection from being presented at a regularly scheduled EDAC meeting. EDAC conducted six emergency reviews on two separate occasions in 2019-20, increasing from four emergency reviews on one separate occasion in 2018-19. EDAC is committed to keeping emergency reviews to a minimum.

	Meeting Materials Submitted On-Time	Meeting Materials Submitted After Deadline	Emergency Reviews	Not Reviewed	Total
Review Preparation	180	3	6	0	189

Interpretation: 2% of review materials are submitted after the required deadline which restricts EDAC's ability to provide thoughtful feedback.

Type of Collection. A large majority of EDAC reviews (85%) were existing CDE data collections. Fifteen percent of the data collections EDAC reviewed in 2019-20 were newly required through legislation or rule. The number of new collections decreased from 30 in 2018-19 to 29 new collections in 2019-20. EDAC makes every effort to identify and bring to the table those CDE data requestors not yet familiar with the EDAC review process and fortunately there were no delayed reviews this year.

	New Collections	Existing Collections On-Schedule Reviews	Delayed Reviews	Total Reviews
Type of Collection	29	160	0	189

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

2020 Legislative Follow-up

EDAC strongly encouraged action related to legislative recommendations made within its [2017-18 EDAC Data Burden Survey: An Empirical Analysis of Colorado Local Education Agencies on Data Reporting Burden, Collections and Submissions](#). Five recommendations centered around changing statute to repeal or revise low benefit collections. Engaging in EDAC's shared re-envision process, 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. The State Board of Education took action in March 2020 to make Kindergarten School Readiness reporting more relevant and meaningful to local education agencies. EDAC and CDE will continue to collaboratively work together to eliminate the Principal Preparation Program Survey duplicative reporting requirement from Colorado statute. EDAC will invite the Accountability and Continuous Improvement Unit to participate in the shared re-envision process for Unified Improvement Plans (UIPs) during the 2020-21 school year. An additional six recommendations focused on regularly reevaluating existing collections by sunseting state-required reports and submissions, evaluating low benefit collections, implementing a temporary moratorium on data collection, evaluating operational impact for new collections, and supporting data burden relief. EDAC continues to support legislation creating a voluntary statewide student information system (SIS).

2021 Legislative Recommendations

Given the focus on COVID-19 pandemic in recent months, EDAC is limiting recommendations to these three:

- **Repeal the Principal Preparation Program Survey.** Eliminate Principal Preparation Program Survey by repealing State Board of Education additional duties from 22-2-109(7) C.R.S. The collection is no longer conducted by the department due to its duplicative nature with the seven principal quality standard and one overall effectiveness ratings collected within the Human Resources collection.
- **General Assembly and CDE Collaborate to Ensure Collections are Limited to Legislative Intent.** Legislative processes should be implemented to ensure that the department doesn't overextend data collection requirements beyond legislative intent. The department should work in partnership with the General Assembly to confirm that the data collection design is limited to that required by legislation and is not expanded beyond the original objective.
- **Repeal Kindergarten School Readiness Assessments.** Eliminate Kindergarten School Readiness requirements by repealing 22-7-1004 C.R.S. Local education agencies continue to assert the huge burden imposed by the assessments required to determine school readiness. Parents and guardians have made the decision to send these young students to school and yet they are not yet of age to meet the compulsory attendance requirements. This misalignment doesn't justify the time-intensive testing and associated reporting.

Following is the special section mentioned at the beginning of this report which describes EDAC's efforts to concentrate our energies on creating wider awareness of the work the committee does and streamlining our processes as well.

EDAC Focus on Broader Awareness and Committee Improvement

The Education Data Advisory Committee spent time at our June virtual retreat in self-reflection. Two themes emerged: committee awareness and engaging others to streamline processes. Many people across Colorado, including educators, are not aware of EDAC efforts to improve data collection for local education agencies (LEAs). Also, members discussed wanting to be seen as collaborators in trying to forward the vision of the state education system, rather than a group that merely approves or opposes data collections. The more that EDAC can be cooperative and problem solving the better. EDAC is committed to having the kind of conversations that can lead to increased understanding.

EDAC was initiated in 2002-03 to address the growing quantity of local education agency data collections. Senate Bill 05-019 codified the committee's existence and was replaced by House Bill 07-1320 which stands today in 22-2-304 C.R.S. EDAC members serve four-year terms and annually spend a day each month for ten months together reviewing collections, proposed legislation and planned rules centered on data. To prepare for meetings, members communicate with individuals responsible for items up for review, both within their LEAs as well as with constituents in professional groups. Given the effort put forth for EDAC participation, members have reflected: How can EDAC recommendations be more easily implemented? Is there a more effective way to get the EDAC message across? How can EDAC best serve its stakeholders? What is EDAC's good work? How is that built upon?

Past Accomplishments of EDAC:

- *Improving collection submission forms by clarifying the process and purpose for respondents*
- *Opposed collections that were not well thought through or unnecessary*
- *Produced annual reports each year since 2006-07 and three special reports/documents (see below)*
- *Spoken with and listened to Commissioners of Education, education advocacy groups and leaders, members of the General Assembly, other CDE employees and local education agency leaders to hear concerns, improve processes and increase EDAC awareness*

Reports/Documents Produced

2007 Impact of Legislated Data Collections/Elements on CDE and Local Education Agencies. When new elements/formulas or entirely new collections are required by legislation or rule appropriate and advance notice is necessary to ensure that data will be available in the format needed. Within the department, local school districts and Boards of Cooperative Educational Services (BOCES), there is a complex series of tasks to carry the new requirements to fruition. A limited analysis of data collection requirements at the time revealed that the time span between adoption of the law/rule and the opening of the data collection with all changes intact can range from as little as eight months to as many as 35 months.

2009 EDAC Report to the General Assembly: Duplicative, Obsolete, Inefficient Reporting Requirements.

EDAC was tasked by House Bill 09-1214 to produce a report to identify unnecessary reporting requirements. Although enthusiastic to find the numerous data collections falling into the categories of duplicative, obsolete, inefficient or in which the benefits do not outweigh the costs, a limited number (only seven) were identified. Rather, EDAC found itself making eight recommendations for possible combinations or improved processes of existing collections and also focused more on the need for Colorado to put its energy and resources into designing and creating the next generation system for gathering, using and exchanging data for the benefit of its children.

2017-18 EDAC Data Burden Survey: An Empirical Analysis of Colorado Local Education Agencies on Data Reporting Burden Collections and Submissions. An ongoing, yet growing, conversation about reduction of resources directed to student instruction as well as increasing data reporting requirements prompted EDAC to

survey local education agencies (LEAs) to evaluate data burden, quantify the level of effort LEAs exert to collect and submit data, and determine how findings relate to EDAC recommendations. Survey results confirmed that data burden is real affecting LEAs of all sizes and in all regions of the state, but especially small and rural districts. Recognizing that LEAs offer one perspective on the topic, albeit one extremely important viewpoint, EDAC proposed a collaborative approach to reducing data burden that considers the input of multiple stakeholder groups. All education partners were encouraged to play their respective roles in evaluating and considering the impact of newly proposed data collections and re-evaluating existing collections.

EDAC Annual Reports to the State Board of Education and the Education Committees of the Senate and House of Representatives. Produced since 2006-07 these reports highlight the accomplishments of the committee throughout each year and contain a special section featuring a topic of interest regarding data. Special sections have covered:

- **2018-19:** Outcomes and Future Actions in Response to the 2017-18 EDAC Data Burden Survey
- **2017-18:** EDAC Data Burden Survey: An Empirical Analysis of Colorado Local Education Agencies on Data Reporting Burden, Collections and Submissions
- **2016-17:** EDAC to Address Data Burden
- **2015-16:** Ethical Education Data Practices
- **2014-15:** Strengthen Privacy Protections for Education and Related Data
- **2013-14:** Implementing Data Pipeline- Challenges and Celebrations
- **2012-13:** Severely Limit the Collection of Education Social Security Numbers (SSNs) Within CDE
- **2011-12:** EDAC Weighs Collection of Student-Level Attendance, Discipline, and Course Completion Data
- **2010-11:** EDAC Supports Legislation to Further Protect the Privacy of Educator Data Records
- **2009-10:** EDAC Legislative Review Process Recommendation
- **2008-09:** EDAC Notification and Action Process
- **2007-08:** CDE Necessity to Promptly Convert from Use of SSNs to Colorado Education ID Numbers
- **2006-07:** Impact of Legislated Data Collections/Elements on CDE and Local Education Agencies

To increase awareness of the Education Data Advisory Committee and to enhance the efforts of the committee, EDAC is proposing the following recommendations. The committee cannot increase effectiveness without taking action and working in collaboration with others.

Recommendations for EDAC:

- ✓ Create tools to assist members to share about the committee and to gather feedback
- ✓ Utilize existing communication avenues to enhance broader awareness
- ✓ Collaborate with CDE to create a biennial review process for static collections
- ✓ Involve legislators, CDE, and education advocacy groups for both focuses-streamlining processes and awareness
- ✓ Utilize discussion sessions to address varying interpretations of statute
- ✓ Look forward to how to address future data burden

Recommendations for CDE:

- ✓ Work collaboratively with EDAC to provide meaningful recommendations that the State Board of Education can act upon
- ✓ Participate with EDAC to improve processes

Recommendations for the Legislature:

- ✓ Engage with EDAC to improve processes
- ✓ Read EDAC reports and take action when applicable