Education Data Advisory Committee (EDAC)
2020-21 Annual Report to the State Board of Education and the
Education Committees of the Senate and House of Representatives

July 1, 2020 - June 30, 2021

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 2020-21 EDAC formally met ten times, conducted eight emergency reviews (via five e-mails and one virtual meeting) and in total reviewed 179 CDE data collections, a five percent decrease from the 189 collections reviewed in 2019-20. Accomplishments include successfully piloting a biennial review process, eliminating the duplicate collection of district utilized systems, and initiated collaboration on improving the Unified Improvement Plan process. In a special section at report end, EDAC lists the benefits and challenges of a K-12 public education data repository.

Accomplishments

- Reviewed 179 data collections, ten less than in 2019-20. From the previous year, 12 collections were one time only or closed collections, and 23 collections were new this year. Regarding the decrease, several collections were put on hold due to the pandemic.
- Piloted biennial stamp process for static collections, reducing EDAC customer data burden
- Eliminated duplicate collection of Student Information and Nutrition Systems information
- Commenced a shared re-envision process to assist with streamlining the Unified Improvement Plan
- Initiated a monthly process to scrutinize collection authorizations and requirements.
- Maintained focus on use of full Social Security Numbers (SSNs) in data collections
- Demonstrated flexibility to address pandemic-related grants/collections which included emergency reviews
- Successfully continued a virtual meeting environment due to the COVID-19 pandemic
- Strengthened membership by reflecting on representation and diversity
- Continued an intensive schedule to meet the April 1st advance notice requirement of 22-2-306(3)(a), C.R.S. Almost a quarter (24.6%) or 44 collections were reviewed in March.

Future Focus Areas

- Expand biennial process pilot to full implementation
- Create an EDAC process to address when another agency wants to collect data from districts, possibly data that already exists
- Continue to advocate for the elimination of Social Security Numbers
- Monitor the creation of new preschool agency, combining units from multiple state agencies
- Provide improved remote meeting options to increase meeting participation and maintain business flow
- Increase communication about EDAC and data life cycle within local education agencies

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.
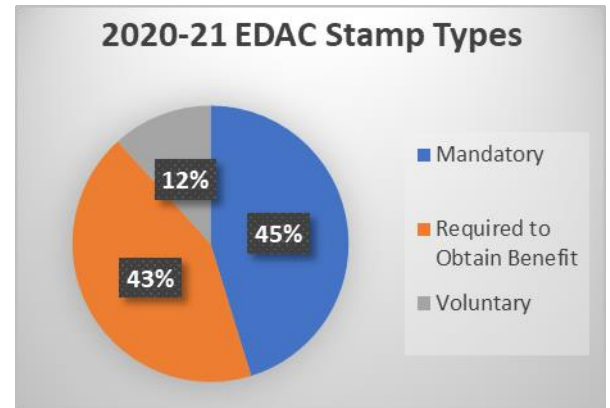
Two-fifths (43%) of collections which EDAC reviewed in 2020-21 are labeled 'Required to Obtain Benefit'. Almost half of collections (45%) are 'Mandatory' and more than one-tenth (12%) are 'Voluntary'. In 2020-21 mandatory percentages went up and voluntary went down compared to 2019-20 reviews. If districts 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. Twelve collections were discontinued from the prior year, including one-time only surveys or items that were incorporated into related or parent collections. EDAC initially reviewed 34 static forms that rarely change as part of a pilot to reduce CDE data burden.

Form Compliance	Mandatory	Required to Obtain Benefit	Voluntary	Total
• **Full Review**	48	35	9	92
• **Update Approvals**	33	42	12	87
Total Reviews	81	77	21	179
• **Review Approval Withheld/Revoked**	0	0	0	0
• **No Approval Required**				0
• **Informational Briefings**				2
• **Small Collection**				0
• **Closed Collections**	1	5	6	12

• **Biennial Review Pilot**	21	11	2	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 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 requested data is already available, the survey is poorly designed or the collection is withdrawn for later EDAC reconsideration. The Unified Improvement Plan was a collection that EDAC targeted for the shared re-envision process in the 2020-21 school year and conversations continue. As a result of EDAC encouraging automation, one data collection was enhanced by moving from a narrative completion to fillable application.

	Approved No/Few Changes	**Approved With Changes**	**Not Approved/Resubmit**	**Not Approved Overruled**	**Not Approved** (No stamp issued)	**Total**
Review Outcomes	132	47	0	0	0	179

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 eight emergency reviews on six separate occasions in 2020-21, increasing from six emergency reviews on two separate occasions in 2019-20. 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	164	7	8	0	179

Interpretation: 4% 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 (87%) were existing CDE data collections. Thirteen percent of the data collections EDAC reviewed in 2020-21 were newly required through legislation or rule. The number of new collections decreased from 29 in 2019-20 to 23 new collections in 2020-21. EDAC makes every effort to identify and bring to the table those CDE data requestors not yet familiar with the EDAC review process and there was one delayed review this year.

	New Collections	**Existing Collections On-Schedule Reviews**	**Delayed Reviews**	**Total Reviews**
Type of Collection	23	155	1	179

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.

2021 Legislative Follow-up
EDAC limited its recommendations to three due to the pandemic. First, no action was taken to repeal the Principal Preparation Program Survey. EDAC and CDE will continue to collaboratively work together to eliminate this duplicative reporting requirement from Colorado statute. Secondly, COVID-19 priorities impacted the ability of the General Assembly and CDE to collaborate to ensure collections are limited to legislative intent. Thirdly, although Kindergarten Readiness Assessments were not repealed, the State Board of Education acted in March 2020 to make kindergarten readiness reporting more relevant and meaningful to local education agencies. The same three recommendations are repeated below since minimal progress was made.

2022 Legislative Recommendations
- **Repeal the Principal Preparation Program Survey.** Eliminate Principal Preparation Program Survey by repealing State Board of Education additional duties from 22-2-109(7) C.R.S. The collection is no longer conducted by the department due to its duplicative nature with the four principal quality standard and one overall effectiveness ratings and the principal measures of student learning collected within the Human Resources collection.
- **General Assembly and CDE Collaborate to Ensure Collections are Limited to Legislative Intent.** Legislative processes should be implemented to ensure that the department doesn't overextend data collection requirements beyond legislative intent. The department should work in partnership with the General Assembly to confirm that the data collection design is limited to that required by legislation and is not expanded beyond the original objective.
- **Repeal Kindergarten School Readiness Assessments.** Eliminate Kindergarten School Readiness requirements by repealing 22-7-1004 C.R.S. Local education agencies continue to assert the huge burden imposed by the assessments required to determine school readiness for students below six years of age. Parents and guardians have made the decision to send these children to school and yet they are younger than the minimum age to meet compulsory attendance requirements. This misalignment doesn't justify the time-intensive testing and associated reporting.
- **Extend Privacy Law to New State Preschool Agency.** As a new agency is established from units that focus on young children from various existing state agencies, data privacy afforded other students needs to be in place. The Student Data Transparency and Security Act, 22-16-101 C.R.S. should be expanded to include this newly created state agency and the children it serves.
- **Define Responsibility for Part C Evaluations.** Local education agencies understand that they will no longer be responsible for evaluating the birth to three-year-old children under the new state preschool agency for Special Education services. However, it is not clear who will have this authority.

Following is the special section mentioned at the beginning of this report which describes a proposed PK-12 data repository for local education agency use.

CDE PK-12 Public Education Data Repository for Local Education Agency Use

To assist efficiency at the local level and to reduce Colorado Department of Education staff time in answering common questions, EDAC members discussed the addition of a repository of local and state PK-12 public education data. This repository would house local education agency historical data along with state totals or averages. Such a departmental repository would allow a district to access a variety of data to create reports and answer local board or leadership inquiries. It would allow for across district and state comparisons. A recommendation was made that the system should incorporate a way to isolate charter schools given their unique relationship with authorizers. In its deliberations, EDAC members weighed the advantages and disadvantages of a data repository.

Benefits:

CDE Centralized Technology. A PK-12 education data repository would be a one stop shop for district data needs. A standard interface would assist local education agencies in finding what is needed.
Return on Investment. Once developed this data source would save time for both districts and the department.   The broad array of data would allow districts to locate pertinent data to address the question(s) at hand.
Multiple LEA Uses. Preparing budget reports, conducting district negotiations, and building curricula are examples of how local education agencies could utilize this product. Additionally, questions from boards of education could be researched through this resource.
Data accuracy. As increased usage occurs, the quality of the data will be improved over time. As districts utilize the data and note how certain data points appear incorrect, more attention will be paid to improving local education agency data submissions.

Challenges/Risks:

Cost/Resources. A large investment of money and staff/vendor resources would be needed for the Colorado Department of Education to create a comprehensive PK-12 education data repository.
Security. Having this significant amount of data available to local education agencies in one place would require tight protections for access. CDE's Identity Management (IDM) process streamlines the user login process for CDE data systems and enhances security to protected data. It automates the user registration, approval, and password reset processes and provides districts and administrative units with the ability to maintain users via a Delegated Administration model.
Timing. This undertaking would take several years to build and perfect. Without additional resources, the department would have to spread repository tasks out and prioritize among other projects. This item should be commenced after CDE has completed public data reporting efforts.
Data quality. Accuracy, reliability, and comparability of the data would be questioned as the product was first rolled out and being utilized.   Again, data utilization improves local data quality as inconsistencies are observed.
Level of Support. Backing for a repository is unknown. Larger districts may already have resources to obtain data and smaller districts may not have the time to utilize given the number of hats individuals wear. A survey may need to be conducted to ensure that a PK-12 public education data repository would be supported statewide.

The idea of a PK-12 education data repository was raised at EDAC's June 2021 summer retreat. Members obviously didn't have time to explore the topic in depth. The pros and cons highlighted above warrant further discussion and deliberation of the proposal.