Education Data Advisory Committee (EDAC)
2012-13 Annual Report to the State Board of Education and the
Education Committees of the Senate and House of Representatives

July 1, 2012 - June 30, 2013

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 exchange systems. 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 data collections are redundant and proposes alternatives, and reviews data collection procedures and recommends improvements. 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 2012-13, EDAC formally met ten times, conducted five emergency reviews (e-mail and phone conferences) and in total reviewed 141 CDE data collections, a 1.4 percent decrease from the 143 collections reviewed in 2011-12. Accomplishments include advising Data Pipeline progress and giving input to other key CDE initiatives such as Data Pipeline. In a special section at the end of this report, EDAC recommends severely restricting the collection of social security numbers within the Department.

Accomplishments

- Reviewed 141 CDE data collections, two fewer than in 2011-12. Of these, 52 collections were closed or one time only collections from the previous year and 50 collections were new.

- Reviewed and provided consultation to Data Pipeline implementation.

- Provided collaborative feedback to enhance departmental efforts such as Educator Effectiveness and Statewide Standard Course Codes.

- Implemented new legislative review process with the Office of Legislative Legal Services. EDAC was notified of just one proposed bill with data reporting impact to local education agencies- HB 13-1211 concerning English language proficiency programs in public schools.

- Continued an intensive schedule to meet the April 1st advance notice requirement of 22-2-306(3)(a), C.R.S. Two-fifths (40%) or 57 collections were reviewed in March.

Future Focuses

- Continue Data Pipeline advisory responsibilities. Guide CDE on methods to share local education agency best process practices. Quantify cost and burden of implementation. Encourage provision of detailed coding scenarios. Promote statewide data sharing to support meeting instructional needs of students.

- Increase interaction with Student Assessment as new state assessments are implemented.

- Monitor the impact of Reading to Ensure Academic Development (READ) Act.

- Promote the combination of Directory and Report Card March submissions.

- Require adherence to EDAC submission deadlines.

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 not be attached to this collection but it is statutorily required. However, 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 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.

Less than half (45 percent) of collections which EDAC reviewed in 2012-13 are labeled 'Required to Obtain Benefit'. One-third (34 percent) are 'Mandatory' and one-fifth (21 percent) are 'Voluntary'. 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. Fifty-two collections were discontinued from the prior year.

Form Compliance	Mandatory	Required to Obtain Benefit	Voluntary	Total
• Full Review	35	25	12	72
• Update Approvals	13	38	18	69
Total Reviews	48	63	30	141
• Review Approval Withheld/Revoked	0	0	0	0
• No Approval Required				4
• Informational Briefings				19
• Small Collection				4
• Closed Collections	6	29	17	52

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 collection was distributed prior to EDAC review, the requested data is already available, the survey is poorly designed or the collection is withdrawn for later EDAC reconsideration. EDAC also encourages the automation of data collection.

	Approved No Changes	Approved With Changes	Not Approved Resubmit	Not Approved (No stamp issued)	Total
Review Outcomes	93	42	6	0	141

Review Preparation. EDAC posts its meeting schedule well in advance of the upcoming school year so that CDE staff can schedule 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 seven emergency reviews on five separate occasions in 2012-13, decreasing from 23 emergency reviews on nine separate occasions in 2011-12. 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	128	6	7	0	141

Type of Collection. The majority of EDAC reviews centered on existing CDE data collections. Over one-third (35 percent) of the data collections EDAC reviewed in 2012-13 were newly required through legislation or rule. The number of new collections increased to 50 in comparison to 39 new collections in 2011-12. 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 no delayed reviews in 2012-13.

	New Collections	Existing Collections On-Schedule Reviews	Existing Collections First Time or Delayed Reviews	Total Reviews
Type of Collection	50	91	0	141

2013 Legislative Follow-up

There were five legislative recommendations highlighted in the *Education Data Advisory Committee 2011-12 Annual Report*. First, the recommendations regarding a feasible timeline for Colorado's Great Teachers and Leaders Bill have been addressed by CDE. Teacher and principal evaluations have been piloted and will be collected in 2013-14 at the same time evaluation pilots for special service providers are conducted. Additional funding has been added for capacity and training, assessment literacy, a resource bank, state model refinement, and data systems. The 2013-14 school year is a hold-harmless year for educators as they transition to new evaluation systems, meaning that a final rating of partially effective or ineffective will not count towards the loss of non-probationary status. CDE will continuously gather feedback and use it to improve the evaluation system. CDE has worked with Colorado educators to identify content specific assessments and made them broadly available in the CDE Resource Bank.

The results of the remaining four EDAC recommendations are subsequently summarized. House Bill 13-1220, primarily sponsored by Representative Joseph Salazar and Senator Rollie Heath, strengthens privacy protections for educator evaluation data. CDE's Executive Team authorized the 2014-15 delayed collection of student level attendance and discipline data as part of the Data Pipeline rollout after carefully weighing the salient points of EDAC's special section. House Bill 13-1219, primarily sponsored by Representative Millie Hamner and Senator Nancy Todd, authorizes the collection of student level course completion data. The unaddressed recommendation regarding College in Colorado has been withdrawn. While CDE suggested a student interchange field to collect the prevalence of blended learning, EDAC members voiced concern that the data may result in reduced district funding as an unintended consequence, and also suggested the information might be better collected as an attribute within the Statewide Standard Course Codes collection or the Teacher Student Data Link interchange.

2014 Legislative Recommendations

- **Severely limit the collection of educator Social Security Numbers (SSNs).** EDAC recommends that CDE discontinue the repetitive acquisition of this sensitive data field across departmental collections. EDAC made the case in its' 2007-08 annual report that CDE needed to promptly convert from the use of SSNs to Colorado educator identifiers (EDIDs). While these identifiers have been created and are broadly used, CDE continues to collect SSNs within various educator collections. The special section on page six highlights this continuing concern. *(Note: CDE hasn't ever collected SSNs for students.)*

- **Implement a moratorium on major education legislation.** Colorado educators, data providers and beyond, are feeling overwhelmed by the broad range of education initiatives being put into effect at this time. As these laws are coming together across Colorado, give local education agencies (LEAs) the opportunity to implement these initiatives with fidelity before burdening them with additional requirements. Examples of recent legislation/initiatives and their respective burdens are as follows.

  - **Data Pipeline.** This new system, initially implemented July 1st 2013 with a final rollout of September 1st 2013, is a streamlined approach to efficiently move required education information from local education agencies to CDE. Data Pipeline reduces data redundancy, captures closer to real-time data, streamlines the data collection process and allows districts to exchange information on transferred students. Data Pipeline replaces the Automated Data Exchange (ADE) system used

for state reporting, and takes CDE from 19 point-in-time collections to six transactional interchanges, allowing local education agencies to submit data regularly to CDE and fix data errors as they go. The launch of the system brings the challenges of new requirements and process change to each LEA. This system includes the provision of detailed educator and student course information within the Teacher Student Data Link for the 2013-14 school year. Additionally, data liaisons are preparing to provide attendance and discipline data at the student level beginning in 2014-15. *Burden. This new collection system is creating the need for organizational change management, employee training and the increased frequency of file submissions at the local level. In the near future, more detailed individual data is being requested through the Teacher Student Data Link and for student discipline and attendance.*

o **Educator Effectiveness.** Senate Bill 10-191 established new requirements for evaluating teachers and principals. The new system was piloted in 2012-2013, and will be implemented statewide in 2013-2014 and finalized in 2014-2015. Educator effectiveness as laid out in Senate Bill 10-191 is phased in across the state with personnel evaluation systems first concentrating on teachers and principals, followed by other licensed personnel. *Burden. The implementation of a new standardized educator rating system is proving to be extremely time intensive for district and school administrators. Local education agencies must also collect and report additional detail on educator effectiveness. Additional assessments must be administered to meet the 50 percent growth requirement as well.*

o **Accountability Alignment.** The purposes of Senate Bill 09-163 included 1) aligning conflicting accountability systems into a single system that passes federal muster 2) modernizing and aligning reporting of state, district and school performance information 3) creating a fairer, clearer and more effective cycle of support and intervention and 4) enhancing state, district and school oversight of improvement efforts. *Burden. While putting into practice Unified Improvement Plans (UIPs) is seen as a greatly beneficial process, an extraordinary amount of staff time is dedicated to the production of these educational improvement outlines for both schools and districts.*

o **CAP4K.** Senate Bill 08-212, also known as "Colorado's Achievement Plan for Kids" was a landmark education reform initiative that serves to improve Colorado's public education through alignment of preschool through postsecondary expectations. It establishes new standards and new assessments that enable all students to graduate high school with the skills and the knowledge to succeed in today's 21st century, ultra-competitive global economy. *Burden. This all-encompassing legislation creates many new requirements for local education agencies. School staff must create Individual Career and Academic Plans (ICAPs), make sure students meet new graduation guidelines, administer time-consuming school readiness assessments and adhere to new Reading to Ensure Academic Development (READ) rules.*

Severely Limit the Collection of Educator Social Security Numbers (SSNs) Within CDE

Since the 2006-07 EDAC report, the recommendation focusing on the implementation of a Colorado education identifier has been fulfilled. HB-09-1065 directed the Colorado Department of Education to develop a system that will assign unique identifiers to teachers and principals employed by a local education agency. Development of the system began in September of 2009 and ten months later went live on July 1, 2010. Close to 140,000 EDIDs were generated using the 2009 Human Resources educator data.

Despite the use of EDIDs, the opportunity for a major Colorado Department of Education (CDE) breach continues to exist as Social Security Numbers (SSNs) are collected and used across various educator data collections. This identifying number is critical in generating and maintaining accurate educator identifiers (EDIDs) within the Educator Identification System (EDIS). The Human Resources and the Math Science Partnership collections continue to obtain SSNs for the purposes of alignment to the Educator Licensing (e-licensing) system. This alignment is not possible until EDIDs are fully integrated into the e-licensing system.

The across state and local agency Relevant Information to Strengthen Education (RISE) efforts have shown that SSN is the key to linking CDE data to other state agencies. Regardless of this need, the utmost security measures should be implemented to severely limit access to this highly sensitive field. Currently, background checks are an important part of the educator licensing process in which the Colorado Bureau of Investigation and the Federal Bureau of Investigation both use this data point. The criminal justice system uses SSN to track accused educators, in the rare event that they are involved in an illegal activity. Therefore total elimination from CDE systems is not possible. Efforts should be made to collect SSN once, securely store, and use only when absolutely necessary to address linkage needs.

In addition, CDE should establish processes through which educators across all facets of the education spectrum can be related. The P-20 (preschool to workforce) Data Link project of CDE's Relevant Information to Strengthen Education (RISE) initiative will link information from CDE to information from other state agencies. Such a connection, based on EDIDs whenever possible, would allow a rich basis for analysis as educators move across education levels.

CDE should be proactive in eliminating this security risk. There have been no security violations within public K-12 education, but there are known cases within other Colorado state agencies and within school districts. The potential for a breach is ever present, therefore the Department should do all in its power to promptly cease using SSN as a primary reporting field. System conversion would allow a more secure method for dealing with state and federal reporting mandates. Although CDE uses secure systems through which licensing and human resources data are collected, the current use of SSN as an identifier is a practice that should be discontinued as soon as possible. To reiterate, CDE's ultimate goal is to singly collect, securely store, significantly limit the use of and aggressively protect Social Security Numbers as linkage demands are met.

EDAC Recommendations:

- *Legislature should provide necessary resources to allow Educator Licensing to populate educator identifiers within the existing e-licensing system.*

- *Ensure a method to connect educators across pre-kindergarten, K-12 and postsecondary (P-20).*

- *CDE must design a secure protocol for collecting SSN once and storing it for purposes of linking to other state agencies.*