

Testimony
Dr. Edgar B. Hatrick, III
Committee on Education and the Workforce
U. S. House of Representatives
March 1, 2011

Chairman Kline, Ranking Member Miller, and Members of the Committee:

Thank you for inviting me to testify today regarding the impact of federal regulations and reporting from a public school administrator's perspective.

My name is Edgar Hatrick and I am the Superintendent of Loudoun County Public Schools and also serve as the President of the American Association of School Administrators. Loudoun is a large, growing school district of more than 63,000 students located in Virginia outside of Washington DC. I speak to you from my 45 years of experience as an educator, which includes 20 years as a superintendent.

I'm here to talk to you about the impact of federal regulations and reporting requirements on school districts. Loudoun County Public Schools (LCPS), like school districts across the country, complies with all regulations and reporting requirements of our local school board, our state education agency (SEA) and federal agencies. It is important to note that while Loudoun County Public Schools has resources such as data analysts, program analysts, and a research office with support staff, **70% school districts in the United States have an enrollment of 2,500 or less with very limited staff but with the same regulations and reporting requirements. Fewer resources do not excuse compliance from federal reporting.**

Federal regulations are necessary for program integrity and to implement programs consistent with Congressional intent. However, when compliance with reporting requirements becomes the focus of implementation it sends a powerful message that the process is more important than the product. **In other words, the pressure to comply makes it seem like adherence to data collection and reporting are more important than our mission of teaching and learning.**

Specific regulations, data collection, and reporting vary greatly and are dependent on program, grant, and agency requests. **However, there is overlap, resulting in redundancy of reporting and resources being diverted from the mission of teaching and learning.**

I'd like to share with you an example. **The Office of Civil Rights (OCR) reporting requirement comes with no funding and ignores the availability of this information from State Education Agencies.** The most recent OCR data collection was completed this past December and required aggregating and disaggregating more than twelve categories of data, with more than 144 fields for each of our 50 elementary schools and 263 fields of data for each of our 24 secondary schools, for a total of 13,944 data elements. **And this was just for one school district out of the 13,924 school districts in America.** For LCPS, this required 532 hours of staff time at an estimated cost of \$25,370, which translates into diverting 82 instructional days away from students

The vast majority of the reporting requirements from OCR are seeking data already transmitted to the Virginia Department of Education thus causing duplicate effort.

To inform policy, federal regulations and reporting requirements need to align with the mission of public education to serve students. From my vantage point, it appears that **some federal reporting requirements are not connected to federal programs or funding**. In fact there is often confusion about whether reporting elements are required by the federal government or by our states.

Another reporting area that has limited funding tied to it is IDEA. Federal funding for IDEA provides 9% of the total cost of serving the 6,719 students with disabilities in Loudoun.

Local school districts collect and report data to the State that is used in the State Performance Report as a part of the federal monitoring of IDEA. States, including Virginia, submit data to USED on the outcomes for students with disabilities as a part of the State Performance Report. Currently Virginia collects data for twenty indicators, and Loudoun County Public Schools provides the data on an annual basis. I'd like to describe a one of the twenty indicators on which we have to report.

Indicator 7, "Improving Cognitive and Social Outcomes for Pre-school Students with Disabilities," mandates that a team of professionals must provide developmental information on the entry status of a child into special education. Each report takes approximately 30 minutes to complete per student. It requires input from three professionals: a Psychologist, an Eligibility Coordinator, and an Early Childhood Special Education teacher. Last year we reported on 409 pre-school students, which took 613 hours at an estimated cost of \$25,000. In other words, 94 instructional days again were diverted from instructional support to students in the classroom. And there are 19 other indicators that are as or more complex and costly. Careful thought about what information is really needed versus what is nice to have and use occasionally or not at all ought to be required before school districts are required to gather and report information. I would rather spend on services because the services are mandated to the full extent of the IEP. If compliance is important then the service mandate must be adjusted or funding for IDEA increased.

Loudoun is a growing school district and the number of hours for the collection of these data will continue to increase, while resources continue to shrink.

Again, I realize the importance and value of federal regulations and compliance with reporting requirements. However, when all requirements are treated as equally important, even though not all requirements are equally important, it distracts staff from activities with a high payoff for students.

In conclusion, as you consider policy implications, I pose these propositions:

- Federal agencies must better coordinate, align and limit reporting requirements to be less onerous, redundant and/or duplicative.
- Reporting on implementation of federal regulations should be reduced and more closely linked to the funding provided. And at the end of the day it must be clear that the data were actually and how the data were used so the importance of the data can be judged by Congress and those of us in the field. Policies and regulations should be written so that they support the mission of teaching and learning and limit or eliminate the impression or

actuality that the process of filling in the compliance reports and other regulatory reports is more important than improving educational outcomes for students.