

USBE Legislative Request Form

(Policy, Funding, & Efficiency / Reductions)

2027 General Session

SECTION 1: THE BOTTOM LINE

Request Title: Reporting Requirement Standards and 18-Month Timeline for New Education Data Collections

USBE Lead Point of Contact:

- Name: Trish Joshua
- Email: trish.joshua@schools.utah.gov
- USBE Section: Policy

Director Reviewer: Elisse Newey & Katy Challis

Nature of Request (Select all that apply):

☒ **Policy Change:** Creating, amending, or repealing Utah State Code.

☒ **New/Increased Funding:** Seeking new financial resources.

☐ **Efficiency / Reduction:** Proposing the elimination or reduction of a program, mandate, or funding stream. *(Complete Section 3 and/or 4)*

Purpose Statement (BLUF - Bottom Line Up Front):

We request statutory amendments to Utah Code establishing a standardized framework for public education data mandates. Operationalizing Recommendations #1, #3, and #5 of the State Board's *Reporting Requirements Study* (Utah Code § 53E-3-526), this request creates new statutory provisions to:

1. Establish a standard **18-month minimum implementation timeline** before new data collections are enforced.
2. Require **LEA administrative burden and software vendor costs to consistently be evaluated and included on legislative fiscal notes.**
3. Adopt a statutory **Reporting Requirement Evaluation Matrix** to screen proposed data collections during the drafting process.

SECTION 2: THE BUSINESS CASE

The Problem:

Utah's public education system faces three interconnected structural flaws when new legislative data mandates are enacted:

1. **Rushed Implementation Timelines:** Education bills mandating new data collections typically take effect between April and July, immediately before school starts in August. Configuring Student Information Systems (SIS), vendor contracts, and administrative workflows in 30 to 90 days is functionally impossible, forcing USBE to deploy temporary "stopgap" surveys that yield poor-quality, unreliable data for the first two years of a mandate.
2. **The "\$0 Fiscal Note" Paradox (Hidden LEA Costs):** Current legislative fiscal notes account for state government impacts but routinely list LEA costs as \$0. Mandating new collections shifts hundreds of thousands of dollars in IT, vendor, and staff costs directly onto school districts and charter schools without fiscal visibility or resource allocation.
3. **Lack of Pre-Legislative Screening:** New data reporting requirements are frequently codified without a formal assessment of whether the data is actionable or if the collection effort outweighs the educational benefit, leading to compounding administrative fatigue.

Statewide Data Context (Reporting Requirements Study):

The magnitude of this problem is underscored by the findings of the Reporting Requirements Study:

- Existing LEA Workload: Utah school districts are currently subject to 181 total reporting requirements (63 mandatory), while charter schools

face 177 requirements (56 mandatory). Completing just a sample of these requirements requires an estimated 17,695 hours per LEA annually (equivalent to 8.5 full-time staff members).

- **Agency Facilitation Burden:** USBE must manage and submit 276 distinct reporting requirements, consuming 99,029.5 staff hours annually (equivalent to 47.5 FTEs).
- **Compounding Mandates:** During the 2025 General Session alone, 27 new reporting requirements were established (12 for LEAs, 15 for USBE). In the 2026 Session, an additional 20 requirements were enacted (8 for LEAs, 12 for USBE). Rushing these expanding mandates severely destabilizes ongoing data operations.

The Source:

This request originated from the findings of the State Board's *Reporting Requirements Study* (Utah Code § 53E-3-526) as presented to the Board in August 2026 full board meeting. It operationalizes Recommendation #5 of that report and ensures that Local Education Agencies (LEAs) and USBE have adequate time to configure Student Information Systems (SIS), train personnel, and deliver accurate, actionable data to policymakers.

Projected Results:

If approved, the measurable outcomes in the K-12 system will include:

- 1. Enhanced Data Integrity:** Guarantees decision-ready, validated data for policymakers on day one of required reporting.
- 2. Fiscal Transparency:** Provides legislators and the public with full visibility into the true local costs and taxpayer impacts of proposed education bills.
- 3. Targeted Legislation:** Eliminates low-impact, high-effort reporting requirements before they are codified into state law.

Consequence of Inaction:

Without a statutory implementation runway, legislative mandates will continue to yield low-quality data, strain rural and small LEA operational capacity, and pass uncouneted administrative costs onto local taxpayers.

Evidence & Data:

1. Audit Findings: Internal audits (2022 Data Reliability Audits 22-01-A/B and 2025 Attendance Audit 25-01) confirm that rushed legislative data requests cause systemic unreliability, describing the resulting environment as "rife with inconsistency, contradiction, confusion, and noncompliance."

2. Documented LEA System Costs: Self-reported data from LEAs shows system modifications for new data requests cost \$287,174 annually, while direct legislative changes cost an additional \$268,463 annually.

3. Implementation Disconnect: USBE Standard Operating Procedures (SOP) recognize that proper SIS software updates require 18 months. Statutory implementation dates in July bypass this reality.

4. Recent Case Examples:

Utah Fits All (UFA) Scholarship: Short lead times prevented SIS software from capturing non-enrolled students receiving services, leaving LEAs unable to track student status accurately.

Summer EBT (SEBT): Rushed student address requirements forced LEAs to manually extract latitude/longitude coordinates, creating an immense, unplanned administrative burden.

SECTION 4: POLICY & STATUTE

(Complete only if your request involves changing or eliminating Utah State Code)

Code Sections Affected: New Code

Suggested Legislative Solutions:

1. Standard 18-Month Implementation Runway: Mandate that any legislative enactment establishing a new public education data collection requirement must provide a minimum 18-month lead time between bill enactment and the start of mandatory data collection, structured as follows:

- **Standard / Non-Funded Mandates (May Effective Date):** Data collection shall begin in September of the calendar year *following* enactment (with initial reporting due at the end of that school year).
- **Funded Mandates / Fiscal Note Items (July 1 Effective Date):** Data collection shall begin in January of the calendar year *following* enactment.

Example Timelines:

	Funding Required?	Effective Date	Rule Making Process	SIS programming	Official Data Reporting Begins
Bill Example #1	No funding attached	May 2027	May - August 2027	Summer & Fall 2027	Winter 2028
Bill Example #2	Funding attached	July 2027	May - August 2027	Fall 2027 - Winter 2028	September 2028

2. Legislative Evaluation & Fiscal Note Integration (Study Recommendations #1 & #3):

- **Fiscal Note Transparency:** Amend legislative drafting standards to include estimated **LEA Administrative Burden and SIS Vendor Costs** on legislative fiscal notes for education bills, ensuring policymakers see total taxpayer costs.
- **Mandate Evaluation Criteria:** Require policymakers to evaluate proposed data elements using a USBE *Reporting Requirement Evaluation Matrix* (assessing high/low impact vs. effort) prior to codification.