COLORADO DEPARTMENT OF EDUCATION - 60 DAY COMMENTS ON OMB CLEARANCE PACKAGE, SY 2017-18 and 2018-19				Federal	
Attachments/Pages	Program	Area in Question	Questions and/or Comments:	Supporting Evidence/Impact on CO	Year
General Comments		Lack of alignment with statutory requirement	Duplicating data elements in EDFacts and the State Report Card is a tremendous burden on SEAs. The data elements prescribed in statute should be reviewed and used to eliminate duplications, and retire collections not specified under §1111(h)(5) from EDFacts.	Under §1111(h)(5) of the ESSA, Congress delineated required data elements that each State educational agency must submit to the Secretary. The proposed OMB package contains numerous data elements that are not included in this subsection of ESSA. Many seem to come from the public reporting section (§1111(h)(1)). For example, State Report Cards must disaggregate achievement for students of active duty military parents and foster children. However, the same disaggregation is not specified for Reports to the Secretary. Nonetheless, numerous data collections proposed in the OMB Package require disaggregation of assessment and accountability results for disaggregated groups beyond those required under §1111(h)(5) of the ESSA, which only requires SEAs to disaggregate data for the groups specified in Section (c)(2) of the statute (namely, ELs, students of poverty, students from major racial and ethnic groups, and students with disabilities).	2017-2018 and 2018-2019
General Comments		Timeline	The timeline proposed in the OMB Package is not reasonable and does not account for the summer months, in which many LEAs are on summer break and cannot submit data.

Furthermore, SEAs must set up new collections now in order to be meet reporting requirements within the specified timeline. We anticipate that when the specifications are released, there will be additional work required to update the systems having to be built now.

Many of the items being collected in 2016-2017 are going to be eliminated by 2017-2018 and will have little influence over programmatic decisions. Any analyses or reports generated from data collected in December 2017, will have little to no relevance or utility for work being conducted by that time.

Eliminating the 2016-2017 collection to give SEAs and LEAs time to structure and implement the 2017-2018 requirements would be extremely helpful. | Over 130 out of 180 of Colorado LEAs are small rural districts, many of which do not work over the summer. Timeline estimations should be extended to account for summer closures.

Colorado Department of Education has to update its systems now in order to meet reporting requirements, even though the OMB package will not be finalized for a few months. This timeline creates a situation which will require duplication of efforts. | All |

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General Comments		Underestimation of resources, time, and efforts required for meeting federal reporting requirements for LEAs	Colorado has over 130 rural and small districts wherein the same individual bears the responsibility for all reporting requirements, in addition to other duties. The increasing number of reporting requirements has been a tremendous burden on our smaller districts, placing extra burden and responsibility on the shoulders of individuals serving numerous roles within the same district. These districts do not receive sufficient level of funding to hire others for support. Conversely, our larger districts also have capacity issues, in that the volume of reporting requirements for larger districts forced many of them to utilize increasing portions of their federal funds to support data reporting positions. By virtue of having to increase the funding used to support data reporting, they have seen a decrease in funds available for serving students. At a time when many districts are likely to see a decrease in funding, it would be extremely helpful for USDE to review all reporting requirements to minimize any duplication and reduce burden as much as possible.		All
General Comments		Underestimation of resources, time, and efforts required for meeting federal reporting requirements	The OMB package significantly underestimates the resources, costs, and efforts incurred by States in order to meet the proposed reporting requirements. It is requested that the Secretary provide resource and cost estimates that more accurately reflect the impact on States.	Colorado does have only 1 FT EDFacts Coordinator; however, the estimate in the OMB package does not account for the work of others in the Department required to support the federal reporting work. In order for the EDFacts Coordinator to submit all EDFacts files, support from our IT and IMS departments are necessary (conservatively estimated at an additional 2.0 FTE) to maintain software and data warehouse files used for reporting. Furthermore, program coordinators and data analysts prepare and validate each of the data files submitted (conservatively estimated at an additional 4.0 FTE across the Department). Therefore, a more reasonable estimate for the impact on the SEA would be 7.0 FTE. These estimates do not account for the FTE at the LEA level who coordinate and submit data to the SEA in order to meet reporting requirements.	
B3-55	Department Priorities	Chronic Absenteeism Table	Does the OCRD Collection already include Chronic Absenteeism? If so, can the Secretary get the data from that data source and not require a separate report under EDFacts?		2017-2018 and 2018-2019

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B3-56	Department Priorities	Baseline Indicator Status	SIG will not exist under ESSA. Collecting "the classification of school implementation status for SIG" will be unnecessary in the 2017-2018 school year when we have begun ESSA Implementation. Furthermore, the same elements are required for the 2016-2017 school year. By the time this data is collected and used for analyses, the SIG program will no longer exist. Eliminating all collections pertaining to SIG, priority and focus schools beginning with the 2016-2017 collection would be very helpful.	Collecting and analyzing data after school designation has been eliminated will have limited relevance for the work being conducted in SEAs after implementation of ESSA has begun. The cost of continuing this collection far outweighs any benefit from any analysis results, which will be produced after the end of the program.	2017-2018 and 2018-2019
B3-58 through 62	Department Priorities	SIG, priority and focus school implementation (DGs 732, 734, 733, 745, 729, 731, and 735)	SIG, priority and focus schools will not exist under ESSA. Remove all collections having to do with these school designations. Eliminating all collections pertaining to SIG, priority and focus schools beginning with the 2016-2017 collection would be very helpful.	Collecting and analyzing data after school designation has been eliminated will have limited relevance for the work being conducted in SEAs after implementation of ESSA has begun. The cost of continuing this collection far outweighs any benefit from any analysis results, which will be produced after the end of the program.	2017-2018 and 2018-2019
B3-87	English Learners and Title III	Ells not Proficient Table	Are we counting the number of Els not proficient by their 5th year in program, or by their 6th year, so that they have had a full 5 years in program?		
B3-105	Non-Fiscal Common Core	Direct Certification	How will reporting direct certification at the school level impact the requirement to serve Title I schools in rank order of poverty determination assigned to grade spans?	These requirements may have unintended consequences for ranking of schools.	
B4-47	LEP Students and Title III	Language Instruction Educational Program	It appears that LIEP will now be reported through EDFacts at the student level. Colorado currently only collects data on student enrollment in bilingual versus English as a Second Language programs. The additional LIEP will need to be added to the collection in order for Colorado to move to reporting this at the individual student level.	The burden of new reporting at student level entails adding new fields to existing collections. New trainings will be required for LEAs to report all LIEP at the student level to Colorado	2017-2018 and 2018-2019
C-16	English Learners and Title III	ELs who have not attained proficiency within 5 years of identification as an EL	Are we counting the number of ELs not proficient by the beginning of the 5th year or by the end of the 5th year, so that they have had a full 5 years in program?		2017-2018 and 2018-2019
C-16	English Learners and Title III	Title III English learners exited	Exited during the reporting year, or exited at any time? Please specify by the end of which program year.		2017-2018 and 2018-2019
C-17	New Data Categories	Foster Care Status	It appears that students in foster care are to be reported in the list of Data Groups, which have to do with assessment and accountability results. This is in conflict with statutory requirements (see first general comment).		2017-2018 and 2018-2019
C-18	New Data Categories	Military Connected Students	It appears that students of parents in active military duty are to be reported in the list of Data Groups, which have to do with assessment and accountability results. This is in conflict with statutory requirements (see first general comment).		2017-2018 and 2018-2019

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D	Directed Questions	Teacher effectiveness level	What about new teachers or those new to state who don't have an effectiveness rating? Will the system allow for teachers that may be effective in one content area and not in another?		
D	Directed Questions	Teacher Count	Recommend using FTE rather than headcount. It more accurately reflects teacher resources and allows schools to get credit when teachers are teaching in-field for part of their FTE.		
B3-25 and 26	Accountability and Reporting	Math and RLA participation AMOs	Why do we need to report these participation AMOs, which are going away beginning in 17-18, when participation rates already are collected through C185 and 188?		2016-2017