Education Data Advisory Committee (EDAC)
2013-14 Annual Report to the State Board of Education and the
Education Committees of the Senate and House of Representatives

July 1, 2013 - June 30, 2014

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 2013-14, EDAC formally met ten times, conducted six emergency reviews (via e-mail or phone conferences) and in total reviewed 139 CDE data collections, a 1.0 percent decrease from the 141 collections reviewed in 2012-13. Accomplishments include undertaking an ongoing Data Pipeline advisory role and proactively discussing proposed legislation and rules. In a special section at the end of this report, EDAC highlights Data Pipeline challenges and celebrations, and recommends support for meeting related goals for the system.

Accomplishments

- Reviewed 139 data collections, two fewer than in 2013-14. Of these, 48 collections were closed or one time only collections from the previous year and 46 collections were new.

- Provided consultation to Data Pipeline in an advisory capacity.

- Proactively reviewed 2014 proposed legislation and rules.

- Modified bylaws to remove CDE member voting privileges and strengthened the process to move a collection to a higher level in CDE should a contentious collection arise.

- Continued an intensive schedule to meet the April 1st advance notice requirement of 22-2-306(3)(a), C.R.S. Over one-third (37%) or 52 collections were reviewed in March.

Future Focuses

- Lessen periods of intense data burden by suggesting modifications to Data Pipeline collection calendar.

- Weigh methods for balancing parent/public data demands with remaining compliant with federal and state reporting requirements.

- Maintain focus on implementation of new state assessments.

- Monitor the impact of Special Education results driven accountability through the Colorado Continuous Improvement Process.

- Strengthen legislative review process with the Office of Legislative Legal Services.

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.

Less than half (49 percent) of collections which EDAC reviewed in 2013-14 are labeled 'Required to Obtain Benefit'. One-third (32 percent) are 'Mandatory' and one-fifth (19 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. Forty-eight collections were discontinued from the prior year.

Form Compliance	Mandatory	Required to Obtain Benefit	Voluntary	Total
• **Full Review**	22	38	20	80
• **Update Approvals**	23	30	6	59
Total Reviews	45	68	26	139
• **Review Approval Withheld/Revoked**	0	0	0	0
• **No Approval Required**				2
• **Informational Briefings**				13
• **Small Collection**				5
• **Closed Collections**	8	30	10	48

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	97	38	4	0	139

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 nineteen emergency reviews on six separate occasions in 2013-14, increasing from seven emergency reviews on five separate occasions in 2012-13. 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	114	6	19	0	139

Type of Collection. The majority of EDAC reviews centered on existing CDE data collections. One-third (33 percent) of the data collections EDAC reviewed in 2013-14 were newly required through legislation or rule. The number of new collections decreased to 46 in comparison to 50 new collections in 2012-13. 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 2013-14.

	New Collections	Existing Collections On-Schedule Reviews	Existing Collections First Time or Delayed Reviews	Total Reviews
Type of Collection	46	93	0	139

2014 Legislative Follow-up

There were two major legislative recommendations highlighted in the *Education Data Advisory Committee 2012-13 Annual Report*. First, EDAC advocated for severely limiting the collection of educator Social Security Numbers (SSNs). Specific proposals included adequate resources to allow Educator Licensing to populate educator identifiers (EDIDs) within the existing e-licensing system; considering the progression of data surrounding educators from pre-kindergarten through postsecondary education; and CDE designing a secure protocol for collecting SSNs of district employees once and storing them for necessary purposes. While SSNs are required for educator licensing background checks, steps have been taken to populate the e-licensing system with educator identifiers rather than SSNs. Also, discussions persist regarding the educator data continuum from early childhood to postsecondary. The secure protocol will be designed utilizing EDIDs from within the e-licensing system.

Second, EDAC recommended a moratorium on major education legislation. While several education-related bills were passed, none create the amount of data burden associated with previous Data Pipeline, educator effectiveness, accountability alignment, and Colorado's Achievement Plan for Kids (CAP4K) legislation. The 2014 legislation causing the most concern related to data burden on local education agencies was the financial transparency requirements of the Student Success Act (HB14-1292). Common themes that surfaced through the 2014 legislative session were finance, data privacy and transparency.

2015 Legislative Recommendations

- **Protect local education agencies.** Colorado educators and data providers are feeling inundated by the multitude of education initiatives currently being put into effect. As implementation of these efforts continues, the legislature must consider a moratorium on major education legislation and give local education agencies (LEAs) the opportunity to implement these initiatives with fidelity before burdening them with additional requirements. As the common themes of finance, data privacy and transparency are likely to continue in the 2015 legislative session, guard against creating additional data burden to districts which create road blocks to attaining their mission of educating students.
- **Make financial resources available to fund data collection and reporting.** With the combination of 2013-14 Data Pipeline implementation and recent legislative data demands, local education agencies feel overwhelmed by new submission processes and increased requirements. Districts and BOCES need additional financial resources to stay on top of new reporting requirements such as the data provision burden created by teacher-student data link (TSDL) as required as part of Senate Bill 10-191. See page 5 for information about the successes, shortcomings and suggestions following the first year implementation of the Data Pipeline system.
- **Limit stipulations to obtain financial benefits.** Local education agencies perceive that the legislature is increasingly attaching undue restrictions to legislation that impedes the districts from reaping financial benefit. Such stipulations add to the already heavy data burden imposed by current education initiatives.
- **Eliminate first come, first serve grant stipulations.** The inclusion of a 'first come, first serve' clause in regard to making competitive grant awards was added to two new legislated state grant programs last year. This effectively negates the competitive grants process because grants are awarded solely based on the time an application was received by CDE rather than on the quality of a proposal. In addition, smaller, rural districts which do not have the capacity or personnel to put together applications as quickly as larger districts may be harmed.

Implementing the Data Pipeline- Challenges and Celebrations

The 2013-14 implementation of Data Pipeline attempted to create a streamlined approach to move required data from school districts to the Colorado Department of Education (CDE). Data Pipeline reduces data redundancy, captures closer to real-time data, and streamlines data collection processes. Data Pipeline 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 occur. The interchanges are focused on student, staff, special education, discipline, Title I and teacher-student data link data. These interchanges are intended to be transactional in nature, allowing local education agencies (LEAs) to submit data to CDE throughout the year and get feedback on potential errors. There are also a limited number of year-round and periodic collections as part of the new system.

Challenges. The COGNOS reporting tool within Data Pipeline created frustration, performance issues plagued early months of the project, moving closer to 'real time' data created multiple complications, and understanding identity management (IDM) roles was a new concept to many were some of the unforeseen obstacles to Data Pipeline. Many lessons were learned, including that the system was built at the same time as roll-out, the system was not stress-tested, pilots were conducted independently while interdependence requires cross-piloting, and an aggressive timeline added pressure to both local education agencies and the department. Now that grant funds have been expended, additional resources are needed. The emergence of a separate special education system created a lag in processing times as data moved from the special education system into Pipeline, introduced integration issues, required duplicative interchange data reporting, and caused local education agency confusion as to when to proceed to next submission process. Other notable shortcomings were that the system did not fulfill the promise of removing redundancy. There was a lack of understanding regarding system dependencies, data cleaning processes which are constant rather than point in time, necessary internal departmental communication, and of the patience needed with a new system.

Celebrations. There were many system benefits to the Pipeline which included IDM maintaining privacy, the system being able to accept multiple file types, the online system working from anywhere, and cleaner source data. Communication efforts were strong as both inter- and intra-LEA communications improved. Collaboration between CDE and LEAs was strengthened as the department served as the ultimate help desk, and Town Halls and Huddles served as excellent communication channels. Other notable successes were that LEAs served as testers and assisted in finding issues, districts adopted new processes and found higher levels of accomplishment within the new system, and since LEAs have one cycle under their belts, Data Pipeline will be easier in future years.

Recommendations for CDE. The State Board of Education and Education Committees of the Colorado House of Representatives and the Senate should support CDE in carrying out the following goals.
- Short-term (Immediate)
    - Continue communication channels through Town Halls and Huddles
    - Give special education submitters direct access to Pipeline
    - Revisit special education discipline reporting responsibilities and file layouts
    - Ensure that the 2014-15 calendar reflects no periods of overload
    - Map dependencies of submissions contingent on other data

- Mid-term (by the 2015-16 school year)
    - Stabilize Pipeline before adding more collections
    - Train LEAs on COGNOS (reports that are available for collections)
    - Possibly change legislative deadlines for collections, including general and special education human resources, based on calendar and dependencies

- Long-term (by the 2016-17 school year)
    - Increase financial resources to allow LEAs to collect and report data for the Pipeline without taking money/resources away from classrooms
    - Develop improved processes for CDE/vendor communication