



Joint Letter from Texas Superintendents

September 13, 2024

Texas Education Agency
Commissioner Mike Morath
1701 N. Congress Ave.
Austin, TX 78701

Dear Commissioner Morath,

We are reaching out as a coalition of district leaders representing districts of all sizes across our state to express deep concerns regarding the current plan to implement Ed-Fi for the 2024-2025 school year. Based on the experiences of those districts involved in the parallel and pilot testing phases, it is evident that the systems for TEA, vendors, and districts are not ready to go live.

The purpose of parallel and pilot testing is to verify the accuracy of new processes alongside existing ones. We cannot emphasize enough that success cannot be measured by simply ensuring the API connection between the TEA and vendors functions properly. Rather, success must mean that all data previously uploaded through the old system can be accurately loaded into the new one.

Incomplete and incorrect data will have significant repercussions on districts since funding, reporting, and accountability formulas rely on PEIMS submissions. The potential consequences for the state's data accuracy and districts' financial health are too large to overlook.

Districts have been unable to verify accuracy as the Ed-Fi data could not be reconciled with the XML submissions. The errors we are encountering are not isolated to district-level data but are rooted in the Ed-Fi system itself, as well as how it interacts with vendors and state-specific data requirements. The submitted data was 100% successful in the 2023-2024 XML submissions, highlighting the need for better vendor readiness, improved data verification tools, and stronger support from TEA.

Districts have not received additional funding to update our systems or hire staff to support this transition. In addition to cumulative prior-year unfunded mandates, districts are navigating this transition in a time of significant budget shortfalls across the state in our public schools. The unfunded mandate to transition to the Ed-Fi system in the 2024-25 school year when no one is ready has dire consequences for districts in terms of funding, accountability, and reporting.

We are eager to work alongside TEA to ensure accurate reporting for Texas public schools. We respectfully request that TEA take the necessary steps to provide a safety net for districts this year and delay the implementation until the system is fully operational and properly tested for accuracy.

We would welcome a time to meet with you regarding the severity and significance of this situation. The subsequent pages of this letter contain a list of significant concerns along with possible solutions.

Respectfully submitted from the Superintendents of the following districts:

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Dr. Gerardo Cruz, United ISD
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While not an exhaustive list of the concerns with this transition to Ed-Fi, these represent significant concerns.

TEA Support

- TEA is unable to provide timely resolutions to district TIMS tickets.
- The changes are too rapid, and the system is not ready for 100% implementation.
- As districts submit data, we encounter both vendor and TEA-related issues, with unresolved "kinks" causing complications.

Data Accuracy

- Student records drop off during the data promotion process without generating error messages.
- No LEA was able to test data to 100% effectiveness for any PEIMS or Core Submission.
- Districts have no way to compare accurate data against what is being submitted, as no successful parallel submission has occurred.
- TEA has not provided clear guidance on how staff data will not overwrite in the iODS if submitted from both the SIS and ERP.
- It is a challenge to monitor the data submission process and the accuracy of the data when tools have not been fully developed and very little training has been provided.
- Districts lack confidence that the data in Ed-Fi is valid and equivalent to the XML data submitted, as no comparison has been possible.
- Errors are increasing, many of which are irrelevant to the current submission.

Data Verification Tools

- Districts are unable to compare what data is in our SIS/ERP vs. data in our iODS on the TEA side

- We need verification tools in CSV format that allow us to pull submitted data and compare it to expected results.
- The iODS data search feature is cumbersome, with searches taking hours or even days. We need the ability to search by collection rather than by individual elements.

Operational Challenges

- The system is extremely slow, with updates taking days to reflect Level 1 errors after data is sent to the TEA iODS.
- Even when districts are told to submit data in small batches, the processing time remains excessively long.
- Smaller districts with limited and new personnel are particularly struggling.
- Many districts were unable to fully participate in the parallel process or had to drop out due to security concerns and other challenges.

Vendor Readiness

- Vendors lack sufficient technical staff to address questions and resolve issues.
- Districts are dependent on third-party vendors to submit data, and vendor systems are not fully ready for Ed-Fi submissions.
- The vendor scorecard on the TEA website shows that many vendors are still not prepared. Districts cannot push data to the ODS if vendors are not completely ready, which undermines confidence in the testing process.

We propose the following solutions:

- **Continue XML Submission for One More Year:** Allow districts to submit data using both XML and Ed-Fi for one additional year. This parallel submission would give districts the ability to compare error-free XML data with Ed-Fi data and address discrepancies before full implementation.
- **Postpone Ed-Fi Implementation:** Delay full implementation of Ed-Fi until all vendors can complete all submissions successfully and demonstrate readiness.
- **Hold Districts Harmless:** Provide a system to protect districts from negative impacts during this first year of Ed-Fi implementation.
- **Extend the Parallel Submission System:** Allow districts to continue using parallel submissions (XML and Ed-Fi) to ensure data accuracy.
- **Develop Additional CSV Reports:** All Data Mart PDF reports must be available in CSV to allow districts to validate and compare data. Secondly, create side by side reports to compare XML to Ed-Fi submissions.
- **Enhance Support for Districts and Vendors:** Increase support for both districts and vendors to ensure a smoother transition to Ed-Fi.
- **Expand Training Opportunities:** Provide more training to districts to ensure they are prepared for Ed-Fi implementation and have adequate support.
- **Create District User Groups by Vendor:** Organize user group meetings by vendor type to facilitate communication and problem-solving among districts.
- **Include District Staff in Vendor Meetings:** Allow school district staff to participate in vendor meetings with TEA, providing opportunities for real-time feedback and better alignment with district needs.
- **Independent Accounting Audit:** Utilize an independent firm to conduct an audit of the data submitted in the new system compared to the previous system.
- **Data Privacy and Security:** Provide transparency to school districts on the protection of student data by conducting an audit through an independent firm. Ensure that all data use agreements regarding access to Texas public school data meets stringent legal requirements for student data protection, privacy, and security.