

Date: June 9, 2022

Prepared By: Helen Gaussoin

Witness: Helen Gaussoin, Principal Analyst, LESC; Cindy Sims, Superintendent, Estancia Municipal Schools

Reporting Requirements: Streamlining Initiatives.

Discussions on reducing the burden of public school reporting often center on reducing the number of required reports, but concerns raised by those doing the reporting are equally focused on the process by which the data is collected—the duplication of data entry, frequency of reporting, size and complexity of the forms, technological infrastructure, and communication about and timing of responsibilities. All reporting requirements—even those critical to understanding and supporting student success and protecting the state’s financial investment—take educators and other resources away from the classroom, but excessive and badly executed regulation demoralizes staff and wastes taxpayer money. While lawmakers should be cognizant of the potential harm of enacting overzealous reporting requirements, creating a more efficient and meaningful process could be a more successful approach to streamlining reporting.

Thousands of Hours

In an informal survey of school districts and state-authorized charter schools conducted by LESC staff in May, the 32 school leaders from 30 districts and schools who responded reported their central offices spend an average of more than 600 hours a year on reporting. School sites that do separate reporting generally spend a couple of hours a day on reporting.

“Approximately 30 percent of our work time is focused on reporting from finance, federal programs, licensure, health, food services, transportation, SPED, assessment, safety, STARS, etc. We always have administration working on something for PED.”

Survey Respondent

average, if accurate, is much lower than the 15 thousand personnel hours per school identified by the 2016 report [Efficiency Evaluation: A Review of Public Education Reporting](#), a study by the education-focused Martin Consulting Group. However, the author of the 2016 evaluation reported

Notably, respondents skewed toward small districts, which possibly have a lower reporting workload but report they are hit harder by reporting requirements because they must produce the same reports as large districts but with limited administrative staff. The 620-hour

Key Takeaways

New Mexico public school staff spend tens of thousands of hours a year on reporting requirements at a substantial cost to students and state taxpayers.

Page 1

Reporting requirements often involve the duplicate entry of data in multiple systems.

Page 2

A lack of coordination among department programs leads to conflicting deadlines and short turnaround times.

Page 5

Efforts to reduce the administrative burden of statutorily required reporting do not always turn out as expected.

Page 6

The department is making progress.

Page 6

she based her number on Albuquerque Public Schools, the state’s largest district, and the estimate could be high. The superintendent of the largest school district in the May survey, about a quarter the size of the Albuquerque district with more than 23 thousand students, reported staff spends more than 900 hours a year on reporting and one district detailed spending 6,185 hours on reporting, suggesting the 600 hours a year average in the survey could be more accurate.

Costs

In discussions about capping school district administrative costs, opponents to the cap noted a big driver of administrative costs is complying with regulation, with one former superintendent telling a news reporter he once cut administrative spending by 12 percent only to have to raise it by 8 percent later to cover an increase in mandated reporting. The 2016 report estimated the average New Mexico school district spends \$357 thousand a year on reporting requirements, and even at its lower estimate of 15 thousand reporting hours a year statewide, found New Mexico educators were spending 66 percent more time on reporting than some peers primarily because of outdated and poorly coordinated data collection and validation.

Disproportionate Impact on Small School Districts and Charter Schools

The burden of reporting requirements falls more heavily on small school districts with little administrative capacity. The 2016 report concluded the scope of reporting is not extraordinary in New Mexico compared with other states, but 36 of the state’s 89 school districts have fewer than 500 students, with a superintendent often filling multiple administrative roles, including that of reporting. All but eight of the state’s 53 state-authorized charter schools, considered local education agencies with reporting requirements similar to those of school districts, have fewer than 500 students. Charter school advocates note they are unable to generate additional funding to address the diseconomies of scale.

“Sometimes the team consists of me, myself, and I.”

Small District Survey Respondent

Volume of Reports

Determining how many reports are due is complicated. While the 2016 report included a “calendar” of reports with 140 requirements, repeated efforts to obtain a current version of the list were unsuccessful and survey responses indicate the calendar no longer exists. A district-provided list contained 13 reports, although some of the items represented multiple reports. Reporting requirements are in statute, administrative code, administrative processes and guidance from the Public Education Department (PED), Public Education Commission, other state agencies, and federal regulators. Both the pandemic and the federal stimulus funds associated with it have increased public school reporting requirements.

“In a ‘normal’ year, we spend just over 600 hours of time on various business, data, counts, Ed plan, Dash, 90 day plans, ... Federal, etc., reporting pieces. During Covid (FY20-22), we have more than doubled that.”

Survey Respondent

In addition, the pandemic’s impact on staffing has left many schools short-staffed, and several school administrators reported in the survey and in interviews they try to limit the reporting burden, and associated training burden, on

school sites because they simply need principals on campuses, available to step into the classroom as needed in addition to managing their regular duties.

“Burdensome Reports”

In testimony before LESC in 2021, current and former school administrators identified three kinds of burdensome reports: redundant reports, which require school districts and charter school to provide information already submitted; reports where data is not utilized; and reports that require many staff hours to complete but provide limited value to decision makers.

Data System Duplication and Validation

All but four of the 32 survey respondents said staff must submit duplicate data for different reports, and half of those said they must do it frequently. District and charter school officials report having to pull data they have submitted to STARS (the Student and Teacher Accountability Reporting System) and enter it into other portals and complain about multiple portals on multiple platforms and multiple sign-in credentials. The department provided a list of 27 online applications districts and charter schools use for data entry. Data validation—the state-level process of looking for errors in data entry—can take up to a month.

“The redundancy of information is ridiculous. PED has most of everything they ask for already. ... If not, get a better student information system!”

Survey Respondent

Duplicate Data Entry

Survey respondents listed dozens of reports that involve duplicate data entry, with, for example, data entered for STARS then entered again for special education and data for the multilayered systems of support (MLSS) process entered a second time for *Martinez-Yazzie* lawsuit compliance. Numerous respondents noted the issues stems in part from different PED programs asking for the same information. A charter school advocate noted, while duplicating the data entry might take only five or 10 minutes per report, the minutes add up when repeated over multiple reports and is particularly frustrating when the department could pull the information from its own data systems.

“By PED's own admission, all of the [federal stimulus] information could have been pulled from OBMS [the financial reporting system] and applications at the state level; however, they required us to pull the information and submit in their spreadsheet. Many of us do not understand why PED cannot pull information at their level from STARS and OBMS. We spend a significant amount of time making sure data submitted in those two portals are correct and accurate only to be asked to pull our data and submit to PED in their special format.”

Survey Respondent

Notably, grant applications are among the reports that often require duplicate data entry; however, some states, including Colorado, have a “common” application that allows applicants to apply once for multiple programs.

System-to-System Compatibility and Data Validation

While survey respondents and administrators who were interviewed cited concerns with the complexity and length of certain reports, many noted, instead or in addition, many issues with data entry are related to the failure of PED systems to talk to each other or with local

student information systems, like Powerschool. The department is working on a “real-time data” system, now called Nova, that would validate data as it is entered to eliminate the later, manual validation process that can take 30 days or more and involves extensive back-and-forth communication between the local education agency and the department. Ten districts are participating in the Nova pilot, and the department projects the system will go live statewide for the 2023-2024 school year.

Department Applications for Data Entry

- Carl D. Perkins Career and Technical Education Act of 2006 – Application for Redistribution of Funds
- Dropout Data Collection System (DDCS)
- Early Childhood Observation Tool (ECOT)
- Production/Training
- Educator Effectiveness System
- Graduation Cohort
- Membership Projections
- New Mexico DASH
- Operating Budget Management System (OMBS),
- Secure Online Assessment Portal (SOAP)
- Special Education Monitoring
- Student Nutrition Portal – Application
- Student Nutrition Portal – Claim Entry
- Student Teacher Accountability Reporting System (STARS)
- MAPS
- Teacher Interactive Dashboard
- Title I Application (ESEA)
- Training and Experience
- Title I Part D End of Year Reporting
- Migrant Application
- Document Transfer Station
- Cognia
- WIDA
- DLM/Kansas U
- Istation
- College Board
- Annual School Health Data Collection

Source: PED

resolved, and department leadership has committed to substantially streamlining the data collection process. The 2016 report noted a governance council would provide local education agencies with a formal process for providing the department with feedback on policies and procedures.

System Building

While comparisons are difficult without deeper knowledge of the structure of education departments in other states, the staffing of information technology services in New Mexico's Public Education Department might fall short of those in nearby states and states with public school enrollment similar to New Mexico's 319 thousand students.

Complicating efforts to ensure clean data makes it from the district or charter school to the department is the use of several different local student information systems; however, mandating a single platform, through statute or policy, likely would meet resistance from districts and charter schools because of its potential impact on grading and curriculum practices. Nevertheless, a single system would not only simplify the transfer of data between local and state education agencies, it would reduce training and implementation costs.

The department reports, while no single platform is mandated, districts must choose a system compatible with student enrollment reporting (the 40th, 80th, and 120th day counts) and end-of-year STARS data collection.

Governance

Both the 2016 study and a separate, contemporaneous report by consultants hired by the department concluded the department needed a state-level data governance program to oversee data collection policies and processes and communicate clearly with districts and charter schools. That council is now being created and is working on a governance framework. Anecdotal information indicates the delay in its creation was the result of internal conflict between two department units, which led to two different data “worlds,” and a lack of commitment from department leadership. Both issues have since been

While New Mexico lists 18 staff members in its information technology office and is funded for total staffing of about 290, the Nebraska education department, serving a similarly sized student population, lists 32 IT staff and 480 total employees. Colorado has more than 60 employees listed in its Information Management Services offices and about 615 total employees but three times the student enrollment.

Expressed as a share of total employees, again with the caveat the data is imperfect, fewer than 1 in 16 PED employees works in IT, while nearby Colorado employs about 1 in 10 and similarly sized Nebraska, 1 in 15. Inadequate staffing would contribute to an inability to build the systems needed to create efficient and meaningful data collection.

Coordination and Communication

In addition to requests for duplicate data entry, school administrators report department divisions often request information or schedule training at the same time, overloading district and school site staff. Asked if department communication on reporting requirements is effective and timely, many survey respondents noted overlapping due dates, and at least six specifically called for the creation of a centralized, annual calendar. While some expressed support for the department's current method of communicating upcoming deadlines through emails, other complained of short turn-around times. On a scale of one to five, with one being the lowest rating, respondents gave the department a three on the effectiveness of its communications and a 2.7 on the timeliness of its communications.

In addition, respondents noted department staff turnover often results in inconsistent support, inconsistent instructions, and unnecessary changes.

Further, a consistent narrative among district leadership is that data often goes unused. True or not, the perception some data collection is pointless is widespread. The failure of the department to release an Educational Accountability Reporting System (EARS) report reinforces the perception, as does a website that is hard to navigate and contains outdated information and many "dead" links. Despite the importance of up-to-date information on educators and their qualifications to recruiting and retaining a high-quality workforce in a state with a teacher shortage, the last EARS report was issued in March 2020 and was based on data from the 2017-2018 school year. The department states a new EARS report is being created now, although it did not provide a timeline on when it would be available. The department also reported it is working on an online dashboard of information from its educator preparation program database, which includes data on graduates and education students. Again, a timeline was not provided.

"They send a lot of emails but sometimes too many. It would be easier to have one central calendar for the year and reporting dates. We often get the due dates without much warning and many of the due dates are at the same time."

Survey Respondent

"PED rule you can take to the bank: new person = significant, but unnecessary change to a reporting document, which requires extensive and completely unnecessary effort and time on our part! ... PED rule #2 you can take to the bank: the Friday afternoon before a long weekend/holiday, someone will send an email at 4:30 p.m. or later, which requires action sometime the following week!"

Survey Respondent

School district administrators said in interviews clear communication about how and where data will be used would help local school staff prioritize competing data demands; failure to communicate the purpose of collecting data leads to staff resentment.

Statutory Requirements

As [LESC staff reported](#) to committee members in June 2021, the Public School Code contains [121 reporting requirements](#) for schools, the department, the Public Schools Facilities Authority, the Educational Retirement Board, and other entities; however, eight authorize the department to require a report but do not actually mandate a report, another five require a report only if the recipient requests it, and 16 are situational, such as a requirement that schools report student injuries, and do not necessarily represent an administrative burden. In addition, 55 of the statutorily required reports designate the Legislature or a legislative agency as the recipient of a report but Legislative Council Service can access only 10 of those reports and LESC and Legislative Finance Committee can confirm just 10 more are available to legislative staff. This suggests 35 of those reports were either not produced or not distributed as intended and raises the possibility that eliminating these reports would not reduce the administrative burden of reporting.

Further, repeal of statutory requirements does not eliminate the burden because statute is only one way reporting requirements are created. The department has substantial control over how to interpret statutory requirements to “monitor” compliance and over what data to collect and how often it is collected. Following the 2016 report, the Legislature repealed five of six statutory requirements highlighted as in need of review by the authors of the report, but at least one of those requirements remains in place: While a state law requiring an annual student survey was repealed, an annual survey is still conducted under the state’s plan under the federal Every Student Succeeds Act.

Nevertheless, legislators must balance the need for information with the ability of the reporting entity to provide the information and be diligent to the burden created with every reporting requirement.

Department Efforts

Following several years of LESC efforts to identify unnecessary statutorily required reporting and examine the issue of burdensome reporting generally, the governor signed an executive order on May 23 directing the department to streamline data and program reporting in an effort to cut reporting requirements by 25 percent by the 2022-2023 school year. Responding to the governor’s announcement, department leadership echoed many of the same concerns raised by the local school officials through the survey and in interviews with LESC staff.

The effort will build on steps the department has already taken, including reducing the number of questions in the Education Plan report from 131 to 32 questions and creating an online application with pre-populated fields to meet required federal data collection. While several survey respondents noted the department improvements—specifically citing more active communication by department staff and a greater commitment to streamlining by department leadership—some of those interviewed by staff said, while the department cut questions in the Education Plan report, the complex nature of the remaining questions results in a report that takes just as long to complete. Others among those interviewed, including several who have been active on the issue of reporting

burdens, said any reductions in the reporting burden resulting from department efforts have been offset by additional reporting requirements on the federal level.

Considerations

In its continuing efforts to reduce the administrative burden of reporting requirements, the department should consider

1. Developing a coordinated approach to data collection that includes consideration of due dates;
2. Recreating the centralized annual calendar of report due dates;
3. Expanding the use of pre-populated forms;
4. Providing greater flexibility on due dates so agencies can prioritize their reporting efforts;
5. Extending time lines on reports that do not need to be prepared annually;
6. Making better use of STARS data by providing school administrators with access;
7. Telling local education agency leaders why the department needs the data and how it will be used.