



**Education Data Advisory Committee (EDAC)  
2011-12 Annual Report to the State Board of Education and the  
Education Committees of the Senate and House of Representatives**

*July 1, 2011 - June 30, 2012*

**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 2011-12, EDAC formally met ten times, conducted seven emergency reviews (e-mail and phone conferences) and in total reviewed 141 CDE data collections, down by 1.4% from the 143 data collections reviewed in 2010-11. Accomplishments include playing a greater advisory role with upcoming CDE projects and welcoming an EDAC human resources representative. In a special section at the end of this report, EDAC weighs the collection of attendance, discipline and course completion data at the student level.

**Accomplishments**

- Reviewed 141 CDE data collections, a slight decrease from 2010-11. 39 collections were closed or one time only collections from the previous year and 37 collections were new.
- Acquired subject matter expertise to assist EDAC in monitoring data and the associated tasks related to S.B. 10-191 concerning educator effectiveness
- Implemented practice of consistently reviewing State Board rules prior to approval
- Provided collaborative feedback to enhance departmental efforts such as Data Pipeline, Educator Effectiveness and Statewide Standard Course Codes
- Colorado Basic Literacy Act (CBLA) reporting was relocated, easing the burden of addressing student and assessment systems information within a single collection
- Continued an intensive schedule to meet the April 1<sup>st</sup> advance notice requirement of 22-2-306(3)(a), C.R.S. Nearly half (47%) or 66 collections were reviewed in March.

**Future Focuses**

- Heighten interaction with various CDE units, which are implementing assessments, the statewide IEP, differentiated graduation, data governance, educator effectiveness, the teacher-student data link and other important projects
- Encourage statewide forums on data system solutions to support reporting requirements
- Support the exchange of instructional data through the Data Pipeline
- Follow the implementation of Reading to Ensure Academic Development (READ) Act

## 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 extremely 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.

Over one-third (38 percent) of collections which EDAC reviewed in 2011-12 are labeled ‘Required to Obtain Benefit’. Over one-third (36 percent) are ‘Mandatory’ and one-fourth (26 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. Thirty-nine collections were discontinued from the prior year.

<b>Form Compliance</b>	<b>Mandatory</b>	<b>Required to Obtain Benefit</b>	<b>Voluntary</b>	<b>Total</b>
• <b>Full Review</b>	31	26	31	88
• <b>Update Approvals</b>	20	27	6	53
<b>Total Reviews</b>	51	53	37	141
• <b>Review Approval Withheld/Revoked</b>	0	0	0	0
• <b>No Approval Required</b>				3
• <b>Informational Briefings</b>				12
• <b>Small Collection</b>				3
• <b>Closed Collections</b>	6	28	5	39

**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 for various reasons. These may include that the collection was distributed prior to EDAC review, the requested data is already available, poor survey design or the collection is withdrawn for later EDAC reconsideration. EDAC also encourages the automation of data collection.

	<b>Approved No Changes</b>	<b>Approved With Changes</b>	<b>Not Approved Resubmit</b>	<b>Not Approved (No stamp issued)</b>	<b>Total</b>
<b>Review Outcomes</b>	73	57	11	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 because 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 twenty-one emergency reviews on seven separate occasions in 2011-12, expanding 250% from six emergency reviews on four separate occasions in 2010-11. EDAC is committed to minimize these in the upcoming school year.

	<b>Meeting Materials Submitted On-Time</b>	<b>Meeting Materials Submitted After Deadline</b>	<b>Emergency Reviews</b>	<b>Not Reviewed</b>	<b>Total</b>
<b>Review Preparation</b>	110	10	21	0	141

**Type of Collection.** The majority of EDAC reviews centered on existing CDE data collections. One-quarter (26 percent) of the data collections EDAC reviewed in 2011-12 were newly required through legislation or rule. The number of new collections slightly decreased to 37 in 2011-12, in comparison to 39 new collections in 2010-11. 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 2011-12.

	<b>New Collections</b>	<b>Existing Collections On-Schedule Reviews</b>	<b>Existing Collections First Time or Delayed Reviews</b>	<b>Total Reviews</b>
<b>Type of Collection</b>	37	104	0	141

## 2012 Legislative Follow-up

There were six legislative recommendations highlighted in the *Education Data Advisory Committee 2010-11 Annual Report*. House Bill 12-1240 primarily sponsored by Representative Andy Kerr, Senator Bob Bacon and Senator Keith King clarified the difference between an online ‘school’ versus ‘program’ and formalized the EDAC legislative review process. Two unaddressed recommendations regarding private schools and legal documentation for RITS have been withdrawn and the remaining two are carried forward within the current report.

## 2013 Legislative Recommendations

- **Adopt a feasible timeline for S.B. 10-191.** Colorado’s Great Teachers and Leaders Bill established new expectations for local personnel evaluation systems and required the State Board of Education to promulgate rules concerning the planning, development, implementation, and assessment of a system to evaluate the effectiveness of licensed personnel. The evaluation ratings generated will be reported to the state in the 2013-14 school year. There is much to be accomplished within a relatively short timeframe. EDAC provides these suggestions for consideration with the focus on SB 191 data collections that do not yet to have identified systems or processes to collect data:
  - **Concentrate on two job classifications.** Phase in adoption by beginning with teacher and principal evaluations only. Expand to other components later to allow more time for state pilots necessary to determine how to do collections that don’t have solutions yet (i.e., teacher – student link and how to attribute an individual student’s growth to one teacher).
  - **Obtain additional funds for improved data systems.** No data system exists to collect the level of granularity needed. Funding is not available to enhance data systems for the collection of the required data.
  - **Expand timeframe for educator effectiveness pilot.** Need additional time to consume feedback from pilot districts to make course corrections, especially to establish processes and practices regarding staff attribution associated with Educator of Record and Contributing Professional.
  - **Allow time to design content area assessments.** The lack of assessments in all content areas creates data burden of shared accountability for all teachers. Additionally, many current district assessments were not developed for the purpose of teacher evaluation and do not include defensible measures of growth at the classroom or teacher level.
- **Strengthen privacy protections for education evaluation data.** As the Great Teachers and Leaders Bill, S.B. 10-191, is implemented and processes behind educator effectiveness are addressed and privacy protection legislation is strengthened, EDAC recommends the provision of guidelines under which educator effectiveness ratings are made public. Strategies should suggest a minimum number of educators to prevent the

identification of an individual, take into account how the processes and reporting affect small schools and districts, spell out who can access individual evaluation data, and clarify how information from personnel records will be used.

- **Establish CDE authority to collect attendance, discipline and course completion data at the individual student level.** The special section on page six weighs the benefits and concerns and makes recommendations to mitigate possible issues.
- **Update requirement for 6<sup>th</sup> graders to register with College in Colorado (CIC) and for school districts to maintain interactivity between CIC and their data bases and student record systems (22-32-109 (nn) C.R.S.) [Recurrent].** While districts do not object to assisting students and their legal guardians to develop and maintain individual career and academic plans (ICAPs) by the ninth grade, it is an administrative and instructional burden to require 6<sup>th</sup> grade students to register with CIC. There are multiple systems through which districts can implement ICAPs, and imposing a direct CIC system to local education agency student system connection places an undue burden on districts which have chosen to utilize a different product. This directive is incompatible with Colorado's long history of local control that allows districts to determine which products will best enable the creation and ongoing success of ICAPs. Therefore EDAC recommends that the legislation be revised to require that 6<sup>th</sup> graders register within a system to support ICAPs and make the CIC registration and interconnectivity optional.
- **Consider expanding classifications for online [Recurrent].** As the state continues to expand instructional options for students, legislation or rule should broaden the categories under which students are placed for funding and accountability purposes. Currently online students go into one of two buckets- online or not online. As local education agencies increasingly provide students with blended online, traditional and other innovative instructional strategies, the categorization becomes blurred.

## **The Education Data Advisory Committee (EDAC) Weighs the Collection of Student-Level Attendance, Discipline, and Course Completion Data**

The Colorado Department of Education (CDE) has committed to provide service and support to local education agencies. CDE is working to provide meaningful data to educators that lead to wise instructional decisions resulting in college and career ready students. EDAC recognizes the tremendous potential of the data pipeline and has discussed benefits and concerns around collecting student-level attendance, discipline, and course completion data.

Potential benefits of these data include the development of Early Warning Systems to identify students at risk of failing or dropping out. Using student identifiers, data could be combined across schools and districts to determine trends and patterns in discipline and attendance. CDE could calculate information such as numbers of habitually truant students and attendance rates directly from the reported data. Course completion information, though never before reported to the Department, may fit within the upcoming Teacher Student Data Link. Additionally, the department could serve as a conduit for transcripts if grades were collected. The burden of transferring these data could shift to CDE.

Concerns expressed by EDAC include the magnitude (e.g. the number of attendance records per day per student) and the sensitive nature (e.g. specifying youth risk behaviors resulting in disciplinary action) of the data. Data elements may not be comparable, as definitions in many areas are not consistent. For example, what constitutes an excused or unexcused absence varies by district and at times among schools. EDAC is therefore wary of the temptation that may exist to use these data for accountability purposes for a school or district.

In order to maximize the benefits and alleviate the concerns around student-level data, EDAC recommends the following:

- 1) The CDE, with support from EDAC should
  - a. Review the current Automated Data Exchange (ADE) student collections that are submitted in the aggregate, including attendance and discipline data.
  - b. Examine how such collections fit into the transactional flow of the Data Pipeline.
- 2) As CDE moves to new student level collections using the Data Pipeline, the State, through legislation or rule should:
  - a. Establish the authority, which would allow CDE to initiate the collection of student-level attendance, discipline, and course completion data with careful regard to the protection of individuals. (CDE could look to the Special Education discipline data as another complicated and sensitive collection that is currently being submitted at the individual student level to serve as a model for obtaining these data statewide.)
  - b. Develop data sharing agreements or Memoranda of Understanding between education agencies and the Department.
  - c. Provide protections through policies and practices across the Department to ensure appropriate release of student-level data and its subsequent use.
  - d. Engage the Department's Institutional Review Board and Data Management Committee in order to strengthen data protections and reduce the risks of unintended consequences of data collection and subsequent release. This is necessary to avoid improper comparisons, rankings, or research uses of the data.