

**Education Data Advisory Committee (EDAC)
2021-22 Annual Report to the State Board of Education and the
Education Committees of the Senate and House of Representatives**

July 1, 2021 - June 30, 2022

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-reviewed 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 2021-22 EDAC formally met ten times, conducted ten emergency reviews (via five e-mails and three virtual meetings) and in total reviewed 212 CDE data collections, an 18 percent increase from the 179 collections reviewed in 2020-21. Accomplishments include successfully implementing a biennial review process, changing protocols to meet expectations of the sunshine law, and initiating collaboration to improve the graduation guidelines portion of the student interchange. In a special section at report end, EDAC describes how it will increase transparency to the field by revising its stamp and processes.

Accomplishments

- Reviewed 212 data collections, 33 more than in 2020-21. From the previous year, eight collections were one time only or closed collections, and 39 collections were new this year. Regarding the increase, several pandemic-related collections allowed districts to obtain additional program funding.
- Implemented biennial review process for 27 collections that rarely change.
- Revised EDAC stamp to better reflect advisory committee's role and strengthened processes when EDAC and CDE differ in collection support.
- Altered protocols to meet sunshine law expectations.
- Commenced a shared re-envision process to assist with streamlining the Student Interchange, specifically the Graduation Guidelines file.
- Demonstrated flexibility to address pandemic-related grants/collections, including emergency reviews.
- Maintained focus on need to minimize use of full Social Security Numbers (SSNs) in data collections.
- Ended legislative sunset process for EDAC.
- Continued an intensive schedule to meet the April 1st advance notice requirement of 22-2-306(3)(a), C.R.S. More than two-fifths (42.7%) or 91 collections were reviewed at the March meetings.

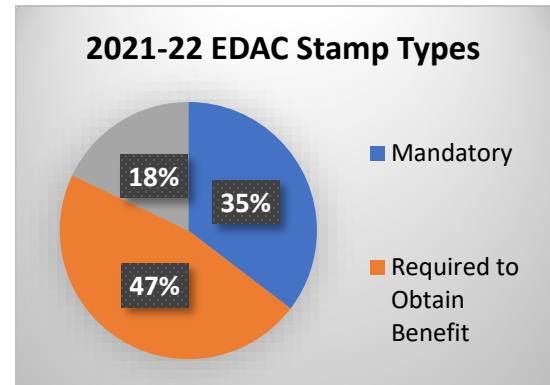
Future Focus Areas

- Work with the recently established Department of Early Childhood to review local education agency collections.
- Monitor how the Department of Early Childhood will collect early childhood data for readiness assessments.
- Increase awareness about EDAC through updates on the EDAC page of the CDE website, utilizing CDE monthly communications such as the Source, and inviting staff and administrators to meetings.
- Create EDAC protocol for State Board information sessions as required by amendments to the EDAC sunset law.
- Promote the expansion of capstone definition within the Graduation Guidelines Menu of Options.

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 review 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 reviews 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.



Almost half (47%) of the collections which EDAC reviewed in 2021-22 are labeled ‘Required to Obtain Benefit’. A third of collections (35%) are ‘Mandatory’ and almost two-tenths (18%) are ‘Voluntary’. In 2021-22 required to obtain benefit and voluntary percentages went up compared to 2020-21 reviews. If districts or BOCES are interested in securing specific 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. Eight collections were discontinued from the prior year, including one-time only surveys or items that were incorporated into related or parent collections. EDAC reviewed 27 static forms that rarely change as part of a biennial process to reduce CDE data burden.

Form Compliance	Mandatory	Required to Obtain Benefit	Voluntary	Total
• Full Review	18	33	17	68
• Update Review	36	60	21	117
• Biennial Review	21	6	0	27
Total Reviews	75	99	38	212
Discontinued Collections				
• Review Approval Withheld/Revoked	0	1	0	1
Other Collections				
• No Vote Required				0
• Informational Briefings				5
• Small Collection				0
• Closed Collections	0	4	4	8

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 READ teacher training collection was not approved. The Student Interchange, specifically Graduation Guidelines was a collection that EDAC targeted for the shared re-envision process in the 2021-22 school year and conversations will continue in 2022-23. The shared reenvision process for the Unified Improvement Plan continues. As a result of EDAC encouraging automation, one collection was enhanced by moving from a paper collection to an online fillable form.

	Approved No/Few Changes	Approved With Changes	Not Approved/Resubmit	Not Approved Overruled	Not Approved (No stamp issued)	Total
Review Outcomes	198	13	0	1	0	212

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 reviews are discouraged, but 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 ten emergency reviews on eight separate occasions in 2021-22, increasing from eight emergency reviews on six separate occasions in 2020-21. 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	199	3	10	0	212

Interpretation: 1.4% 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 (81%) were existing CDE data collections. Nineteen percent of the data collections EDAC reviewed in 2021-22 were newly required through legislation or rule. The number of new collections increased from 23 in 2020-21 to 39 new collections in 2021-22. 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 were no delayed reviews this year.

	New Collections	Existing Collections On-Schedule Reviews	Delayed Reviews	Total Reviews
Type of Collection	39	173	0	212

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.

2022 Legislative Follow-up

Limited progress was made on EDAC's five 2022 legislative recommendations. The responsibility for evaluating birth to three-year-old children for Special Education services (Part C) was moved from local education agencies to the Department of Human Services beginning May 1, 2022. No action was taken on two recommendations. First, to repeal the Principal Preparation Program Survey and continuing to focus on collections being limited to legislative intent. EDAC supports the repeal of Kindergarten Readiness Assessments and extending privacy laws to the new Department of Early Childhood. Therefore, those two prior year recommendations are repeated below.

2023 Legislative Recommendations

- **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 Department of Early Childhood.** The Student Data Transparency and Security Act, 22-16-101 C.R.S. doesn't currently apply to the recently created Department of Early Childhood. Privacy protections afforded other students should be extended to the young children served by this new Colorado agency.
- **Alter the READ Law to Simplify Teacher Training Evidence Reporting.** EDAC provided feedback that the Reading to Ensure Academic Development (READ) legislation would be most effective if tracking teacher literacy training was the responsibility of local education agency human resources staff as opposed to the Colorado Department of Education
- **Legislate a Study Group to Determine Value of Data Collections to LEAs.** Local education agencies (LEAs) continue to be burdened by the provision of a large amount of data to the Colorado Department of Education. The Colorado General Assembly is encouraged to address data burden by re-evaluating existing collections. As a starting place, the high burden and low benefit state collections as reported within the *2017-18 EDAC Data Burden Survey* include the Colorado Continuous Improvement Process Indicator 14 Post-School Outcome Data, Unified Improvement Plan (UIP), Human Resources, School Discipline and Attendance, Special Education Discipline, and Teacher Student Data Link (TSDL). Please note that the School Discipline and Attendance collection may be altered as a result of the passing of HB-22-1376, Supportive Learning Environments For K-12 Students.
- **Critical Review of matriculation data collection and usage as an accountability measure** LEAs and the state of Colorado generally struggle to collect accurate data related to the matriculation of students into post-secondary college or career activities. The data burden and costs in state employee time and resources outweighs the benefits of this data collection. EDAC urges the legislature to critically review matriculation data legislation related to the school or district performance framework and the appropriateness, necessity, or inefficiency of this data and consider the repeal or amendment of this statutory reporting requirement, or commission a review through stakeholder engagement.

- **Repeal or Amend the Higher Bar Legislation (SB17-272)** The higher bar legislation presents a burden on LEAs given the scope of the data collected. The value of the data collection does not provide for a meaningful evaluation, and the data collected and the cut scores do not provide a quality evaluation for the school or district performance frameworks. EDAC recommends the Higher Bar legislation be repealed, amended to identify metrics that are the most appropriate, or commission a review through stakeholder engagement.

Following is the special section mentioned at the beginning of this report which describes how EDAC modified its stamp and processes to increase field transparency.

EDAC Revises Stamp and Processes to Increase Transparency

Education Data Advisory Committee (EDAC) members noted that transparency to local education agencies was lacking when the committee voted against a data collection. Two changes to EDAC processes were made, with a goal of increasing visibility regarding data concerns across Colorado. First, the EDAC stamp affixed to each collection that is distributed to the field will clearly indicate when the committee has concerns. Second, a legislatively required State Board of Education (SBE) information session will now be available to allow public discussions regarding differences between EDAC and the Colorado Department of Education (CDE) recommendations. Additionally, the EDAC shared re-envision process increases committee knowledge of collection details. In the long run the hope is that clarified data elements are widely shared, collection concerns are more broadly understood and communicated, and data burden is reduced.

EDAC Stamp. Although extremely rare, the protocol provides that an EDAC-denied data collection be forwarded to CDE's Executive Team for further consideration and requires a formal written response be supplied to committee members if the collection is overturned. This correspondence documents the reasons why the collection would move forward as originally presented. The prior protocol called for the collection to be distributed to the field with the usual EDAC stamp relaying collection compliance information, the form number, the EDAC collection review date, and the school year(s) to which the collection applies. Although EDAC members could forward CDE's communication regarding the overturn to let constituents know that the committee had not supported the collection, many in the field could miss the conceptual differences between EDAC and CDE, unless that information is shared with them by their EDAC representative. Thus, a revised EDAC stamp was born. Rather than stating that a collection is 'EDAC Approved', the new indication will be 'EDAC Reviewed'. When EDAC now votes against a collection, the stamp will display 'EDAC Reviewed with Concerns'. As part of the new process, EDAC will purposefully record the reasons why it doesn't support the collection and that will be submitted to CDE's Executive Team as it deliberates and provides its response. The new stamp, indicating that concerns were present, provides clear notification to the field that the collection was not EDAC supported.

SBE Information Session. Within House Bill 22-1265, Sunset Education Data Advisory Committee, which repealed the need for periodic reviews by the Department of Regulatory Agencies, a provision was added that requires the State Board of Education to conduct an information session with public input when EDAC issues a collection with a 'Reviewed with Concerns' stamp. Such a session allows for EDAC and the Department to discuss their perspectives in a public forum and more broadly communicate data collection concerns. This session will be scheduled by the Department's Director of State Board Relations as soon as is practical for the State Board of Education.

Shared Re-envision Process. In 2018-19 EDAC implemented a proactive process to team up with data collection leads and subject matter experts to address data concerns when it had identified that the collection would likely not be supported at its next review. This shared re-envision process is initiated when EDAC or CDE staff identifies a collection that is challenging or flagged as significantly contributing to district data burden. The intent has always been to achieve a solution-oriented approach to reduce data burden. During this process, EDAC members collaborate with CDE collection and related subject matter experts to document concerns, obtain data element rule and regulation information, attain a legal review, survey the field, acquire collection modification suggestions, offer downstream impacts of collecting versus not collecting the data in question, obtain Commissioner feedback, and create iterative updates to the collection instrument. The result is a comprehensive understanding of the collection whether no change or a total overhaul is recommended before the mutually agreed upon item returns to EDAC for its regularly scheduled review. It is hoped that employing this process when, or before, a concern is raised, will lessen the need for the new EDAC stamp stating that EDAC has reviewed a collection with concerns.

The new EDAC stamp, State Board information session, and shared re-envision process will allow greater communication about education data collections and increase transparency when concerns are present. Increased collection information adds to the richness of the conversation and better directs the outcome. The intent of these recently revised EDAC processes is to increase understanding and ultimately lead to data burden reduction for local education agencies.