
2017-18 EDAC Data Burden Survey

An Empirical Analysis of Colorado Local Education
Agencies on Data Reporting Burden, Collections
and Submissions



EDUCATION DATA ADVISORY
COMMITTEE (EDAC)

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Commendation Note: EDAC members would like to recognize a few members for their contributions to this study. Former member Wendy Wyman and Ruth Grindelund were the inspiration behind the survey. Not only did Ruth suggest gathering empirical evidence regarding data burden, but also created much of the survey for distribution. Norman Alerta took the challenge of analyzing the survey responses. He scoured the data to bring the most promising data forward to the committee. Mike Porter is credited for suggesting the utilization of the quadrant tool for visualizing the data. Nikki Johnson and Janet Dinnen spent time and effort on providing comments to highlight differences between small and large local education agencies. Thanks from your fellow EDAC representatives!

Introduction

Educational data is imperative to support student learning and success. Data is a valuable asset to the mission of education and utilized by a variety of public consumers. There has been an ongoing, yet growing, conversation about the reduction of resources directed to student instruction as well as the increasing data reporting requirements on local education agencies (LEAs). The Education Data Advisory Committee (EDAC) decided to survey LEAs to evaluate the extent to which the ‘data burden’ is real, quantify the level of effort LEAs exert to collect and submit data, and how these findings relate to past and current EDAC recommendations. For the first time, quantitative data is available from which informed decisions can be made.

Results from EDAC’s survey confirm that data burden is real. It is a burden felt across LEAs of all sizes and in all regions of the state, and it is pushing limits of the available resources in small and rural districts.

In response to the findings and in line with its statutory role, EDAC offers recommendations and considerations to strategically address data burden. Recognizing that LEAs offer one perspective on the topic, albeit one extremely important viewpoint, EDAC proposes a collaborative approach to reducing data burden that considers the input of multiple stakeholder groups.

Readers of this report, whether members of the State Board of Education, the Colorado General Assembly, the Colorado Department of Education, an LEA or education partners will have different roles to play in addressing data burden, and all are encouraged to play their respective roles in evaluating any new proposed data collections and consider the impact, as well as in re-evaluating existing collections.

What is EDAC?

The Education Data Advisory Committee is a statewide representative group of school, BOCES, and district volunteers, which reviews all Colorado Department of Education 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.

A Collaborative Path Forward

While EDAC offers both collection and process-specific recommendations to address data burden, it would like to highlight a broader recommendation for moving forward: collaborate with key stakeholders when considering each of these recommendations.

Legislation is typically enacted to address a particular need or to monitor and evaluate a perceived problem, and data is necessary to let the public and legislators know whether the need or issue is being adequately addressed. For educational purposes, this typically results in data collection and reporting by the LEAs.

Using historic EDAC recommendations, CDE has already evaluated existing data collections and highlighted areas in which streamlining could help. Through this process, it became apparent that while removing an obsolete field from a collection would reduce LEA time on the collection, any significant time savings would be realized when entire collections are removed. Findings from the EDAC Data Burden Survey helped to hone in on existing collections that deserve additional review to see whether they can be adjusted to provide greater value or removed to reduce data burden (details later in this report).

Report Card March (RCM), Teacher Student Data Link, Kindergarten School Readiness Reporting, Principal Preparation Program Survey, and the Unified Improvement Process stand out as collections that may require additional review based on LEA feedback. EDAC's recommendation is to systematically evaluate each of these collections, determine what the data fields are used for, identify whether they are captured through other existing data collections or elsewhere, and analyze impacts of removing the collection. While the responses from LEAs on the data burden survey primarily informed its recommendations, EDAC recognizes that this process cannot be conducted by CDE alone, the districts alone, or even the legislature alone. This requires a collaborative process, with each participant contributing to the final conclusion.

As an example, collaborators would review Report Card March data collection as a whole, and then review each field separately, asking questions such as:

1. How was the data intended to be used? How is the data currently being used?
2. To what extent is this data available elsewhere (through other existing data collections or other public sources)?
3. To what extent is the resulting report or output valuable to legislators? State Board? Others?
4. To what extent does the importance outweigh the time to collect and report it?

Key stakeholder groups, including districts, data users, legislators, the State Board and CDE, should come together to fully examine the impact of repealing RCM as recommended in this report. It is proposed that a collaborative systematically review the specific collections identified in this Data Burden Survey for the purpose of recommending revisions or repeal of associated laws and rules.

Recommendations - Overview

EDAC released its Data Burden Survey in November 2017 to all local education agencies and broadly communicated its importance. The survey included mandatory and other select collections and invited respondents to rate the level of effort needed to complete each collection, the level of benefit the LEA obtained from each collection, and the number of staff and hours required to complete each data collection. EDAC received 137 representative replies for a 51.1% response rate.

In addition to valuable perspectives provided by LEAs, available CDE data was used to enrich our analysis. Costs for LEA staff to complete collections, for example, were calculated by using the average hourly pay for data collection respondents as reported on the 2017-18 Human Resources collection. EDAC utilized a data quadrant approach to display each collection's median person hour costs and whether, on average, LEA respondents felt the collection was beneficial.

It should be noted that there were several data collections identified as high benefit to LEAs, and EDAC notes that several of these collections are reviewed and adjusted regularly to ensure they are the most efficient in collecting the required data. The focus of this report will be on collections that were viewed as high effort and low benefit to LEAs. A listing of LEA ratings for each collection included in the survey, please see the Data Burden Survey Findings section of this report.

Based on LEA response, EDAC has offered the following recommendations. It should be noted that these recommendations are based primarily upon the LEA perspective. EDAC acknowledges that additional perspectives—i.e. other users of this data like researchers, taxpayers—should be considered when determining the most appropriate next steps for each recommendation.

- Staggered and strategic adjustment or elimination of four low-benefit/duplicative collections and the associated legislation and/or rule
- Regular review of reporting requirements with a careful examination of collections rated as low benefit
- Thoughtful deliberation when considering any new reporting requirement
- A one-year moratorium on additional collections while a collaborative workgroup determines a recommended plan for addressing data burden
- Consideration of ways to ease data burden at the state level, including a voluntary statewide student information system

The Colorado General Assembly, State Board of Education, Colorado Department of Education and other education agencies will find recommendations targeted to them. To focus attention on actions for specific audiences, repetition exists across recommendations. (Detailed information on each recommendation is included in the next section.) Although there are a number of suggestions, these do not need to be addressed at once. A coordinated and phased in approach may make addressing the recommendations less overwhelming than tackling them all immediately.

To be clear, EDAC's role as a voluntary body is defined in statute:

- Determine whether the benefits derived from a data collection outweigh the administrative burden of producing the data,
- Determine and recommend the most efficient ways of collecting data,
- Determine if recommendations for new data collections are redundant and propose alternatives, and
- Review data collection procedures and recommend improvements.

Accordingly, the recommendations offered in this report are aligned to one or more of these explicit responsibilities. EDAC recognizes that the Department, State Board of Education, and the Colorado General Assembly have ultimate authority to revise and rescind the statute and regulation associated with each recommendation in this report. EDAC hopes this report provides useful information when considering legislative and regulatory priorities in the current year and beyond. The Colorado Legislature, State Board and CDE need to work together to address data burden by:

1. Removing legal or regulatory requirements for duplicative and low benefit data collections,
2. Regularly reevaluating existing collections, and
3. Considering the impact of any new requirement, especially on rural districts.

Legislature

Repeal or Revise Low Benefit Collections

- Eliminate Report Card March by Repealing Performance Reports
- Eliminate Teacher Student Data Link (TSDL) by Repealing Commissioner Duties
- Revise Kindergarten School Readiness Reporting Requirements by Repealing School Readiness Assessment
- Eliminate Principal Preparation Program Survey by Repealing State Board of Education Additional Duties
- Limit UIP Process to Accredited with Priority Improvement or Turnaround

Reevaluate Existing Collections Regularly

- Sunset State-Required Reports and Submissions
- Evaluate Low Benefit Collections
- Implement a Temporary Moratorium on Data Collection
- Evaluate Operational Impact for New Collections
- Support Data Burden Relief
- Consider Legislation Creating Voluntary Statewide Student Information System (SIS)

State Board of Education

Remove Low Benefit Collection Rule Requirements

- Eliminate Report Card March by Removing Health and Wellness Rules
- Eliminate Teacher Student Data Link by Removing Board Rules
- Eliminate Kindergarten School Readiness Reporting
- Alter Administration of Statewide Accountability Measures - Limit UIP Process

Reevaluate Existing Collections Regularly

- Evaluate and Sunset Duplicative/Low Benefit State-Required Reports and Submissions
- Review Data Reporting Requirements in Rules
- Consider Staff and EDAC Data Recommendations Annually
- Evaluate Operational Impact for New Collections
- Support Data Burden Relief for Districts
- Support a Voluntary Statewide Student Information System (SIS)

Colorado Department of Education

Reevaluate Existing Collections Regularly

- Review Alignment of Reporting Obligations with Legislation Annually
- Evaluate Low Benefit Collections
- Evaluate Operational Impact for New Collections
- Support Data Burden Relief for Districts
- Limit UIP Process to Turnaround and Priority Improvement LEAs Only
- Integrate CDE Data Systems
- Assess Value of a Statewide Student Information System
- Present Annual Data Recommendations to State Board

Local Education Agencies and Other Stakeholders

General Suggestions

- Speak with Legislators and State Board Representatives about Data Burden Recommendations
- Provide Feedback and Suggestions to EDAC Members and CDE Staff
- Increase Participation in Fiscal Note Process

Detailed Recommendations

Eliminate Report Card March (RCM) Reporting

Report Card March is an annual collection that provides school descriptors such as course offerings, health and wellness information, and programs offered at the school for the purpose of public transparency that has been collected since the 2000-01 school year. Results of this collection are maintained on CDE’s SchoolView Data Center website.

EDAC first recommended the elimination of Report Card March (RCM), citing its lack of relevance, in its 2016-17 annual report. There is now empirical data to back this up: survey respondents rated this collection as low effort, low value. The collection is duplicative to, and less comprehensive than, the school descriptors already shared on many school, district, and education-related websites. Additionally, several fields—take the Dance flag, Physical Education flag, History flag, for example—are already being collected on the Standard Course Codes data collection, which is a more comprehensive collection than the Report Card March. Other than being a statutory requirement, it is unclear the usage of some fields being collected and whether they are in fact obsolete. Why, for example, is there Montessori flag to identify schools offering a Montessori model but not a flag for other educational models like Project-based learning, Core Knowledge, or College Prep?

Local education agencies expressed their opinions about the collection. One requested, “I would love to know how often this information is accessed on the state site. Pointless as far as district use.” Another stated, “This report is obsolete.” And another asked, “Why are we still collecting this information?”

Responses to the EDAC survey clearly indicate the little use of the collection for LEAs. Decision makers should consider the value each data element in this collection offers to the public and ways to utilize other existing collections to gather this information as several areas of duplication were identified by EDAC. That said, because of the strong evidence that points at the duplicative and obsolete nature of several elements within this collection, EDAC urges decision makers to consider EDAC’s recommendation for the 2018-19 school year and legislative session.

To eliminate Report Card March:

- **The Colorado Legislature will need to repeal C.R.S. 22-11-503(3)(f-g) Performance reports – Contents.**
- **The State Board will need to remove Health and Wellness- 1 CCR 301-1 11.05(G).**

Eliminate the Teacher Student Data Link (TSDL) Collection

The Teacher Student Data Link collection gathers information on the courses teachers taught, the courses students took and the outcomes of these courses for the purposes of improving instruction,

informing and increasing educator effectiveness, and supporting the continuous improvement of teaching and learning.

The EDAC Data Burden Survey results provide empirical data to support EDAC's 2016-17 recommendation to eliminate the Teacher Student Data Link. Respondents rated this collection as high effort, low value.

Survey respondents agreed that the Teacher Student Data Link was not utilized to its full potential. Comments included, "While we believe this data collection could be useful, we also believe this data collection could be harmful to individual educators if utilized incorrectly. We do not believe the data has been used with its intended use." Another shared, "I understand the concept of why we are collecting this data, but I have not seen anything of any value come back from this collection considering the amount of time it takes to do it."

Several respondents also commented on the low value they placed on this collection: "This is a time-consuming and complex submission that has no perceived value. We would be thrilled if CDE stopped requiring districts to complete this submission." Another stated, "This is an incredibly time consuming report for absolutely no use!"

It should be noted that adjustments have been made to this collection to reduce the burden on LEAs. In 2015-16, clarification was offered that limited the collection of course enrollment data to the tested subjects of math, science, social studies, and English Language Arts. In July 2018, Commissioner Anthes announced that the collection has been paused for the 2018-19 year as a result of feedback from the field with the intent to use the pause year to form a stakeholder workgroup to re-examine the collection procedures and explore possibilities for reducing data burden.

Based on LEA responses from the data burden survey alone, EDAC would recommend elimination of the collection. However, EDAC recognizes the importance of considering additional perspectives when evaluating the value of this collection and therefore recommends decision makers consider the findings from its data burden survey results in conjunction with the findings of the TSDL workgroup. Another alternative is to extend the 2018-19 pause on TSDL until a path forward is clear.

As the workgroup will likely not release findings until early in 2019, it may be prudent to consider a pause to the collection for the 2019-20 school year and reconsider EDAC's recommendation in conjunction with the workgroup's findings during the 2019-20 school year and legislative session.

To eliminate the Teacher Student Data Link Collection:

- **The Colorado Legislature will need to repeal commissioner duties- reviewing the content of educator preparation programs in Colorado, C.R.S. 22-2-112(p-q); Monitoring of Written Evaluation System, C.R.S. 22-9-106(1.5)(a-b); and Student Performance by Course Level, C.R.S. 22-11-503.5(I-II).**

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- **The State Board will need to remove rules for administration of a statewide system to evaluate the effectiveness of licensed personnel employed by school districts and boards of cooperative services 1 CCR 301-87(6.04)(i), (A), (C)(2)(b, d, and e), and (C)(3)(a).**

Eliminate the Principal Preparation Program Survey

The Principal Preparation Program Survey was initiated in 2017-18 to solicit information by which to measure quality and effectiveness of traditional and other alternative forms of principal preparation. While this collection did not meet the 25 respondent minimum, its duplicative nature is evident in that principal ratings from the Human Resources collection provide the necessary data to evaluate principal preparation program quality. Because this collection is outdated and redundant, EDAC recommended elimination of the collection in 2017-18 and within this report. One local education agency indicated, “The survey is designed very poorly. The district puts forth much time and effort in preparing our new principals for these positions.”

Because of the clearly duplicative nature of this collection, EDAC urges decision makers to consider this recommendation for the 2018-19 school year and legislative session.

To eliminate the Principal Preparation Program Survey:

- **The Colorado Legislature will need to repeal State board of education additional duties (superintendent survey) C.R.S. 22-2-109(7).**

Revise Kindergarten School Readiness Reporting

The Kindergarten School Readiness collection provides information on the levels of school readiness demonstrated by enrolled kindergarten students and measures improvement in students’ knowledge and skills over time. EDAC first recommended the elimination of the Kindergarten School Readiness Reporting in 2017-18 because it provides narrow information for policy decisions. One district shares, “Because reports provide only a count of domains a student is proficient in, rather than specific domain names, the report has limited to no value.” Survey respondents rated this collection as low effort, low benefit.

EDAC recognizes the importance of balancing student data privacy concerns with ensuring that required reporting provides meaningful data to inform decisions by educators, administrators, and policymakers and encourages additional conversation with stakeholders on how the existing school readiness reporting is being used to inform instruction or drive changes within schools and districts. Based on the current reporting requirements and lack of meaningful information they provide, EDAC recommends the elimination of school readiness reporting. Please note that EDAC fully supports, and would happily share recommendations for adjusting the existing report to provide more meaningful reporting about student readiness proficiency.

To eliminate School Readiness Reporting:

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- **The Colorado Legislature will need to repeal school readiness assessment C.R.S. 22-7-1004(2)(b) to eliminate Kindergarten School Readiness reporting requirements.**
 - **The State Board will need to eliminate Kindergarten School Readiness reporting consistent with current law, C.R.S. 22-7-1004(2)(b).**

Pursue the Use of a Statewide Student Information System

To address data burden, one recommendation was to thoughtfully consider a voluntary statewide Student Information System (SIS) as a cost-efficient option for LEAs. Currently, there are at least six different student information systems used across the 178 school districts in Colorado. A consolidated effort on such a system would create local savings on annual operational costs and fees as well as for training opportunities. Considering the significant costs to rural districts, this statewide system could lead to savings in time and effort to complete data collections over time.

EDAC would like to recognize the persistence of one LEA which included the following statement of support for a statewide student data system within each and every collection suggestion box, “Have a state hosted Student Information System. Provide training to schools to use the system. Then the state can pull this information when they want, and are not requiring schools to push this information to CDE!!!”

It should be noted that CDE released a request for proposal in September 2018 for a contractor to investigate the value of such a system in Colorado. EDAC recommends the state’s continued evaluation of a statewide student information system.

To consider a statewide student information system:

- **CDE should continue to assess the value of a statewide student information system.**

Integrate CDE Data Systems

While the EDAC Data Burden Survey didn’t survey respondents on the topic of integrated data systems, the need for this emerged as a theme across some respondents’ comments. One district commented in regard to the Human Resources collection, “Reporting of teacher and principal evaluation information could and should be uploaded from RANDA. Providing this information is redundant. Again, a central database would solve this problem. Changing field requirements cause a great deal of consternation.” A second commented, “Is licensure information available for teachers holding a Colorado license at CDE?”

The Department needs to utilize its vast array of information in a coordinated manner by integrating its diverse data systems or designing automated interfaces across systems. When any CDE program decides on a course of action involving a technology system purchase, that decision should be vetted by the technology division to ensure it fits into the overall enterprise plan for data management and availability.

To consider integrated data systems:

- **CDE should reflect on ways to integrate its data systems to increase reporting effectiveness and efficiencies to include special education, educator licensing/evaluations and federal systems data collection and reporting.**

Limit UIP Process Participation

The Unified Improvement Plan (UIP) streamlines federal and state improvement planning requirements for schools and districts. This submission was identified as a high effort, low benefit collection by LEAs. Some expressed frustration in completing the UIP for CDE when CDE only reviews UIPs of Priority Improvement and Turnaround schools. Others shared that they have other templates and processes for goal setting and progress monitoring at the school and district levels and that the UIP is a duplication of effort.

While some applauded the recent reductions to the UIP requirements—namely, the ability to pull in information from prior UIPs in the online format, and more recently, the ability to submit every other year for Performance schools—respondent comments suggest that more should be done to reduce this burden. One LEA complained, “The process has become too complicated and time consuming to be useful. CDE should consider pre-populating the achievement data.” Another stated, “Not very helpful as we use other data and information to actually plan for next year. The timing of this report and the results of the data we are required to analyze do not help as they do not correlate with our current practices.” EDAC members recommend that CDE staff explore additional ways to reduce data burden. Ideas shared included:

- only requiring this process for districts and schools on priority improvement and turnaround to lessen the impact of plan reporting on entities performing at expected levels
- reducing the sections within the UIP to be completed by higher performing schools
- allowing schools and districts the ability to submit existing strategic/improvement plans in their own formats

To limit the UIP process participation to schools rated Priority Improvement or Turnaround:

- **The Colorado Legislature will need to alter the Accredited or Accredited with distinction C.R.S. 22-11-303(1)(c) and Accredited with improvement plan C.R.S. 22-11-304(1)(c) legislation to require the submittal of the standard CDE-required Unified Improvement Plan (UIP) only for LEAs on priority improvement and turnaround.**
- **The State Board will also need to alter 1 CCR 301-1 Administration of Statewide Accountability Measures for the Colorado Public School System, Charter School Institute, Public School Districts and Public Schools to require CDE’s UIP process only for those local education agencies on priority improvement and turnaround.**

Evaluate Operational Impact for New Collections

The EDAC Data Burden Survey found that rural districts spend twice as much of their district overall budget on data reporting as larger districts (see **Figure 1 - Comparison of Data Submission Costs** below and details in Key Observations).

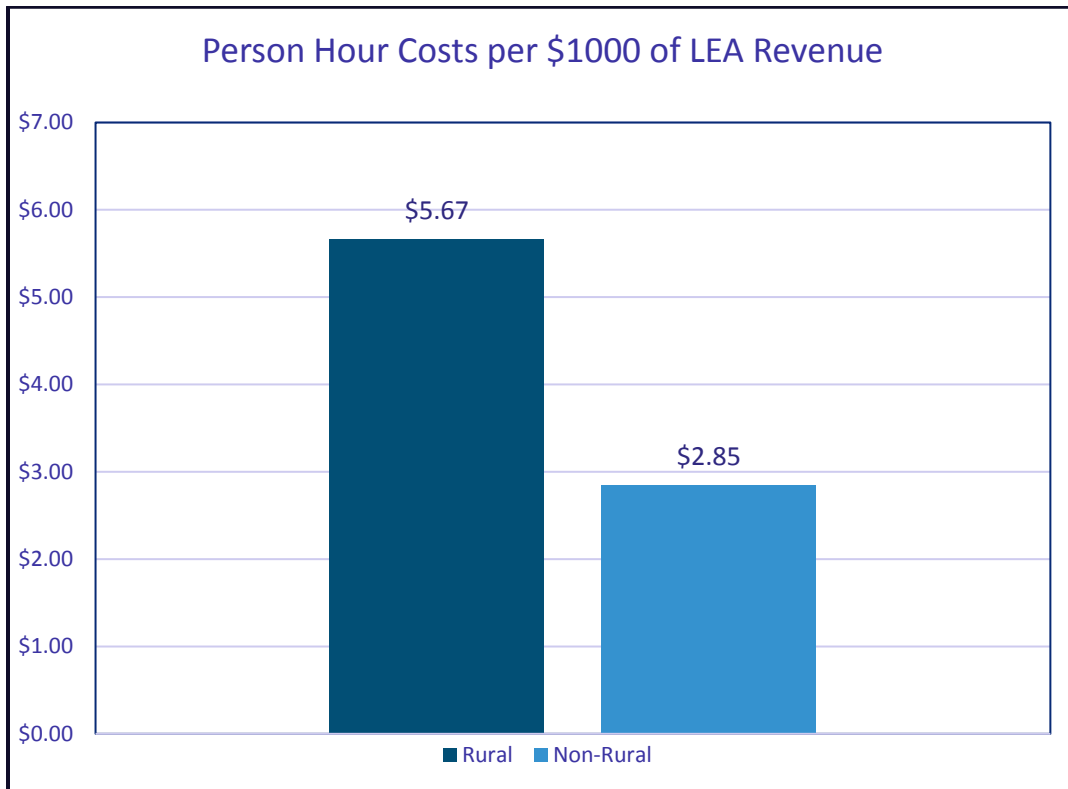


Figure 1 - Comparison of Data Submission Costs

To evaluate operational impact of new collections:

- The Colorado Legislature will need to carefully consider return on investment for proposed legislation and include district data burden and related costs in that calculation.
- The State Board will also need to consider burdens imposed by new data submissions during rulemaking.

Support Data Burden Relief for Districts

Since 1998 the effort (cost) to submit only the major collections has steadily increased, and has grown by 53% over that 20-year period (see **Figure 2 - History of Major Collections and Costs**). Strategies to relieve data burden would include a regular review of reporting requirements with a focus of collections rated as low benefit, and a temporary moratorium on additional collections.

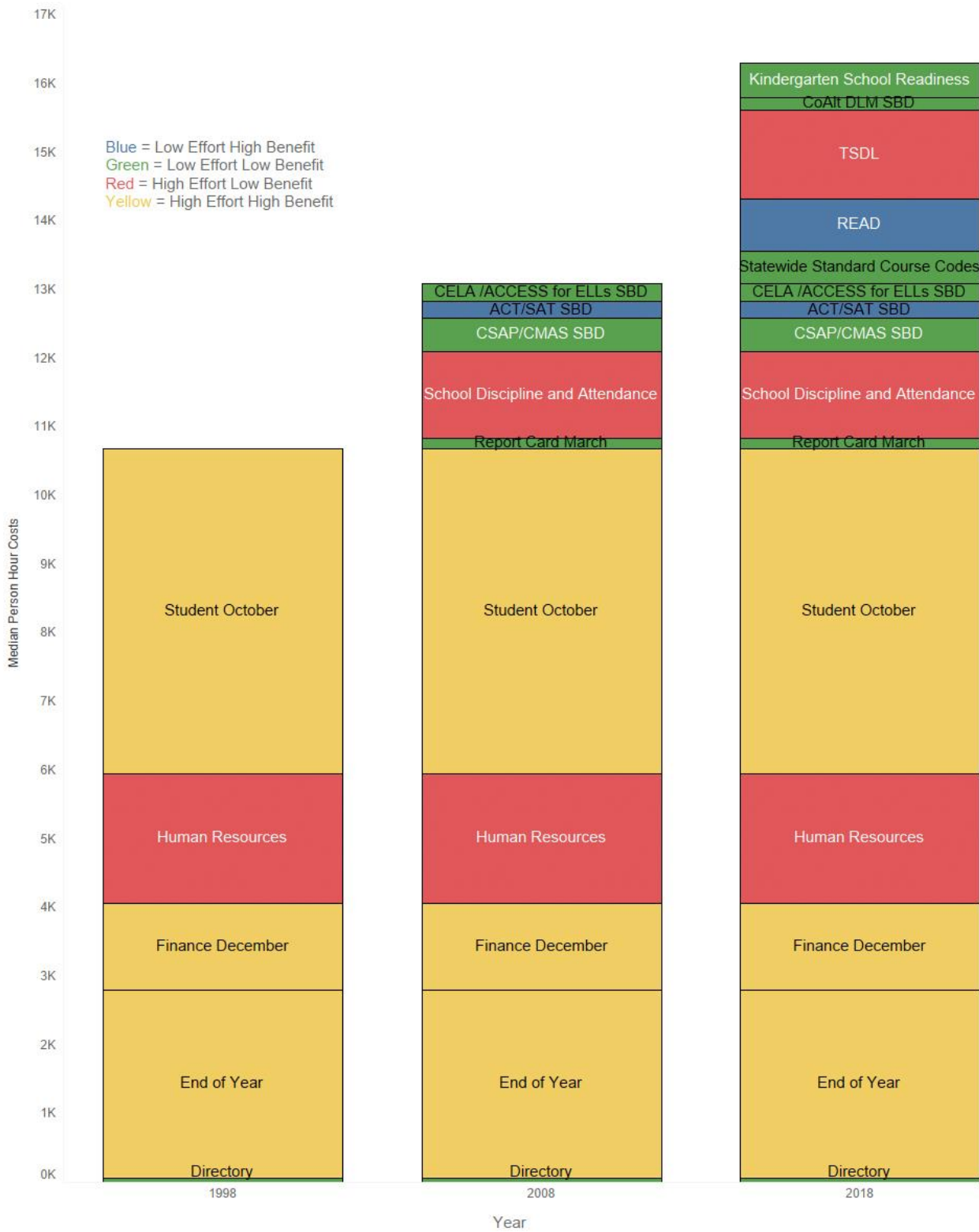


Figure 2 - History of Major Collections and Costs

To support data burden relief for districts:

- **The Colorado Legislature should review each state-required report and submission for possible sunset, evaluate low benefit collections, implement a moratorium on data collections as appropriate, and evaluate the operational impact for proposed new collections.**
- **The State Board should support data burden relief whenever possible for all districts, especially those in rural areas, by regularly reevaluating the need for and value of data collections.**

Key Observations

1. **A larger proportion of rural districts’ overall budgets are utilized for reporting than non-rural districts.** For every \$1,000 in earned revenue, rural districts devote \$5.67 towards data submissions where non-rural districts spend \$2.85 (see **Figure 1**).
2. **Major ongoing regular education LEA data collections have increased 200% from five to 15 from 1998 to 2018** and the associated median person hour costs for these have increased 53% from 1998 to 2018 rising from \$10,687 in 1998 to \$13,088 in 2008 to \$16,308 in 2018 (see **Figure 2**).
3. **Survey results support prior EDAC recommendations.** Report Card March (RCM), Kindergarten School Readiness (KSR), and Teacher Student Data Link (TSDL) were rated as low benefit collections by LEAs. These findings confirmed previous recommendations to eliminate these collections in an effort to reduce data burden.
4. **The Colorado Unified Improvement Plan (UIP) for Districts fell in the high effort, low benefit quadrant.** As discussed in the detailed recommendation, many found this collection to bring little value to the LEA due to timing or the fact the LEA had other processes for goal setting and progress monitoring. EDAC members recommended reducing data burden by only requiring this process for districts and schools on priority improvement and turnaround.
5. **Collections that generate monies for the LEAs generally fell into the high benefit quadrants** (i.e., Student October Count Collection and Colorado Reading to Ensure Academic Development (READ) Act Collection). Student October is the clear outlier overall, and for rural and non-rural districts alike, that is high effort and high benefit. Relatively new collections that brought in funding were rated lower in benefit and had lower completion costs. EDAC believes that these ratings are due to less familiarity with the new format for obtaining funding. This is true for the ESSA Application for School Improvement (EASI) used to obtain federal and state program monies, recently renamed Empowering Action for School Improvement.

This Student October comment displays both the positive and a frustration, “Beneficial due to funding. When data pipeline was introduced we were all told that it was to minimize reporting and make it easier with fewer reports. We now have more reports than in the past and most with repetitive information.”
6. **All Student Biographical Data collections were in the low effort quadrants, but fell across the midpoint for benefit.** Each had a benefit score of 3.0 but ended up on both sides of the benefit line due to rounding.

One LEA suggested regarding the assessment SBDs, “This report would be much easier if information was pulled from the Student Interchange files much closer to the test dates. Our District experiences a lot of new enrollees and withdraws from October 1 data to actual testing.” Another offered for the CMAS / CoAlt Science and Social Studies SBD, “This is beneficial for individual students who need accommodations however it is very time consuming and the fact that it does not transfer from one assessment to another leads to a lot of duplicate efforts.”

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7. **Assessment's two Student Registration / Personal Needs Profile Field Definitions Administration collections fell in opposite quadrants.** The CoAlt Science and Social Studies was viewed as low effort, low benefit to LEAs, and the CMAS was determined to be high effort, high benefit. Both collections fell very close to the graph center. Each had an average benefit of 3.0, but the average costs fell on both sides of the \$789 mid-point.
 8. **All transportation forms were considered high benefit except for the School Transportation Assistance Review (STAR) Questionnaire.** One LEA commented, "Compliance is important and safety is a must, however, some of the state legislation involving rural school transportation issues is unnecessary and burdensome."
 9. **Food Safety Inspection Reports fell in the low effort, low benefit quadrant.** EDAC members considered reasons for this rating and rationalized it by explaining that LEAs will take the necessary steps for ensuring food safety without the inspections.
 10. **The Safe School Act Accreditation Report fell in the low effort, low benefit quadrant.** EDAC deliberated why LEAs would not consider this high benefit.

Background

Recognizing the significance of data to public transparency, as well as the risks to burdening LEAs with additional collections, the 2015-16 annual report of the Education Data Advisory Committee (EDAC) made a legislative recommendation to carefully weigh the benefit and value of data reporting requirements to local education agencies (LEAs). A collection in which LEAs spend an inordinate amount of time and receive little to no useful information in return is strongly discouraged. There is also a fine balance between data quality and its use. If providers don't understand how data is utilized and reported, any resulting information may be inaccurate or skewed.

Increasing data collection efforts are pulling precious resources away from classroom instruction as monies spent on collection and reporting detract from what can be spent to serve students (see **Figure 2**). Additionally, local resources are tighter than ever due to the continuing budgetary stabilization factor. EDAC recognizes the millions of dollars that have in recent years been contributed to assist in balancing this long ongoing education deficit, however there remains a cost to every call for additional data.

EDAC members have long noted the importance of reducing collections where the burden outweighed the value. In our 2016-17 annual report, EDAC recommended to eliminate collections with no relevance, providing both Report Card March and Teacher Student Data Link as often stated examples. Last school year our committee deliberated about how best to ensure EDAC recommendations were heard and acted on. Empirical evidence was the consensus, thus the EDAC data burden survey was born.

Recently the Colorado General Assembly has proposed several, and successfully passed, a few bills to reduce data burden.

In the 2015 legislative session there were two such bills that did not pass.

- HB 15-1155 Flexibility for Rural Districts was proposed to allow small rural districts to submit certain reports biennially instead of annually.

Data collection is a burden on all districts, it just looks different depending on the size of the district. Campo is a very small district where three people in our central office, the Superintendent/Special Education Director, Business Manager/Librarian, and School Secretary/Bus Driver, are responsible for all CDE collections. The school secretary completes most of the collections while continuing to do all of her many daily duties. Most of the collections require her to enter the data manually since the district does not have systems to manipulate data for submissions.

Over the years, more and more collections have been added to her responsibilities, creating a challenge for her to complete the workload. She usually has several collections that are open at any given time and every minute she is not answering the phone or helping parents, students or staff, she is working on a collection.

There is no doubt that there is enough work for another staff position, but if a position is added, even more money will be taken from student programs and opportunities. Because of the low "n" size of our classes, very little data is ever made available to the district resulting in most collections having little or no benefit to the district. Every collection, regardless of size, takes time and precious resources away from students. There should be careful consideration to weigh any benefit with the cost to the district for every collection.

-- Nikki Johnson, Superintendent, Campo School District RE-6

- HB 15-1322 Study of Local Education Provider Data Reporting Requirements would have prompted a review of all statutory and regulatory data reporting requirements to determine whether or not there were items that should be repealed due to provision of unnecessary data or creating an undue district burden.

Within the past few years at least three bills were passed that addressed data burden.

- HB 14-1204 Rural Flex Bill allowed biennial (every other year) submission of the Unified Improvement Plan (UIP) for small, rural schools with a Performance plan type assignment and districts that are Accredited or Accredited with Distinction.
- HB 16-1440 Flexibility in UIP Submission expanded this same flexibility to all schools and districts.
- HB 15-1321 Flexibility and Funding for Rural School Districts allows small rural districts to report expenditures only at the district level.

The Colorado Charter School Institute (CSI) is a statewide charter school authorizer overseeing 39 schools. Schools are located in rural, urban, and suburban settings from Fruita in the West to Calhan in the East, Durango in the South to Steamboat Springs to the North. CSI has a diverse portfolio of schools that vary in educational models offered—including Classical, Early College, Waldorf, Alternative Education, Montessori—and that vary in size—from a school of less than 30 students to a school of 2,000 students.

While there were some steps made to reduce the burden, there were also additional collections added. Based on changes made in the 2018 legislative session alone, CDE will now be requesting additional data from LEAs for military enlistment after college, International Baccalaureate data for accountability purposes, and graduation guidelines data to ensure postsecondary and workforce readiness. Additionally, School Discipline and Attendance information may be collected differently as a result of recent media inquiries.

As autonomous schools, each selects, purchases, and maintains its student information system, which is used to fulfill state and federal data reporting requirements, among other things. While most costs related to the SIS are on a per student basis, some costs—like those related to implementation and training—are fixed, making it more difficult for smaller schools to afford. Additionally, there are standard set up, maintenance, and roll over tasks that must be completed throughout the year regardless of a school’s size. For smaller schools that have few staff, these standard activities take up a greater percentage of staff time.

In addition to the challenges smaller schools have with student information systems are the challenges they have around data reporting. The number of data reporting requirements and activities do not vary based on school size, so our school of 30 students is completing the same number of collections as our school of 2,000 students with fewer staff and very often with less infrastructure.

In these ways, CSI seems to be a microcosm of the state: each of our schools have similar experiences with the districts in the state, with our smaller schools feeling similar burdens to the small and rural districts and our larger schools experiencing some of the benefits of economies of scale. What all of our schools share—just like all school districts—is burden of the existing and ever increasing data reporting requirements on them.

--Janet Dinnen, Chief of Staff, Charter School Institute

To be clear, EDAC is not in blanket opposition to the increase of data collections as it recognizes the importance of several existing and

newly added collections. Rather, it is opposed to the increase of data collections in which the burden of completing the collection outweighs the value obtained from them.

CDE has decreased burden by focusing on the data elements within certain collections and has eliminated one field at a time within numerous collections, but these improvements have had no measurable impact. CDE continues to identify ways to streamline the collection process--CDE prepopulated about 60-75% of the federal 2015-16 Civil Rights Data Collection (CRDC) for LEAs and will increase these percentages for the 2017-18 collection.

Although educators recognize the power of data to support student learning and success and how it serves as a valuable resource to a variety of public consumers, the call to reduce data burden has been getting louder over the past few years. Organizations, such as the Colorado Rural Schools Alliance and the Colorado Association of School Executives, have been increasing advocacy around this issue for the LEAs they represent. The efforts that have been done are not enough. EDAC heard the concerns. LEAs do not have the resources to complete the numerous data collections, especially when there is no perceived value or relevance. Growing frustrations are mounting about the volume of work needed to complete the existing 65 mandatory, 70 required to obtain benefit and 39 voluntary collections.

EDAC took action! In the 2017-18 school year EDAC assessed burden and relevance of 'mandatory' and other time-intensive collections. Our end goal is to provide recommendations from the LEA perspective on collections where the time and effort to collect the data outweighs the value. It is our hope that these recommendations can help decision makers prioritize their review of existing collections and take action on collections that can be adjusted or eliminated over time. A one-time voluntary survey was designed to quantify the time selected collections take, determine the value/relevance of each and assess usefulness to inform educational policy or research. All local education agencies were encouraged to respond so that EDAC could justify the recommendations made within this report.

EDAC hopes that this study will shine a light on burdensome collections to the General Assembly, the State Board of Education and the Colorado Department of Education and that collaborative efforts will ensue to reduce LEA data burden in the coming years. To address the various recommendations at one time would be overwhelming to all involved. A coordinated data reduction plan would focus efforts and keep the momentum moving forward.

Methodology

In the 2016-17 school year EDAC committed to quantify data collection time and effort in conjunction with value and usefulness to local education agencies.

EDAC was inspired by the work of the Colorado Rural Schools Alliance, Rural Education Council and the Mancos waiver request from data collection with the end goal of easing data burden. EDAC also did not want to jump to conclusions, but rather wanted the data to speak for itself. Admittedly, committee members had suspicions and these were validated through the results.

EDAC was intentional in setting the scope of the project to reflect the perspective of LEAs. While EDAC recognizes that there are several other users of the data within the state and nationally, it was important to quantify the time and effort and perceived value by the entities primarily responsible for collecting the data—the LEAs. That said, EDAC recognizes that the LEA viewpoint is not the only one to consider when adjusting or eliminating reporting requirements. Therefore, some recommendations found within this report do offer additional stakeholder perspectives to consider.

Survey Development

Local education agencies were tasked with completing a total of 173 collections in 2017-18. 28% of the data collections EDAC reviewed in 2017-18 are federally required, 52% are required by the state, 15% are required by both federal and state governments and 5% reference no legislation.

Given the abundance of data collection requirements in Colorado, EDAC developed the questionnaire June through November of 2017. EDAC representatives brainstormed what to ask to answer the following primary questions:

1. What level of effort do LEAs exert on each data collection (in terms of the number of staff involved and number of staff hours committed)?
2. How beneficial do LEAs see each data collection?

EDAC identified 84 mandatory and other collections to include in the questionnaire. The survey items included applicability, total person hours spent working on the collection, benefit to the LEA, usefulness to inform or influence education policy and/or research and suggestions/recommendations/comments/notes. Benefit and usefulness were measured on a 5-point Likert scale, 1 being not beneficial and not useful and 5 being extremely beneficial and extremely useful. The survey was balanced between the subjective responses of collection value and the objective data of submission time and effort.

The committee created clarification and guidance to accompany the questionnaire. The questionnaire was built in an Excel file and shared with all local education agency Data Pipeline liaisons between November 8, 2017 and February 9, 2018.

It should be noted the responses for each of these measures reflect the subjective perspective of the completers and that completers may have recorded their responses differently depending on their role, familiarity with the collection, and/or how they may use the resulting data.

LEAs also had the opportunity to add any perceived burdensome submission or collection that was not on the original list. While no LEA-added collection met the minimum 25 response threshold to be included, December Count- Student, the EDAC Data Burden Survey, Student Interchange files and Special Education high cost reports were most often referenced as taking a significant amount of time or resources to complete.

EDAC understands that the Colorado General Assembly or the State Board can't impact some of these collections, for example the U.S. Department of Education's Office of Civil Rights is responsible for the biennial Civil Rights Data Collection (CRDC). CRDC is still seen as a data burden even since the 2013-14 collection when CDE began a service of pre-population for data that had already been reported to the Department.

Survey Respondents

All local education agencies were surveyed. This included districts, boards of cooperative educational services (BOCES), administrative units (AUs) and migrant regions. EDAC did not survey groups outside of LEAs like researchers, advocacy groups and other public consumers of education data.

EDAC estimated that it would take 2 to 20 hours depending on the size and complexity of a LEA to accurately and thoroughly complete this survey. EDAC understood that communication to various stakeholder groups was critical to obtain a decent return rate with an instrument that was fairly time consuming to fill out. Therefore the survey was communicated widely to groups such as the Association of Colorado Education Evaluators, BOCES Association, Colorado Association of Leaders in Education Technology, Colorado Association of School Boards, Colorado Association of School Executives, Colorado Association of School Personnel Administrators, Colorado Charter School Institute schools, Colorado Department of Education Schools of Choice Unit, Colorado League of Charter Schools, Colorado Public Radio, Colorado Rural Schools Alliance, Colorado Student Information Systems Users Group, Data Pipeline Users Group, Rural Education Council, and through weekly town halls. Additionally, CDE's field service managers helped spread the word through the Superintendent Advisory Councils and the Professional Superintendent Association meetings.

This voluntary EDAC Data Burden Survey had 137 total respondents resulting in a 51.1% response rate. This respectable return demonstrates the importance of this topic to the education field. EDAC members recognize that LEA respondents invested an incredible amount of time and effort on this collection in hopes of reducing the impact of data burden.

LEA respondents varied in their role, from district-level data respondent to superintendent. However, it was encouraged that LEAs work internally to ensure the survey responses were representative of the LEA as a whole.

More than a third of districts, BOCES, Administrative Units, migrant regions and the Charter School Institute responded. All eight educational regions of the state were represented in the results as well. North Central LEAs had the largest response rate at 78 percent. Representatives of small rural, rural and non-rural local education agencies returned surveys. However, a much larger percentage (73%) of non-rural LEAs completed the survey (see **Figure 3 - Response Rates by Region and Rural Status**).

Response Rate	Region
78%	North Central
61%	Metro Area
55%	Pikes Peak Region
45%	Northeast Region
40%	West Central Region
40%	Southeast Region
35%	Northwest Region
51%	Statewide

Response Rate	Rural Status
73%	Non-Rural
57%	Rural
35%	Small Rural

Figure 3 - Response Rates by Region and Rural Status

Data Interpretation

Only those collections with a minimum of 25 respondents were included in the EDAC Data Burden Survey results. EDAC utilized median for the hourly costs so that outliers would not skew results. To calculate the monetary impact of a collection per LEA, EDAC utilized \$32 per hour for rural and \$33 for non-rural local education agencies as reported in the 2017-18 Human Resources data collection.

EDAC added existing CDE data to enrich analyses such as 2017 administrator/student and teacher/student ratios, BOCES affiliation, 2017 district accountability ratings, 2017 free and reduced lunch percentages, 2016 revenues, rural status, setting, 2017 student count, and region.

Members agreed to use the quadrant, a common tool to visualize data. More detailed information about how to read the results quadrant can be found in the “Utilizing the Data Quadrant” section below. EDAC selected the 65th percentile of the median person hour costs as is utilized within CDE growth calculations.

EDAC members conducted a thorough data analysis of the responses. Districts and administrative units were compared, as were LEAs with rural versus non-rural status. Rural and small rural districts were combined into a general rural category.

During this analysis, EDAC members noticed that districts rated most collections as beneficial if they had direct financial benefits to the LEA. Long term usefulness, on the other hand, was not always reflected in the same way in the survey.

The average data respondent to this survey was the person who does daily district data submissions, and the person in that role is more in tune with high operational impacts versus potential long term policy or program benefits. These “front line” data representatives may not be in the best position to evaluate long term policy or program benefits of data

collections. For this reason, EDAC committee members agreed that perhaps data respondents were not the appropriate audience for the usefulness question. Due to our lack of confidence in the usefulness data, it was not included within our results.

One local education agency remarked about the EDAC data burden survey, “This survey has been somewhat interesting to the district, but the big question is: ‘What will you do with it?’”. Another district expressed their optimism for EDAC’s endeavor to reduce data burden by stating, “We have high hopes.”

Members sliced and diced the data many ways to ensure that the most relevant points were brought to the forefront. EDAC reviewed all quadrants, confirmed that for the most part, the high benefit collections were those that contributed to funding distribution. Some of those were low effort, some were high. The High Effort Low Benefit collections as rated by LEA respondents became the primary focus for the purpose of identifying areas of improvement. EDAC Data Burden Survey results may be [viewed here](#). The identities of LEAs have been masked.

Members also reviewed the comments made for each collection. Select comments are scattered throughout this document as appropriate.

Utilizing the Data Quadrant

The quadrant below categorizes each collection based on the median person hour costs and whether, on average, LEA respondents felt the collection was beneficial. Each dot on the visualization below represents a collection (see **Figure 4 - Median Person Hour Costs (Effort) and Perceived Benefit of Collections**).

The x axis, at the bottom, represents how beneficial respondents reported a collection to be. Responses ranged from ‘Not Beneficial’ (1) to ‘Extremely Beneficial’ (5). A collection is considered beneficial if the mean average is 3.0 or higher. On the beneficial scale 3.0 is the mid-point. These collections fall on the right side of the vertical line.

The y axis, at the left, represents how much effort a collection takes. Any collection costing over \$789 is high effort within this study. High effort collections fall above the horizontal line and are indicated in red and yellow. Low effort collections fall below the line and are indicated in green and blue.

In reviewing the quadrant, remember that a collection is included only if 25 or more LEAs responded. There are four quadrants: High Effort, Low Benefit at the top left; High Effort, High Benefit at the top right; Low Effort, Low Benefit on the bottom left; and Low Effort, High Benefit on the bottom right. **Figure 5 - Alphabetized Collections with 25 or More Responses Falling in Each Quadrant** lists each collection by name within its resulting quadrant. However, the distance from survey midpoints cannot be determined within such a list.

- A High Effort Low Benefit collection is one that takes on average more than \$789 to complete and was rated below 3.0 on the beneficial scale. The 2015-16 Civil Rights Data Collection was the furthest away from the center in this quadrant. One district offered, “From a district perspective completely useless burden” and another said, “We believe this data gets used in some capacity at the Federal level but we do not see how this data benefits our district especially if we are already collecting the same data for different submissions.”
- To the right, a High Effort High Benefit collection falls at the same higher monetary threshold but was rated above 3.0 for benefit. Student October Count collection was the clear outlier within this area. One local education agency commented, “This report impacts several areas in the district and requires time from many folks to gather data as well as cleanup and update data as required by the state because this is the "bread and butter" for funding districts.” Another suggested, “The main reason we find this data useful is funding. We also know the information gathered is beneficial for demographic and socio-economic data collections.”
- At the bottom of the quadrant fall the collections that cost \$789 or less to complete. On the lower left are collections that are not considered beneficial as they received a benefit rating less than 3.0. The furthest from center was the Assurances: Great Teachers and Leaders Act Collection. One respondent questioned this collection by asking, “Remove. In what other instances do we have to submit assurances that we follow Federal or State Law?”
- On the lower right are those collections with small costs but are rated beneficial with a rating at 3.0 or above. The furthest from the middle was the Certification of Mill Levies Collection. One local education agency explained, “Information gathered may be useful to identify discrepancies in school funding and local support. Also could be useful to track the relationship in economic status and academic success.”

Data Burden Survey Findings

EDAC Data Burden Survey results may be [viewed here](#). For those wishing to delve deeper into the data, hovering over the dots within the live link will list the collection along with whether it is a requirement of the state, federal or both, the mean person hour costs to complete, and the benefit rating.

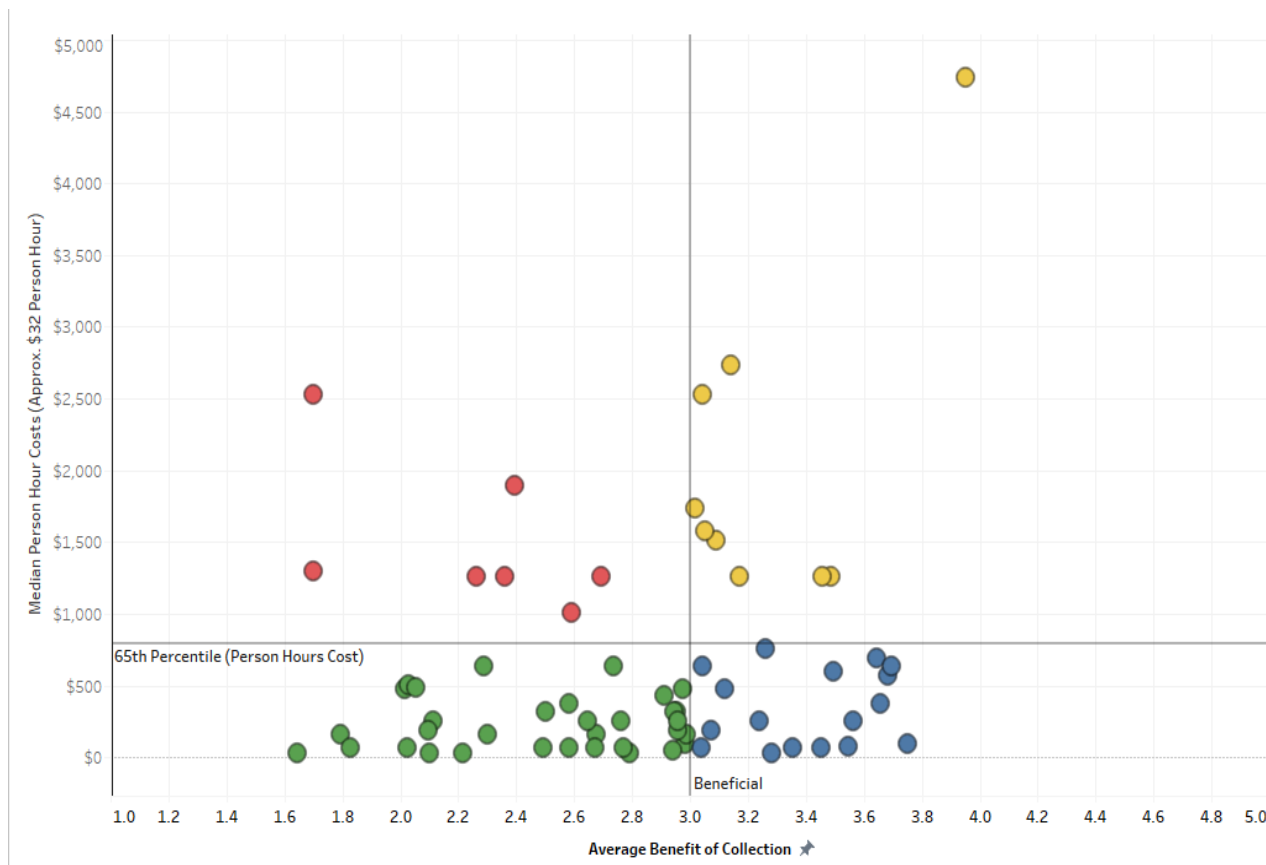


Figure 4 - Median Person Hour Costs (Effort) and Perceived Benefit of Collections

<p><u>High Effort Low Benefit RED</u> 2015-16 Civil Rights Data Collection (CRDC) Colorado Continuous Improvement Process Indicator 14 Post-School Outcome Data Colorado Unified Improvement Plan (UIP) for Districts Human Resources (HR) School Discipline and Attendance (SDA) Special Education Discipline (AU response only) Teacher Student Data Link (TSDL)</p>	<p><u>High Effort High Benefit YELLOW</u> December Count-Staff (AU response only) Finance December Independent Review of Applications NCLB Consolidated Application Budget Special Education End of Year Standard Record Review Student End of Year (EOY) Student October Audit Student October Count Collection</p>
<p><u>Low Effort Low Benefit GREEN</u> ACCESS for ELLs SBD (Student Biographical Data)</p>	<p><u>Low Effort High Benefit BLUE</u> Application for CDE Annual Inspector Qualification or Recertification</p>

<p>Accreditation Report (Fiscal Accreditation Compliance for Budgeting, Accounting and Reporting)</p> <p>Assurances: Implementation of Great Teachers and Leaders Act</p> <p>CMAS / CoAlt Science and Social Studies SBD (Student Biographical Data)</p> <p>Colorado Continuous Improvement Process IDEA Part B, IDEA Preschool, & ECEA Fiscal Responsibilities</p> <p>Community Eligibility Provision Notification Form Directory</p> <p>Dynamic Learning Maps SBD (Student Biographical Data)</p> <p>Educator Identifier System (EDIS)</p> <p>Epinephrine/Anaphylaxis Reports: Report of Epinephrine Administration</p> <p>ESSA Application for School Improvement (EASI)</p> <p>Expelled and At-Risk Student Services (EARSS) State Reporting (mid-year & end-year reports & matrix)</p> <p>Federal Application Project Narrative</p> <p>Food Safety Inspection Reports</p> <p>Gifted and Talented Student Education Plan</p> <p>Kindergarten School Readiness (KSR)</p> <p>McKinney-Vento Homeless Education Title X Part C</p> <p>NCLB Set Aside Activity Report (collected annually prior year)</p> <p>Non Public School Information</p> <p>Nutrition Verification Collection Report</p> <p>Online Comparability Data Collection</p> <p>Online Consolidated State Performance Report Data Collection</p> <p>Report Card March (RCM)</p> <p>Report of November Elections</p> <p>Resolution Meeting Verification Form For Due Process Complaints under IDEA</p> <p>Safe Schools Act Accreditation Report</p> <p>School Transportation Assistance Review (STAR) Questionnaire</p> <p>Special Education Discipline (District response only, Not AU)</p> <p>Special Education End-of-Year Revenue and Expenditure Report</p> <p>Statewide Standard Course Codes (SSCC)</p> <p>Student Registration / Personal Needs Profile Field Definitions Administration - CoAlt Science and Social Studies</p> <p>Teaching and Learning Conditions (TLC) in Colorado Survey</p>	<p>Application for Inspecting Site Certification</p> <p>Application for Qualification or Recertification of CDE Annual Inspector Hands-On Tester</p> <p>Brake Inspector Qualification Certificate</p> <p>CDE Affidavit of Annual Inspection for School Transportation Vehicles</p> <p>CDE Annual Inspection/Preventive Maintenance Checklist</p> <p>Certification of Mill Levies Collection</p> <p>Colorado Preschool Program Annual Report and Intent to Continue</p> <p>Colorado READ Act Collection</p> <p>Medical Information - Activity Trip/Small Vehicle Operators</p> <p>PSAT10/SAT SBD (Student Biographical Data)</p> <p>Public School Transportation Fund Reimbursement Claim</p> <p>Record Integration Tracking System (RITS)</p> <p>Request for New School Code, Closure, Name Change and Grade Change Forms</p> <p>School Transportation Vehicle (School Bus) Pre-Trip and Post Trip Requirements</p> <p>School Transportation Vehicle (Small Vehicle) Pre-Trip and Post Trip Requirements</p> <p>Student Registration / Personal Needs Profile Field Definitions Administration – CMAS</p> <p><i>Note: These collections are listed in alphabetical order. Some collections like SBDs were rated on average benefit at 3.0. Although all SBDs were low effort, three fell under low benefit and another under high benefit due to rounding.</i></p>
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Figure 5 - Alphabetized Collections with 25 or More Responses Falling in Each Quadrant

House Education

02/26/2025 Upon Adjournment

HB25-1210 Data Reporting Requirements for K-12 Schools

Typed Text of Testimony Submitted

Name, Position, Representing	Typed Text of Testimony
Matt Scoggins For Rangely School District	<p>I appreciate the opportunity to support HB 1210 and the effort to reduce the reporting burden on districts.</p> <p>I strongly believe the state needs to recognize that every additional data submission takes valuable resources—both financial and staff time—away from directly supporting students. We are a local control state, yet these reporting requirements continue to increase, creating a significant administrative burden on rural districts like ours. There has to be a better way to ensure accountability without overburdening schools.</p>