



**Education Data Advisory Committee (EDAC)  
2018-19 Annual Report to the State Board of Education and the  
Education Committees of the Senate and House of Representatives**

*July 1, 2018 - June 30, 2019*

**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 2018-19 EDAC formally met ten times, conducted four emergency reviews (via one e-mail) and in total reviewed 187 CDE data collections, a seven percent increase from the 174 collections reviewed in 2017-18. Accomplishments include releasing data burden survey results, creating a shared re-envision process for collections of concern, and encouraging partnerships regarding industry-recognized credentials and nonpublic school data. In a special section at the end of this report, EDAC presents outcomes and future actions of their data burden report in an effort to ultimately reduce local education agency data burden.

**Accomplishments**

- Reviewed 187 data collections, 13 more than in 2017-18. From the previous year, 18 collections were one time only or closed collections, and 30 collections were new this year. Regarding the increase, several collections are intermittent collections that are not reviewed every year.
- Released the *2017-18 EDAC Data Burden Survey: An Empirical Analysis of Colorado Local Education Agencies on Data Reporting Burden, Collections and Submissions* to quantify data collection time and effort in conjunction with the value to local education agencies (LEAs). EDAC members have presented survey results 13 times to over 500 individuals and will continue to present as requested. Follow-up and reaction are found within the special section on page 5.
- Initiated a shared re-envision process to provide detailed recommendations to CDE decision makers when a data collection is not approved as result of the data burden survey recommendations.
- Simplified EDAC's update approval process.
- Encouraged CDE partnerships between Accountability and Data Analysis and Postsecondary and Workforce Readiness to collect industry-recognized credentials and between Special Education and Federal Programs to collect nonpublic school data.
- Supported exploration around the statewide Student Information System.
- Continued an intensive schedule to meet the April 1<sup>st</sup> advance notice requirement of 22-2-306(3)(a), C.R.S. More than a quarter (27.2%) or 51 collections were reviewed in March.

**Future Focus Areas**

- Remain vigilant about reducing data duplication and burden.
- Further communication of data burden survey results, encourage action and monitor progress.
- Enhance understanding of data value beyond local education agencies.
- Collaborate with CDE collection leads to scrutinize collection authorizations and requirements as EDAC refines the newly created data collection re-envision process.
- Continue to inquire about prior program outcomes accompanied by resulting changes.

## 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 (41%) of collections which EDAC reviewed in 2018-19 are labeled ‘Required to Obtain Benefit’. More than one-third of collections (36%) are ‘Mandatory’ and one-quarter (23%) are ‘Voluntary’. These 2018-19 percentages are very similar to those of 2017-18. 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. Ten collections were discontinued from the prior year, including one-time only surveys or items that were incorporated into related or parent collections.

<b>Form Compliance</b>	<b>Mandatory</b>	<b>Required to Obtain Benefit</b>	<b>Voluntary</b>	<b>Total</b>
• <b>Full Review</b>	19	41	29	89
• <b>Update Approvals</b>	49	36	13	98
<b>Total Reviews</b>	68	77	42	187
• <b>Review Approval Withheld/Revoked</b>	2	0	1	3
• <b>No Approval Required</b>				0
• <b>Informational Briefings</b>				10
• <b>Small Collection</b>				0
• <b>Closed Collections</b>	2	5	3	10

**Review Outcomes.** EDAC is tasked with making recommendations to improve the efficiency and effectiveness of data collection instruments. Very few collections move through the EDAC full review process without some suggestions for improvement. Most are approved unanimously with some minor

adjustments, others with more detailed issues are invited to resubmit the collection before a stamp is issued, and in extremely rare circumstances, a data collection is not approved. A collection may not be approved because the 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. Kindergarten School Readiness, the Principal Preparation Program Survey, Report Card March and the Teacher Student Data Link are collections that EDAC did not approve or have targeted for the shared re-envision process in the 2019-20 school year. EDAC also encourages the automation of data collections and two were. One collection progressed from paper to online and the other was converted from an Excel file to Data Pipeline.

	Approved No/Few Changes	Approved With Changes	Not Approved/Resubmit	Not Approved Overruled	Not Approved (No stamp issued)	Total
<b>Review Outcomes</b>	162	20	2	2	1	187

**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 four emergency reviews on one separate occasion in 2018-19, decreasing from seven emergency reviews on five separate occasions in 2017-18. 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
<b>Review Preparation</b>	162	21	4	0	187

**Interpretation:** 11% 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 (81%) centered on existing CDE data collections. Sixteen percent of the data collections EDAC reviewed in 2018-19 were newly required through legislation or rule. The number of new collections decreased from 42 in 2017-18 to 30 new collections in 2018-19. EDAC is continuing to make every effort to identify and bring to the table those CDE data requestors who are not yet familiar with the EDAC review process. There were six delayed reviews in 2018-19.

	New Collections	Existing Collections On-Schedule Reviews	Delayed Reviews	Total Reviews
<b>Type of Collection</b>	30	151	6	187

**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.

## **2019 Legislative Follow-up**

There were five legislative recommendations highlighted in the *Education Data Advisory Committee 2017-18 Annual Report*. EDAC recommendations and resulting actions were:

- 1) *Eliminate Teacher Student Data Link (TSDL)*. A pause in TSDL for the 2018-19 school year allowed time for a stakeholder group to consider various options. The collection was reinstated for 2019-20, but districts are no longer required to report data for elementary students and teachers.
- 2) *Eliminate Kindergarten School Readiness (KSR) Reporting*. Legislation gives authority for KSR reporting to the State Board of Education. No legislative or Board action was taken to eliminate or alter this burdensome and non-beneficial report. However EDAC recorded its reporting preferences to prepare for a time when KSR is revisited.
- 3) *Abolish Report Card March (RCM)*. Over the years EDAC has recommended both collection abolishment and streamlining RCM within the Directory. CDE and EDAC have agreed to collaborate on improving RCM for the future.
- 4) *Eliminate the Principal Preparation Program*. This requirement was not stricken from legislation, but CDE determined not to proceed with the collection due to its duplicative nature.
- 5) *Limit Unified Improvement Plan Participation*. EDAC provided suggestions to CDE improvement planning staff. Collaboration between these two entities will continue to enhance the reporting experience for local education agencies.

## **2020 Legislative Recommendations**

EDAC strongly encourages action related to legislative recommendations made within its data burden survey (repeated below). Details can be found within the [2017-18 EDAC Data Burden Survey: An Empirical Analysis of Colorado Local Education Agencies on Data Reporting Burden, Collections and Submissions](#) on pages 8-15. Additionally, EDAC's newly created shared re-envision process to provide detailed recommendations to CDE decision makers when a data collection is not approved will assist in the streamlining of low benefit collections.

### **Change Statute to Repeal or Revise Low Benefit Collections**

- Eliminate Report Card March by repealing performance reports {22-11-503(3)(f-g) C.R.S.}
- Eliminate Teacher Student Data Link (TSDL) by repealing Commissioner duties {22-2-112(p-q) C.R.S.; 22-9-106(1.5)(a-b) C.R.S.; 22-11-503.5(I-II) C.R.S.}
- Revise Kindergarten School Readiness reporting requirements by repealing school readiness assessment {22-7-1004(2)(b) C.R.S.}
- Eliminate Principal Preparation Program Survey by repealing State Board of Education additional duties {22-2-109(7) C.R.S.}
- Limit UIP process to accredited with priority improvement or turnaround {22-11-303(1)(c) C.R.S.; 22-11-304(1)(c) C.R.S.}

### **Reevaluate Existing Collections Regularly**

- Sunset state-required reports and submissions
- Evaluate low benefit collections
- Implement a temporary moratorium on data collection
- Evaluate operational impact for new collections
- Support data burden relief
- Consider legislation creating a voluntary statewide student information system (SIS)

*Following is the special section mentioned at the beginning of this report which is a summary of the resulting outcomes and actions to the 2017-18 EDAC Data Burden Survey.*

## Outcomes and Future Actions in Response to the 2017-18 EDAC Data Burden Survey

Educational data is imperative to support student learning and success. Data is a valuable asset to the mission of education. However, increasing data demands inspired the Education Data Advisory Committee (EDAC) to conduct the survey and release results within its *2017-18 EDAC Data Burden Survey: An Empirical Analysis of Colorado Local Education Agencies on Data Reporting Burden Collections and Submissions*. Results from EDAC's survey confirm that data burden is real. This burden is felt across LEAs of all sizes, in all regions of the state, and is pushing limits of the available resources in small and rural districts. In response to the findings and in line with its statutory role, EDAC offered recommendations and considerations to strategically address data burden. 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.

### What's Happened?

Since the data burden survey results were disseminated, there have been three items that have been addressed, but not necessarily as a direct result of the survey.

- **Eliminate the Teacher Student Data Link (TSDL) Collection.** A stakeholder workgroup was convened and released *Teacher-Student Data Link Stakeholder Workgroup Summary of Findings*. The group recommended that CDE take steps to improve and streamline the TSDL collection and make the data collected in TSDL more useful to districts. The collection was on pause for the 2018-19 school year, but was reinstated for 2019-20. However, districts are no longer required to report elementary level data.
- **Pursue the Use of a Statewide Student Information System (SIS).** CDE engaged a vendor to conduct a study regarding a possible Colorado SIS. The *Value Assessment of a Statewide Student Information System - Results and Recommendations* report provides national observations and insights, addresses district technical, operational and financial concerns, and highlights opportunities and challenges. The report notes that a statewide SIS could possibly save Colorado more than \$4 million, but no firm recommendation one way or the other is given. Five steps are outlined to continue addressing SIS feasibility that will position Colorado to make a "go/no-go" decision.
- **EDAC's Shared Re-envision Process** was created at the June 2019 EDAC retreat. For collections that EDAC members have questioned within data burden survey results, this process involves a collaborative effort between EDAC members and the affected CDE program unit to work together throughout the school year to make collection recommendations that CDE's executive team can support for future years.

### What's Next?

Although there are numerous data burden suggestions, EDAC recognizes that these cannot all be addressed at once. A coordinated and phased in approach may make addressing the recommendations less overwhelming than tackling them all immediately. Below are EDAC proposals for items to be undertaken within the coming year.

- **Colorado General Assembly.** Since CDE no longer requests that the Principal Preparation Program survey be completed since the data is collected elsewhere, School readiness assessment C.R.S. 22-2-109(7) should be repealed as soon as possible.
- **State Board of Education and Colorado Department of Education.** An ongoing process should be developed in which CDE and EDAC define and present annual data recommendations and the State Board prudently considers and acts on them.
- **Colorado Department of Education.** Any data collection lead should review reporting obligations on an annual basis to ensure alignment with legislative data reporting requirements and carefully evaluate each low benefit collection, both high and low effort. This goes hand in hand with the process described above.
- **Local Education Agencies (LEAs) and Other Stakeholders.** Districts should speak with legislators and State Board members about data burden recommendations and provide feedback and suggestions to EDAC members and CDE staff.

A collaborative approach compels all education data partners in coming years to:

- **Consider operational impact** of each new collection. Please note that rural districts spend twice as much of their district overall budget on data reporting as larger districts (\$5.67 vs. \$2.85 respectively).
- **Support data burden relief** whenever possible for all districts, especially those in rural areas. Since 1998 the cost to submit only the major collections has steadily increased, and has grown by 53% over that 20-year period.

Key stakeholders, specifically the Colorado Legislature, State Board and CDE need to work together to address data burden by removing legal or regulatory requirements for duplicative and low benefit data collections, regularly reevaluating existing collections, and considering the impact of any new requirement, especially on rural districts. Together we can strategically address data burden across Colorado.