



**Education Data Advisory Committee (EDAC)  
2009-10 Annual Report to the State Board of Education and the  
Education Committees of the Senate and House of Representatives**

*July 1, 2009 - June 30, 2010*

**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 department-proposed data collection procedures and recommends improvements. Each EDAC-approved CDE data collection is given a stamp which informs districts and BOCES whether the form is mandatory, required to obtain benefit or voluntary. CDE and other state forms without an EDAC stamp are not required to be completed.

In 2009-10, EDAC formally met ten times, conducted four emergency reviews (e-mail and phone conferences) and in total reviewed 136 CDE data collections, a 1.5% decrease over the 138 collections reviewed in 2008-09. Accomplishments include producing a mandated *Duplicative, Obsolete, Inefficient Reporting Requirements* report to the legislature by September 15, 2009. Discussed in a special section at the end of this report is a recommended process to improve EDAC's review of proposed Colorado legislation requiring local education agency data reporting.

**Accomplishments**

- Reviewed 136 CDE data collections, down from 138 in 2008-09. Thirty-four collections were closed and 32 collections were new or reviewed for the first time.
- Delivered *Duplicative, Obsolete, Inefficient Reporting Requirements* report to General Assembly on September 15, 2009 in accordance with 22-2-304(3)(b)(1) C.R.S.
- Provided financial, redundancy and necessity reaction prior to statutory or rule adoption (see special section **EDAC Legislative Review Process Recommendation**)
- Adopted an intense review schedule in 2009-10 to meet the April 1<sup>st</sup> advance notice requirement of HB09-1214. Over one-third (38%) or 52 collections were reviewed during two March meetings.
- Presented 2010 legislative follow-up and 2011 recommendation sections within this report

**Future Focuses**

- Implement an EDAC Notification and Action Process
- Create method for data custodians to provide feedback regarding collections
- Support the development of a future new generation P-20 data system
- Incorporate other agencies into data collection review
- Follow implementation of public transparency financial requirements of 22-44-304 C.R.S.
- Monitor data burden related to SB10-191 concerning educator effectiveness

## 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 two 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.

One-half (54 percent) of forms which EDAC reviewed in 2009-10 are labeled 'Required to Obtain Benefit'. One-third (32 percent) are 'Mandatory' and even fewer (14 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 limited data collection without EDAC review. Thirty-four 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>                      | 21               | 33                                | 6                | 60           |
| • <b>Update Approvals</b>                 | 22               | 37                                | 13               | 72           |
| • <b>Not Reviewed</b>                     | 0                | 4                                 | 0                | 4            |
| <b>Total Reviews</b>                      | 43               | 74                                | 19               | 136          |
| • <b>Review Approval Withheld/Revoked</b> | 0                | 0                                 | 0                | 0            |
| • <b>No Approval Required</b>             |                  |                                   |                  | 4            |
| • <b>Informational Briefings</b>          |                  |                                   |                  | 14           |
| • <b>Small Collection</b>                 |                  |                                   |                  | 5            |
| • <b>Closed Collections</b>               | 5                | 21                                | 8                | 34           |

**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 with some minor adjustments, others with more detailed concerns 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 encourages the automation of data collection. There were two collections which became more automated' one converted from a manual paper process to an electronic format, the other advanced from a database to an automated data exchange format.

|                        | Approved<br>No Changes | Approved With<br>Changes | Not<br>Reviewed | Not Approved<br>(No stamp issued) | Total |
|------------------------|------------------------|--------------------------|-----------------|-----------------------------------|-------|
| <b>Review Outcomes</b> | 106                    | 26                       | 4               | 0                                 | 136   |

**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 five emergency reviews on four separate occasions in 2009-10, down from six emergency reviews on three separate occasions in 2008-09 and is committed to keep these to a minimum in the upcoming school year.

|                           | Meeting Materials<br>Submitted<br>On-Time | Meeting<br>Materials<br>Submitted After<br>Deadline | Emergency<br>Reviews | Not<br>Reviewed | Total |
|---------------------------|---|---|----------------------|-----------------|-------|
| <b>Review Preparation</b> | 112                                       | 15  | 5                    | 4               | 136   |

**Type of Collection.** The majority of EDAC reviews centered on existing CDE data collections. One-fifth (22 percent) of the data collections EDAC reviewed in 2009-10 were newly required through legislation or rule. The number of new collections decreased 17 percent to 30 over the 36 newly required collections in 2008-09. 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. The number of these delayed reviews decreased dramatically from six to two since 2008-09.

|                           | New<br>Collections | Existing Collections<br>On-Schedule Reviews | Existing Collections<br>First Time or Delayed<br>Reviews | Total<br>Reviews |
|---------------------------|--------------------|---|--|------------------|
| <b>Type of Collection</b> | 30                 | 104   | 2  | 136              |

## 2010 Legislative Follow-up

There were seven legislative citations EDAC recommended for possible elimination in the **Duplicative, Obsolete, Inefficient Reporting Requirements- 2009 EDAC Report to the General Assembly**. House Bill 10-1171 primarily sponsored by Representative Debbie Benefield addressed each of these.

- Four citations regarding specific dropout collection requirements which were obsolete or not used were deleted.
- One citation regarding school level definitions was repealed.
- The adopted annual budget requirements found in 22-44-111(3) C.R.S. were repealed but increased public transparency financial requirements of 22-44-304 C.R.S. (HB 10-1036) expanded district reporting burden. EDAC will closely monitor implementation of the new legislation.
- The reporting requirements for the Colorado Basic Literacy Act (CBLA) were greatly simplified in legislation and were further clarified in board rules (1CCR301-1-11.04(B)) regarding accountability indicators in school, district and state performance reports. The Colorado Department of Education has subsequently decided to keep the CBLA data collection fields constant for the 2010-11 school year, but has convened an internal cross-unit committee headed by Deputy Commissioner Diana Sirko to address EDAC concerns.

## 2011 Legislative Recommendations

- **Non-public school information (22-1-114 C.R.S.).** The burden of reporting non-public school information (22-1-114 C.R.S.) should be shifted from school districts to the non-public schools. It is recommended that legislation be enacted that requires all non-public schools to identify themselves to the Colorado Department of Education within a given timeframe at the beginning of a school year. This information can in turn be provided to districts in an expedient manner for federal program purposes.
- **Stability calculation (22-11-503(3)(d)(III) CR.S.).** While the requirement of the stability rate should remain, the calculation portion is obsolete. In 2009-10 the department eliminated the field to produce the legislated 4-month-stability rate (Oct. 1 to Feb. 1) in favor of using existing data to produce an 8-month-stability rate (Oct. 1 to the end of school year).
- **Formalize EDAC Legislative Review Process (22-2-304 C.R.S.).** Alter statute language to require Office of Legislative Legal Services drafter interaction with EDAC officers for the provision of reaction to proposed Colorado legislation containing local education agency data requirements.

## **EDAC Legislative Review Process Recommendation**

One of the Education Data Advisory Committee's major assignments since its 2002 inception has been to review school district and school data reporting requirements. Typically, EDAC has first responded to these reporting requirements once the CDE staff members responsible for gathering the data have finalized their collection instrument. Legislation passed in 2009, House Bill 09-1214, hastens this process by requiring EDAC to provide financial, redundancy and necessity reaction prior to statutory or rule adoption. Specifically 22-2-304(2) (d), C.R.S. states that the EDAC shall:

*review all proposed statutory and regulatory data reporting requirements, whether proposed in state or federal legislation or in rules, and, to the extent practicable prior to final adoption, inform the general assembly or the enacting state or federal agency of the estimated cost to the school districts and public schools of complying with the proposed statutory and regulatory data reporting requirements and make recommendations to the department general assembly or to the enacting state or federal agency concerning whether the proposed requirements are already included in existing law or regulation and whether the proposed requirements are necessary and appropriate;*

EDAC forged its way through implementing this new task during the 2010 Colorado legislative session. However, the process was inconsistent depending on the proposed legislation requiring district data reporting. Certain legislation could be considered a "hot topic" and would be discussed at each meeting. Other legislation was brought up when an EDAC member had particular interest in a bill. Some legislation with data reporting requirements may not have been reviewed. The EDAC chairperson, secretary or other member may have provided EDAC's reaction to a legislator, the bill drafter, a lobbyist, the CDE legislative liaison or the CDE contact assigned to follow particular legislation. A more formalized process seems to be in order.

EDAC members discussed the Colorado legislative review process in June 2010 and debated the best way to make it consistent. Given the multiple options that presented themselves during the inaugural legislative season, the committee felt that a process involving a partnership between EDAC officers (chairman/secretary) and bill drafters makes the most sense. Drafter participation guarantees that EDAC feedback is passed along to legislative sponsors. The process should not involve lobbyists who may have particular viewpoints regarding certain legislation with LEA data requirements. Nor should the process be closely linked to the legislative actions of the Department or State Board of Education which may or may not support various bills. The EDAC chair tried to informally set up a partnership between EDAC and drafters, but it was suggested that such a relationship should be legislated.

***EDAC Recommendation:*** *Alter 22-2-304 C.R.S. in the 2011 session to require legislative drafter interaction with EDAC officers for the provision of financial, redundancy and necessity reaction to proposed Colorado legislation containing LEA data requirements. A role clarification might include language such as "the office of legislative legal services shall notify EDAC of all proposed statutory data reporting requirements, receive EDAC recommendations and inform appropriate members of the general assembly of EDAC recommendations."*