WestEd

Colorado Department of Education: Value Assessment of a Statewide Student Information Solution

Recommendation

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Executive Summary

Colorado's local education agencies (LEAs) carry a significant and variable reporting and fiscal burden in meeting the state's data reporting requirements. The Colorado Department of Education (CDE) engaged WestEd to assess what could be done about it. To complete this assessment, WestEd used several methods to gather information from interest holders, especially Colorado LEAs. These methods were designed to capture a range of perspectives across Colorado. In total, 90 LEAs (45%) engaged in at least one method.

This report is the final deliverable of that assessment. It builds on the Level of Effort Analysis report, which documented the current reporting burden and examined four future options for reducing it, and the Financial Model report, which analyzed the cost implications of each option. Together, these three documents provide CDE leadership and policymakers with the analytical foundation needed to make an informed decision about how to move forward.

What the Analysis Found

This report provides a technical analysis of two solutions informed by the Level of Effort Analysis report, the Financial Model report, and LEA feedback (see Appendix A).



A common Student Information System (SIS), which CDE would procure and LEAs can opt in to, offers the clearest path to near-term burden reduction for participating LEAs. It requires CDE to take an active role in vendor selection, contract management, and data governance. Adoption rates under a voluntary model are uncertain, and the financial case weakens significantly if adoption is limited. If 25% of LEAs adopt the statewide SIS, the total cost of ownership (TCO) remains above the status quo at $71.9M over five years (versus $69.4M for status quo). At 75% adoption, it becomes a clearer improvement at $67.5M. Additionally, Colorado's competitive procurement requirements mean the common SIS contract may be subject to rebid—a risk CDE should address.



A data standard with Application Programming Interface (API) is a modern technical approach for securely passing data from one system to another. This option, which received the strongest LEA support of any option, would preserve local SIS choice. It requires CDE to build new capacity, both in terms of governance and technology. CDE would need to select a data standard, govern an API, and coordinate with vendors. This solution will take more time and be less predictable in terms of timeline. The financial case is closer to cost-neutral than cost-saving—$72.3M over five years and approaching break-even over ten years. As such, this option can be seen more as an investment in modernization.

The analysis also found that the financial burden of state reporting is not evenly distributed across LEAs. Smaller and rural LEAs carry the highest per-student reporting costs and stand to benefit most from any reduction in that fiscal burden.

The Recommendation

Before pursuing a technical solution, CDE should adopt a data standard. A data standard gives CDE a shared language for data across the agency, positions Colorado's infrastructure for long-term modernization, and creates the conditions under which any technology solution can function as intended. Once that foundation is in place, CDE can issue a broader Request for Proposal (RFP) for a technology solution—one that is not limited to traditional SIS vendors and that is grounded in a clear understanding of what Colorado needs and what any vendor delivers.

Other Considerations

Beyond the technical recommendation, this report identifies four areas CDE should address regardless of which path it chooses.

1. CDE should **identify its values and priorities**, as the right technical choice depends on what CDE values most.
2. CDE should **establish the financial and legal groundwork**—securing dedicated funding, addressing contracting requirements, and clarifying legal authority—before committing to a path.
3. CDE should **modernize its own data operations**, including assessing internal capacity, committing to data governance, and streamlining collections.
4. CDE should **build and sustain LEA trust** through clear, sustained communication and engagement throughout implementation.

Moving Forward

The assessment identified several challenges associated with the current state reporting environment, including reporting burden for LEAs, aging infrastructure, and increasing complexity within existing systems. The findings also suggest opportunities to address these challenges through a more coordinated long-term approach to data standards, governance, and technology modernization. LEAs consistently emphasized the importance of timely decisions and clear communication regarding future direction. As CDE considers next steps, maintaining the momentum generated through this assessment and providing interest holders with greater clarity about priorities, timelines, and plans may help support successful implementation of future changes.

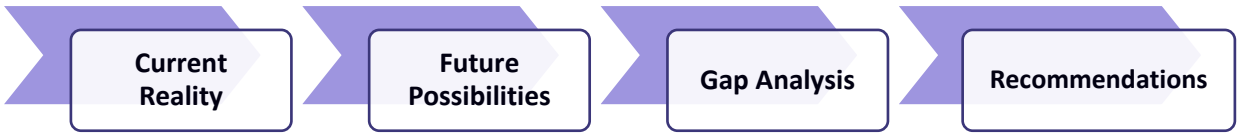
Introduction

Colorado's local education agencies (LEAs) vary widely in how they manage student data reporting to the Colorado Department of Education (CDE), including the systems they use, the staff they rely on, and the burden they carry.

To understand that variation and what could be done about it, CDE engaged WestEd, a research, development, and service organization, to assess the implications of a possible statewide student information solution—examining what Colorado LEAs currently experience, what alternatives could look like, and what CDE would need to consider when deciding how to proceed.

That assessment is organized around four parts (Figure 1).

Figure 1. Steps of Assessment



- **Current Reality:** WestEd examined the student data reporting processes in place across Colorado's LEAs. WestEd identified the systems in use, the workflows followed, the staff effort involved in meeting CDE's submission requirements, and the baseline financial costs.
- **Future Possibilities:** WestEd explored what data collection could look like under a statewide Student Information System (SIS), how processes would differ between an off-the-shelf and a customized solution, and what alternative, non-SIS technologies could reduce LEA reporting burden. WestEd also identified potential integration points between a solution and other software applications, including special education, human resources (HR), and other systems. Finally, WestEd explored the potential total cost of ownership (TCO) for the preferred solutions.
- **Gap Analysis:** WestEd compared the current reality against each future option, examining how much effort a given option would save for a rural LEA, what transition

would look like for a large urban LEA, and what the fiscal implications would be across LEA categories and approaches.

- **Recommendations:** The fourth part synthesized findings into recommendations for CDE's consideration.

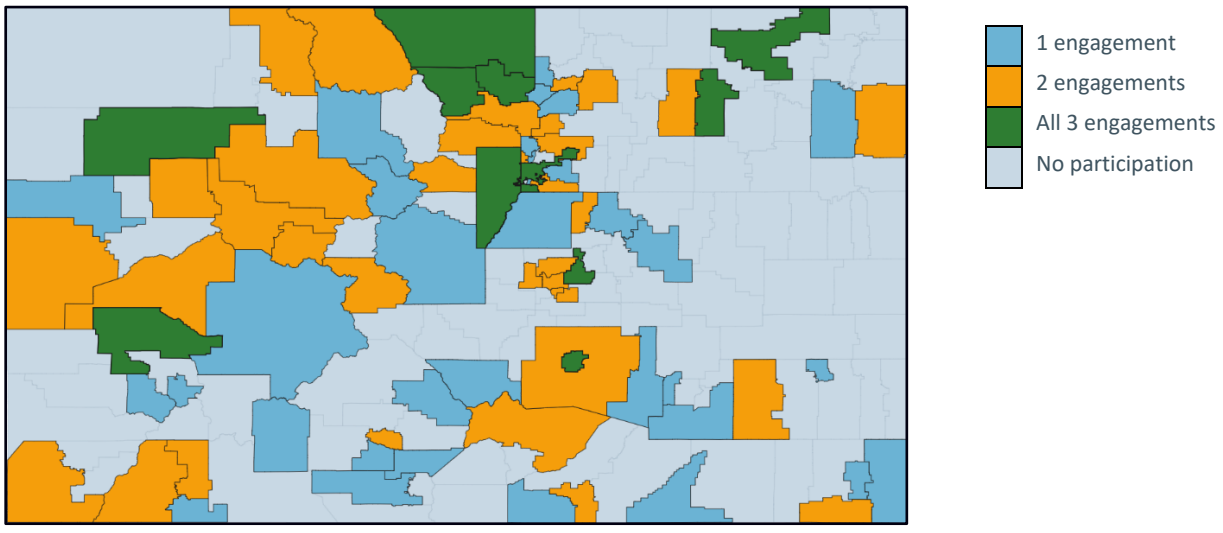
This report is the last written deliverable from WestEd's assessment and will be presented to CDE leadership in June 2026. It builds on the Level of Effort Analysis report, where more details about the current reporting process and each of the technical solutions can be found. It also builds on the Financial Model report, where details on the fiscal implications and the TCO were identified.

LEA Engagement

WestEd used several methods to gather information from Colorado LEAs, CDE staff, and other interest holders. Specific to LEAs, the methods included LEA Information Gathering Session; LEA Interest and Input Form; and LEA Feedback Session, including three in-person sessions and one virtual session. These methods were designed to capture a range of perspectives across LEA sizes, geographic contexts, and roles.

Of Colorado's 202 LEAs, 90 (45%) engaged in at least one of these methods. Of those, 38 (19%) participated in one method only; 38 (19%) participated in two; and 14 (7%) participated in all three. Figure 2 provides a map of the engaged public districts. For a list of LEAs who participated in these methods, see Appendix A. More information can be found in the Level of Effort Analysis report.

Figure 2. Public Districts That Engaged in the Assessment



Note. See Table 3 for a corresponding data table.

Technical Solution

The Level of Effort Analysis examined four future possibilities for Colorado's state reporting:

1. **Common SIS:** CDE would procure a single SIS to be used by Colorado LEAs. The state would negotiate a contract with one SIS vendor on behalf of participating LEAs, covering licensing at both the state and LEA levels as well as vendor support for implementation and training. The common SIS would serve two functions. For LEAs, it could replace their local SIS as the system of record for day-to-day student data management. For CDE, it would serve as the primary source for state data collection, replacing the current process in which LEAs extract and submit files to the Data Pipeline.
2. **Enhance or Overhaul the Data Pipeline:** CDE currently collects data from LEAs using the Data Pipeline. This option focuses on improving the Data Pipeline. There is a wide range of possible improvements, from targeted enhancements that could reduce specific friction points to a substantial overhaul.
3. **Vendor Solution:** CDE would procure a purpose-built data collection and submission platform that would replace the Data Pipeline. The solution would sit between local SIS platforms and CDE. LEAs continue using whatever local SIS they choose, but state reporting flows through the vendor platform before data reaches the state.
4. **Data Standard[1] and Application Programming Interface (API)[2]:** CDE would first adopt shared data definitions, also called data standards. Then CDE would leverage API frameworks already developed around data standards and used in other states. This would allow local SIS vendors to automatically send data directly to CDE, bypassing the Data Pipeline file upload function altogether.

For each possibility, the Level of Effort Analysis provided a comparative overview, an analysis of how the state reporting process would change, external system and integration considerations, rollout options, pros and cons, and case studies from other states that have implemented similar approaches.

These possibilities were then presented to LEAs through three in-person feedback sessions and one virtual session, with a follow-up survey for participants. A total of 130 people from 64 LEAs

[1] A data standard is a shared agreement about what data elements mean and how they should be structured, enabling different computer systems to exchange information consistently without manual translation or reformatting. Without a common standard, two systems that both track student enrollment might store or label that information differently, making it difficult to combine or compare data across systems.

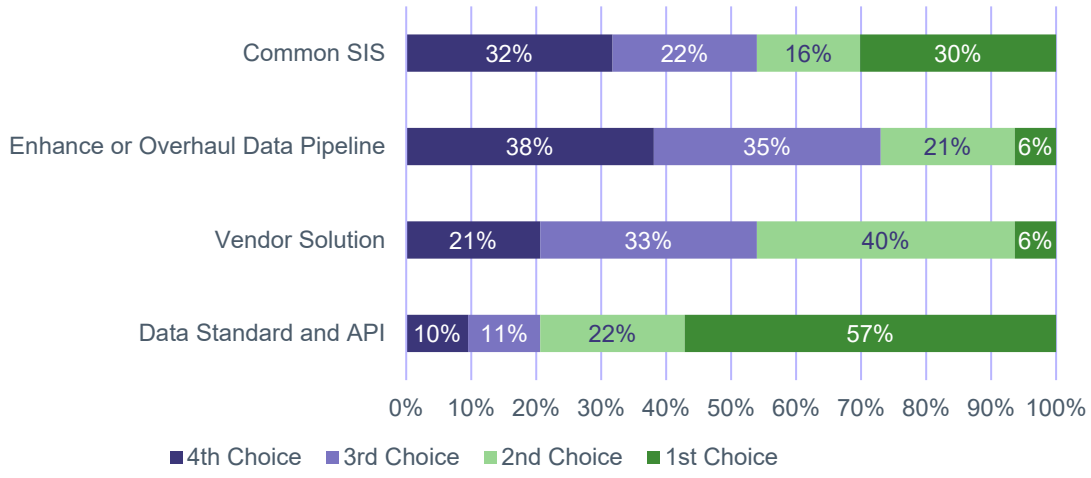
[2] An application programming interface, or API, is a mechanism that allows two or more computer systems to communicate and exchange data automatically. When one system needs data from another, it sends a request through the API. The receiving system processes that request and returns the data—without requiring manual file exports, reformatting, or uploads.

(32%) participated in at least one session. Following the sessions, participants were invited to complete a follow-up survey: 63 people from 48 LEAs (24%) responded. The majority of respondents (56%) were Data Managers or SIS Administrators. For a list of participating LEAs, including those who attended the feedback sessions and completed the follow-up survey, see Appendix A.

LEA participants expressed the clearest support for a **data standard and API** approach—74% supported CDE pursuing it, 86% found it feasible, and 75% agreed it would meaningfully reduce their reporting burden. Support for a **common SIS** was more divided: 68% agreed it would meaningfully reduce reporting burden, but only 38% found it feasible, and overall support for CDE pursuing it was split. LEA feedback on these two solutions can be found in Appendix A. By contrast, while LEAs found **enhancing or overhauling the Data Pipeline** feasible (78%), only 21% believed it would meaningfully reduce reporting burden—and participants widely described it as investing in aging infrastructure without addressing the underlying sources of burden. The **vendor solution** was found feasible by 78% of participants, but only 42% believed it would meaningfully reduce reporting burden, and participants expressed measured curiosity rather than clear support. A full analysis of all four options, including detailed LEA feedback, is available in the Level of Effort Analysis report.

When asked to rank the options from 1 to 4, the clear preference was data standard with API (57% first choice, 22% second choice) and the clearest resistance was enhance or overhaul the Data Pipeline (6% first choice, 21% second choice). Common SIS and the vendor solution tied for the middle, with 46% selecting either first or second choice (Figure 3).

Figure 3. LEA Participant Option Rankings



Note. See Figure 12 for a corresponding data table.

Of the four options, enhancing or overhauling the Data Pipeline and pursuing a vendor solution did not advance. LEAs were skeptical that either would meaningfully reduce their reporting burden and neither option generated strong LEA support for CDE pursuing it.

The Financial Model report examined the cost implications of various options.

1. Mandatory state-funded statewide SIS
2. Voluntary split cost (State/LEA sharing) statewide SIS
3. Voluntary hybrid model (State-Funded Core + Optional Local Add-Ons) for State Reporting
4. Other technical solutions, especially an API/reporting layer

The Financial Model report estimated a total cost of ownership (TCO) for each option, drawing on conversations with other states, publicly available technology contract records, the 2019 Wyant Value Assessment[3], and LEA survey and interview data (Table 1). The **mandatory statewide SIS model** generates the lowest TCO, with $11.0M in one-time implementation costs, $9.8M in Year 1 recurring costs, $62.8M over five years, and $122.9M over ten years. Relative to the status quo, the mandatory SIS model reduces the cost burden over five years by 9.6% and 18.1% over ten years. The **voluntary hybrid model** is more plausible in a local-control environment but more sensitive to adoption costs. If 25% of LEAs adopt the statewide SIS, the TCO remains above the status quo at $71.9M over five years. At 50% adoption, it reaches a near break-even at $69.7M, and at 75% adoption it becomes a clearer improvement at $67.5M over five years and $135.1M over ten years. The **API/reporting-layer model** does not produce short-run savings ($72.3M over five years), but it is close to cost-neutral over ten years ($149.3M versus $149.9M under the status quo), and it carries much lower migration disruption.

[3] Wyant Data Systems. September 2019. *Value Assessment of a Statewide Student Information System: Results and Recommendations.* Prepared for the Colorado Department of Education.

Table 1. Initial, 5-Year, and 10-Year Total Cost of Ownership, by Financial Model

Model	Initial / Year 1 recurring	5-Year TCO	10-Year TCO	Read-through
Status quo	$0.0M initial; $13.1M recurring	$69.4M	$149.9M	Keeps current local contracts and modeled hidden burden.
Voluntary hybrid – 25%	$6.4M initial; $12.3M recurring	$71.9M	$147.7M	Useful lower-bound voluntary case; still above status quo at 5 years.
Voluntary hybrid – 50%	$7.8M initial; $11.7M recurring	$69.7M	$141.4M	Near break-even over 5 years; stronger over 10 years.
Voluntary hybrid – 75%	$9.2M initial; $11.0M recurring	$67.5M	$135.1M	Begins to show clear savings if adoption is broad.
Mandatory statewide SIS	$11.0M initial; $9.8M recurring	$62.8M	$122.9M	Lowest modeled TCO, but highest migration and governance burden.
API/reporting layer	$5.8M initial; $12.5M recurring	$72.3M	$149.3M	Lower-disruption modernization path; closer to cost-neutral than cost-saving.

When considering the cost at the LEA level (Table 2), rural LEAs are the clearest economic beneficiaries of stronger statewide services, because their recurring cost burden is much higher than that of other LEAs. Urban/suburban and Denver metro LEAs show a more mixed result. The financial case depends less on raw license savings and more on whether statewide alignment offsets the costs of local integration, migration, and change management.

Table 2. Per-Student Recurring Cost, by LEA Category and Model

LEA Category[4]	Status Quo	Voluntary Hybrid SIS	Mandatory Statewide SIS	API/ Reporting Layer	Primary Financial Implication
Rural	$26.42	$15.69	$11.79	$23.48	Largest upside under common or hybrid models; strongest equity case for state support.
Urban/Suburban	$7.90	$9.61	$10.18	$8.26	Mixed economics: hybrid and API models are easier to stage than a full common platform move.
Denver Metro	$9.54	$10.25	$10.93	$9.92	Migration complexity and sunk integrations remain the largest caution in centralized models.

[4] See Appendix A for definition of LEA Category.

The mandatory statewide SIS model produces the lowest TCO but carries the highest migration burden and may not be feasible given Colorado's local-control tradition. The voluntary hybrid and API/reporting layer models offer more realistic paths, with cost savings under the voluntary hybrid depending heavily on adoption rates and the API model framed as a modernization investment rather than a cost-cutting strategy. The full analysis of the financial models is available in the Financial Model report.

This report focuses on two options.

1. Moving to a common SIS
2. Moving to a data standard with API

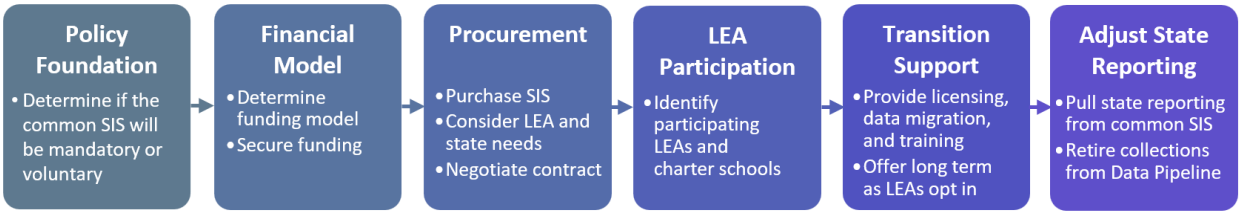
These two options demonstrate the strongest combination of LEA support and potential for meaningful reporting and fiscal burden reduction.

Analysis of Moving to a Common SIS

Moving to a common SIS requires CDE to make a series of interdependent decisions before implementation can begin. The sequence matters—some decisions are prerequisites for others, and the financial and operational implications of each compound across the full scope of the work. At a minimum, CDE would need to do the following:

- Determine whether the common SIS will be **mandatory or voluntary** for Colorado LEAs.
- Determine what **financial model** will be used (e.g., state-funded, split costs, state-funded core with optional local add-ons) and secure the necessary **funding**.
- **Procure a single SIS** for use by Colorado LEAs, negotiating a contract with one vendor on behalf of participating LEAs with requirements that reflect both state and LEA needs.
- Identify **participating LEAs**—those that currently use or intend to adopt the common SIS.
- Provide **licensing, data migration, and training** for participating LEAs, with a long-term commitment to onboard LEAs that opt in over time.
- Adjust **state reporting** to capture relevant collections through the common SIS and retire those collections from the Data Pipeline.

Figure 4. CDE Tasks and Decision Flowchart, Common SIS



Mandatory or Voluntary

Whether the common SIS is mandatory or voluntary has a significant impact on the success and scope of this work. A **mandatory model**—one that requires all LEAs to adopt the common SIS within a defined timeline—delivers the clearest path to full burden reduction for both LEAs and CDE, as well as the strongest financial case. However, requiring all LEAs to give up their local SIS is a significant imposition in a state with a strong local-control tradition, and a mandate would likely require legislative action and sustained commitment over a multi-year implementation period. A **voluntary model**—one that allows LEAs to opt into using the common SIS—is more feasible but substantially changes the financial and burden-reduction calculus. The Financial Model report finds that meaningful cost savings under a voluntary model do not emerge until adoption reaches 50 to 75% (101 to 152) of LEAs. Adoption rates at that scale are not guaranteed in Colorado, where LEAs have made significant investments in their existing systems and where SIS transitions are among the most operationally difficult changes an LEA can undertake. Under a voluntary model, CDE should also sustain a parallel submission pathway for non-participating LEAs indefinitely, which adds ongoing cost and operational complexity.

Analysis

Given Colorado's strong local-control tradition, a voluntary model might be the most realistic and feasible pathway for an SIS solution. This means the financial and burden-reduction benefits of the common SIS would depend heavily on adoption rates over time—and CDE would have to plan accordingly.

Financial Model and Funding

CDE should also decide if the associated costs of a common SIS will be shared between the state and LEAs and how that commitment will be funded. There are three primary models:

- **Mandatory state-funded model**, in which the state centrally procures the common SIS and covers all costs on behalf of LEAs. This model provides the greatest relief to LEAs and is most likely to drive adoption—particularly among rural LEAs, which carry the

highest current fiscal burden but have the least budget flexibility. However, this model is mostly relevant if the common SIS is mandated.

- **Voluntary, split cost model**, in which the state and LEAs share costs, reduces state expenditure but introduces a financial barrier that could deter the smaller LEAs most likely to benefit.
- **Voluntary, hybrid model**, in which the state funds a core set of functionality while LEAs cover optional add-ons or local customizations, attempts to find a balance. However, this requires a clear definition of what constitutes core functionality versus optional add-ons. This model is recommended based on WestEd's fiscal analysis.

Each model carries different implications for LEA participation and equity.

The financial case for the common SIS under a voluntary model is sensitive to adoption rates. The Financial Model report finds that 25% adoption would cost more than the status quo, a 50% adoption rate would be about even with the status quo, and a 75% adoption rate would see cost savings from the status quo.

Regardless of which funding model CDE pursues, it should explore supplementary funding sources to offset initial implementation costs. The federal Statewide Longitudinal Data Systems (SLDS) grant program has historically supported states in building and improving education data infrastructure, and Colorado should monitor grant competitions for opportunities that align with this work. However, federal grant funding should not be treated as a reliable primary source—grant competitions are competitive, award cycles are uncertain, and ongoing operating costs will require a durable state funding commitment regardless of what one-time grant funding covers.

Analysis

Given Colorado's current funding reality and the uncertainty of any future federal grant opportunities, CDE will need to secure new, dedicated state funding to implement and sustain a common SIS. The voluntary, hybrid option is the recommended model, but it relies on high adoption rates to achieve financial benefit. A funding request to the legislature should be grounded in realistic adoption projections and should account for the long-term obligation to onboard LEAs over time—not only the costs of initial procurement and early adopters.

Procurement of Common SIS

The quality of the Request for Proposal (RFP) is one of the most consequential decisions CDE will make in this process. Not only should the RFP address state reporting requirements, it should also support LEA operations. A common SIS that does not meet operational needs means it will be underused and drive neither burden reduction nor cost savings. A common SIS that serves only state reporting is not a common SIS that LEAs will adopt or sustain.

Identification of the requirements will be essential. CDE should identify the basic requirements that the SIS should have to support state reporting and integrate within its technology infrastructure. CDE should also engage LEAs directly in defining business requirements before the RFP is released, ensuring the procurement reflects the full scope of what both LEAs and CDE need from the system. At a minimum, the RFP would likely require that the common SIS would support the core functions LEAs depend on daily *and* the state will need for reporting, including enrollment and registration, attendance, scheduling, gradebook, and behavior and discipline. CDE should consider other SIS modules that may streamline state reporting for special education, assessment, and food services. CDE should also require the SIS to support integration with the third-party systems LEAs use for state reporting, such as finance and HR systems. The RFP will also need to include LEA-specific needs such as online registration, parent communication, and payment processing. These may not have anything to do with state reporting, but they are key for LEAs to see value in the common SIS.

Beyond LEA operational needs, the RFP should address the following:

- **Non-participating LEA uploads:** A mechanism by which non-participating LEAs can submit data into the common SIS, so that CDE can retire SIS-originated Data Pipeline collections regardless of whether all LEAs adopt the system.
- **CDE infrastructure connection:** Demonstrated data flow from the common SIS into CDE's data warehouse and reporting environment, with the vendor's role in that connection clearly defined.
- **Data standard alignment:** If CDE adopts a data standard, the common SIS should be aligned with that standard to remain compatible with Colorado's long-term direction.
- **Transition support:** Data migration from local SIS platforms, system configuration to Colorado's data definitions and code sets, and training for all LEA staff whose work touches the SIS, not only Data Managers.
- **Data roles and access:** Configurable role-based access controls that reflect Colorado's organizational structure, including the ability for authorizing entities to view and interact with charter school data, for Boards of Cooperative Educational Services (BOCES) to access member LEA data where applicable, and for CDE to access data across all participating LEAs without exposing one LEA's data to another.

- **Data security:** Independent security due diligence on any finalist vendor, with minimum contract requirements including multifactor authentication, encryption standards, data residency, and breach notification obligations.
- **Vendor relationship and stability:** Defined escalation paths, performance reviews, and contractual protections ensuring CDE retains full access to all data in the event the vendor is acquired, dissolved, or otherwise unable to continue service, including data export rights and transition assistance obligations.

Analysis

CDE will need to invest significant time and resources in developing the RFP, with direct LEA input on business requirements. Getting the procurement right is a strategic decision that will shape LEA adoption rates and long-term system performance—a procurement that is too narrow or poorly scoped will compound the problems it is intended to solve.

Participating LEAs

Once the common SIS is procured, CDE will need to identify which LEAs are likely to opt in at the outset, as this will shape both the procurement and the initial implementation plan. In WestEd's review, some of the local SIS vendors currently serving Colorado LEAs have served as a common SIS or state reporting solution in other states. Assuming that one of the local SIS is selected as the common SIS and assuming that the common SIS will be voluntary, there are three situations an LEA may be in:

- **Participating LEAs that currently use the selected vendor:** These LEAs will likely opt into the common SIS without a local SIS transition. Their reporting burden to the state will largely disappear, and their transition burden will be minimal.
- **Participating LEAs that opt in to the common SIS:** These LEAs will choose to adopt the common SIS despite needing to transition from their current local SIS, likely because of the fiscal incentive, the reduction in state reporting burden, or features the common SIS offers that their current system does not. Their transition burden will be high, but they accept that cost in anticipation of lower long-term burden.
- **Non-participating LEAs:** These LEAs will retain their local SIS because its functionality, customizations, and integrations outweigh the benefits of the common SIS. They will face no transition burden but will continue to bear the burden of state reporting.

Under a voluntary model, participation can shift over time. It is most likely that non-participating LEAs choose to opt in as circumstances change—budget constraints, Data Manager turnover, or dissatisfaction with their local SIS.

Student population matters in this analysis because SIS vendors typically base the license per-unit price on the number of students. Because CDE would purchase licenses on behalf of all participating LEAs, a larger student population covered by the common SIS increases CDE's negotiating leverage and the likelihood of a lower per-unit price.

Colorado's charter school landscape adds complexity. Charter schools often select and contract for their own SIS independently of their authorizing LEA. Under a voluntary model, an LEA may adopt the common SIS while its charter schools do not, or charter schools may wish to adopt the common SIS while their authorizing LEA does not. CDE will need a clear policy on charter school participation—including whether authorizing LEAs can require their charter schools to use the common SIS—before implementation begins. With the common SIS, LEAs can review charter school data and work directly with their charters to address data quality issues before CDE pulls the data for reporting.

Analysis

Under a voluntary model, initial adoption will be concentrated among LEAs that already use the selected vendor, as their transition burden is minimal. Broader adoption will depend on CDE's ability to demonstrate value to LEAs using other vendors and to sustain the financial and logistical support needed to onboard them over time. Adding participating LEAs will both streamline state reporting and increase CDE's negotiating leverage for more favorable licensing terms.

Licensing, Transition Support, and Training

CDE will need to consider funding three categories of ongoing cost for the participating LEAs: licensing, transition support, and training. These are not one-time expenses—they recur as new LEAs opt in over time and as the system evolves.

- **Licensing** covers the basic cost of the common SIS for all participating LEAs. Because CDE would purchase licenses on behalf of participating LEAs, the per-unit cost should be lower than what individual LEAs could negotiate independently. As participation grows, CDE's negotiating leverage increases—but so does the total licensing obligation. CDE should plan for licensing costs to grow incrementally as adoption expands.
- **Transition support** covers the work required to bring a new LEA onto the common SIS—migrating data from the local SIS, configuring the system to the LEA's needs, and setting up the infrastructure. This work is vendor-intensive and LEA-specific. CDE should ensure the RFP defines what transition support the vendor is contractually obligated to provide and at what cost.
- **Training** covers instruction for all LEA staff, not only Data Managers. This is a broader audience than state reporting alone, and the training commitment should reflect that.

CDE should consider a layered approach including in-person trainings on Colorado-specific requirements as well as vendor-provided self-paced resources for staff onboarding.

The commitment to fund all three of these cost categories cannot be time-limited. LEAs will need time to evaluate whether the common SIS meets their operational needs before deciding to opt in. CDE should expect a long-term obligation and budget accordingly from the outset.

Analysis

The costs of licensing, transition support, and training are not front-loaded—they grow as adoption grows and persist as long as the common SIS is in operation. CDE should treat this as a sustained, long-term budget obligation from the beginning. A funding model that covers only initial procurement and early adopters will leave CDE unable to support LEAs that opt in later, undermining the voluntary model's long-term viability.

State Reporting

Under a common SIS model, state reporting looks different whether an LEA is participating or not.

- For **participating LEAs**, data entry into the common SIS serves both day-to-day operations and state reporting simultaneously. CDE would access data directly from the common SIS rather than receiving file extracts through the Data Pipeline, effectively eliminating the submission workflow for those LEAs. CDE would also need to implement state reporting rules within the common SIS—including field configurations, controlled values, and code set crosswalks—to ensure data are entered consistently and meet state and federal reporting requirements. This may change how participating LEAs that already use the selected vendor interact with the common SIS.
- For **non-participating LEAs**, CDE would require that data be uploaded directly into the common SIS using standardized extracts from their local SIS. This means CDE would need to define extract requirements, file specifications, and submission timelines that non-participating LEAs and their SIS vendors should meet.

Once the common SIS is operational and non-participating LEA upload requirements are in place, CDE can retire relevant collections from the Data Pipeline.

Analysis

The retirement of SIS-originated Data Pipeline collections is contingent on both the common SIS being fully operational for participating LEAs and the extract-upload process being in place for non-participating LEAs. CDE should not retire Data Pipeline collections until both conditions are met.

Fiscal Implications

There are numerous implications for Colorado in moving to a common SIS. The strongest case for this model is not simply that it may lower software prices—it is that it offers the greatest opportunity to convert a decentralized collection of locally optimized systems into more coherent public infrastructure, potentially yielding greater cost efficiencies in the future. At the same time, this is also the model that most directly collides with Colorado's organizational realities. Both the 2019 Wyant Assessment and WestEd's own data collection in 2026 confirm this circumstance.

The lowest estimated TCO for a common SIS, which is based on a mandatory model, includes an initial one-time investment of $11M and approximately $9.8M in recurring investments over time (Table 1). Survey and interview data suggest that a common SIS would be most valuable in LEAs that rely on one or two specialized staff members and where local Information Technology (IT) capacity is thin. However, the same data show that larger LEAs have built substantial local structures for staffing, integration, and training around their current SIS environments. That evidence supports treating the mandatory common SIS as the highest upside financially but highest transition-risk scenario, which may offset any savings achieved through centralization.

Implementation Timeline

Figure 5. Possible Implementation Timeline, Common SIS



Implementation can be relatively quick. Once the common SIS is selected, it will take about one year to set up the infrastructure and build the system for Colorado. The system should go live

with those LEAs that currently use the selected vendor in Year 2. After that, the common SIS can onboard LEAs that want to opt in on a rolling basis. Burden relief begins in Year 2 for participating LEAs. Non-participating LEAs will continue to submit data likely through extracts from their local SIS and into the common SIS. This timeline and the time it will take for LEAs to opt in support the need for the common SIS contract to have an extended end date, ideally 10 or more years.

Procurement Cycle Risk

For this solution to be successful, CDE should explore what procurement cycle will be required for a common SIS. Colorado's competitive procurement requirements dictate if and when a contract will expire and be subject to rebid. CDE has experienced this dynamic in other contexts, most recently with the selection of a different assessment vendor. If the rebid for the common SIS results in a new vendor selection, LEAs that adopted the common SIS would face a transition—with the same operational disruption that characterizes the first.

Often, states can justify an extended contract timeline or a sole source designation. For example, the common SIS vendor could clearly and justifiably be the only practicable source for providing the specifications that meet all requirements LEAs and CDE needs. The common SIS could fall under software maintenance and renewals, which may also be exempted from regular rebids. Others may seek approval to extend the contract length (e.g., five to ten years) because of the cost savings that the vendor may offer or the undue burden for CDE and LEAs if the common SIS could be replaced sooner. CDE may likely need prior approval from the Chief Procurement Officer before the common SIS contract is even solicited.

Analysis

The long-term viability of the common SIS depends in part on CDE's ability to structure a contract that provides stability for LEAs beyond a standard procurement cycle. CDE should engage the Chief Procurement Officer early—before the RFP is released—to determine what contract provisions are applicable and what approvals are required to pursue them.

What the Common SIS Analysis Does Not Address

The analysis presented in this section focuses on the experience of LEAs submitting data to the state. There are several additional considerations that fall outside that scope but that CDE should account for in any implementation plan.

- **Non-SIS State Reporting:** A common SIS likely cannot serve data collections that originate outside the SIS—including finance, HR, and certain special education data that reside in separate systems. The Data Pipeline may need to remain operational for those

collections regardless of how widely the common SIS is adopted. CDE should consider these non-SIS state reporting requirements when considering options for the future.

- **Data Warehouse and External Systems:** When the common SIS becomes the primary data source for state reporting, CDE will also need to reconfigure the processes that currently draw from the Data Pipeline as a source—including the processes that populate the data warehouse—to pull from the common SIS database instead. Differences in data structure and definitions between the two systems will require mapping and validation before the warehouse can receive data reliably.

Analysis

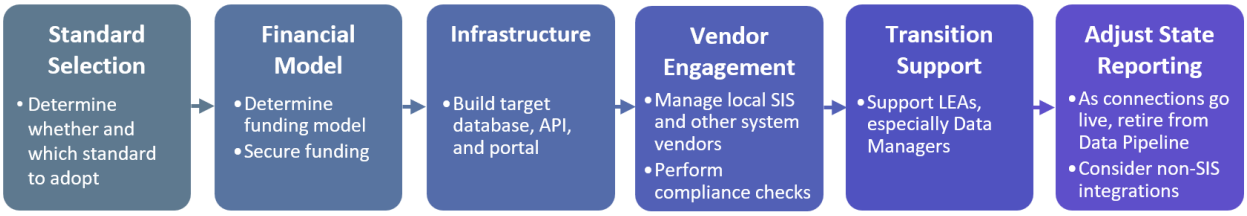
Beyond the implementation of a common SIS, the costs and complexity of maintaining non-SIS reporting infrastructure and reconfiguring back-end data processes are additional obligations that should be factored into CDE's implementation planning and budget requests from the outset.

Analysis of Moving to a Data Standard with API

Moving to a data standard and API approach requires CDE to make a series of decisions and investments before implementation can begin. Rather than replacing local SIS platforms, this path standardizes how existing systems exchange data with CDE. At a minimum, CDE would need to do the following:

- Determine whether to adopt a **data standard** and which one.
- Determine what **financial model** will be used and secure the necessary **funding**.
- Build or procure **receiving infrastructure**—the data standard target database, API, and LEA-facing portal for error reports and data access.
- **Manage local vendor** engagement and compliance.
- **Support LEAs** through the transition.
- Adjust **state reporting**, including non-SIS collections, and retire the Data Pipeline.

Figure 6. CDE Tasks and Decision Flowchart, Data Standard with API



Data Standard

The first and most consequential decision CDE should make is whether to adopt a data standard and, if so, which one. This decision is a prerequisite for everything else in this section—it shapes any RFP, the expectations CDE sets for SIS vendors, and the long-term architecture of Colorado's data environment.

Without a data standard, CDE would need to build and maintain a separate API connection for each local SIS platform and possibly with specific LEAs even though they may share a local SIS platform. That is not a sustainable architecture. Adopting a data standard allows CDE to work from a shared specification that SIS vendors can implement once and reuse, reducing the burden of vendor onboarding and allowing Colorado to build on implementation work already done elsewhere.

Several data standards exist in the K–12 education space, including Ed-Fi, the Common Education Data Standards (CEDS), and Schools Interoperability Framework (SIF). CDE should evaluate which standard best fits its existing data structures, collection requirements, and the vendor landscape already serving Colorado LEAs before committing to a path.

Analysis

CDE should adopt a data standard to support state reporting, but the consequences extend beyond. Once adopted, the data standard will serve as the foundation on which all subsequent infrastructure, vendor engagement, and LEA support decisions rest—even beyond the focus of state reporting.

Financial Model and Funding

Unlike the common SIS, the data standard and API path does not involve CDE purchasing a product on behalf of LEAs. LEAs retain their local SIS and continue to pay their own licensing costs. CDE's financial obligation is focused on the state side—building or procuring receiving infrastructure, governing the data standard, managing vendor relationships, and staffing the support functions the system requires.

This technical solution should be understood as a modernization and burden-reduction investment rather than a short-run cost-cutting strategy. In the near term, this solution is closer to cost-neutral than cost-saving. Even though the financial case strengthens over time as vendor compliance increases and the Data Pipeline is retired, the path to those savings is longer and less certain than under a common SIS model.

CDE could explore supplementary funding sources to offset initial infrastructure costs, including federal SLDS or foundation (e.g., Michael & Susan Dell Foundation) grant opportunities. As with the common SIS, grant funding should not be treated as a reliable primary source. A durable state funding commitment will be required for ongoing infrastructure maintenance, vendor coordination, staffing, and LEA support—costs that persist regardless of one-time grant funding.

Analysis

CDE's funding request should be framed accordingly—as an investment in infrastructure that reduces LEA reporting burden over time and positions Colorado's data reporting environment for the future, not as a cost-cutting measure with immediate returns.

Infrastructure

For the data standard and API approach to function, CDE needs some key technology infrastructure. This is the foundational infrastructure investment that should be in place before any vendor or LEA can submit data.

CDE will need APIs that connect LEA systems to the state's receiving infrastructure. CDE can either develop these APIs internally or work with a vendor partner to build and maintain them. Regardless of who builds them, the APIs should be configured specifically for Colorado—accounting for Colorado's data definitions, collection requirements, validation rules, and any state-specific extensions to the chosen data standard. Even when a data standard includes a reference API, meaningful development work remains. The API will need to be implemented and tested with each vendor before their LEAs can submit data. This work is not a one-time task. As collection requirements change, the API configuration should be updated and re-tested, creating an ongoing development and maintenance obligation for CDE or its vendor partner.

CDE will also need a target database capable of receiving API transmissions formatted to that standard. Some data standards recommend a particular database structure, so CDE should evaluate whether that recommended structure meets its needs. Building or procuring that infrastructure is an investment. Over the longer term, CDE would also need to determine how to populate its data warehouse from the new target—either by cross-walking data from the new system to the existing warehouse structure, or by migrating the warehouse itself to align

with the data standard. The latter is the more sustainable path but requires a long-term commitment rather than an immediate requirement.

CDE will likely also need an LEA-facing portal—a secure web application through which LEAs can view submission status, access error reports, and interact with data returned from CDE. Data Managers will need a way to see what was submitted, what errors were flagged, and what data CDE holds. Authorizing entities need visibility into charter school data submissions, so that LEAs can review charter school data and work with their charters to address data quality issues. CDE could use the portal to implement any review and sign-off workflow. Wisconsin's WISEdash and Texas Student Data System (TSDS) serve this function in those states, and Colorado would likely need its equivalent.

Analysis

Whether on its own or with a vendor partner, CDE will need to make sustained investments in its technical infrastructure before the data standard and API approach can function as intended. The same infrastructure can support returning data to LEAs in useful forms and could eventually be applied to other CDE and LEA operations, making the investment more broadly valuable over time.

LEA Vendors

CDE should reach out to LEA vendors early, establishing clear expectations about the data standard, the timeline for compliance, and the testing and certification process vendors will need to complete before their LEAs can submit via API. These vendors include local SIS vendors but may also include other systems used for special education, finance, and HR reporting. They may also include vendors that support charter schools. Sequencing vendor engagement or piloting the solution with certain LEAs will help CDE learn and adjust—testing the infrastructure, refining specifications, and establishing support processes before expanding to others.

Large LEAs may choose to build an API connection from their own data warehouse rather than their local SIS or other systems. CDE could accommodate this approach while establishing clear expectations about who is accountable for compliance and data quality under that arrangement.

Analysis

CDE should establish a formal vendor engagement process, including regular communication, shared testing infrastructure, and a defined certification pathway, before asking vendors to begin building connections.

Support for LEAs

For LEAs, the data standard and API path requires the least near-term disruption of any option. There is no SIS to replace, no new system to learn, and no mandate to comply with before infrastructure is ready. The expectation shifts from meeting submission deadlines to keeping data accurate in the local SIS on an ongoing basis.

However, Data Managers will need to understand what the data standard means for how data are entered, how to interpret error reports returned through the LEA-facing portal, and how to work with their vendor if issues arise. CDE should plan for a training and support model that addresses these needs and that evolves as vendor connections go live and as the system matures.

LEAs whose vendor is slow or unwilling to build a compliant API integration will continue to submit data through the Data Pipeline until their vendor complies—or until the LEA changes vendors. CDE should be transparent with LEAs about where their vendor stands in the compliance process so that LEAs can make informed decisions about their local SIS contracts. Charter schools in this situation face the same dynamic, and CDE's communication strategy should include charter schools and their authorizing entities.

Analysis

CDE should invest in clear, timely, and ongoing communication about the data standard, API needs, and vendor compliance status. This solution is a multi-step process that will unfold over years, and LEAs should never be left uncertain about what is required of them or when.

State Reporting

Under this technical solution, the Data Pipeline may no longer be needed. As local SIS connections go live, CDE can begin retiring individual Data Pipeline collections—starting with the LEAs that have active API connections and working toward full retirement of those collections for all LEAs. The data standard and API framework also creates a path toward integrating non-SIS collections that currently flow through the Data Pipeline. Finance systems, HR systems, and special education management systems could eventually submit data via API if their vendors align with the data standard and implement an API. Whether those vendors will do so, and on what timeline, is an open question, but the CDE architecture should support it. CDE should monitor vendor readiness as part of its broader data standard governance work and consider how to sequence integrations as the reporting framework matures. If all state reporting can be accommodated through the data standard with API, the Data Pipeline could be retired.

Analysis

CDE should communicate when a state report will be retired, replaced by the data standard and API to ensure LEAs and vendors plan accordingly. The potential to extend the API framework to non-SIS collections is a long-term opportunity that CDE should plan for, even if it is not an immediate priority.

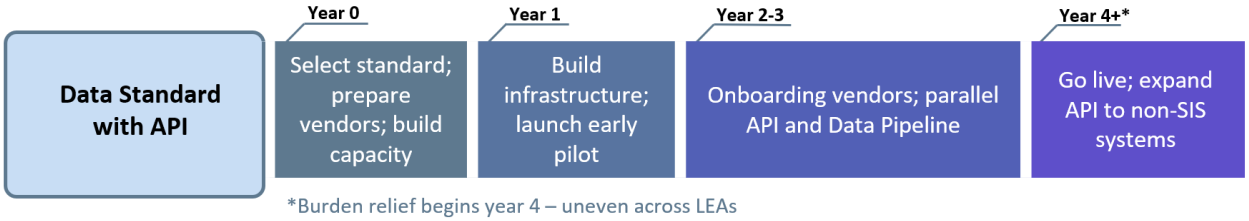
Fiscal Implications

There are numerous implications for CDE in moving to a data standard with API. This model is not a residual category but a serious alternative pathway. The Level of Effort Analysis report makes clear that some of the most substantial burdens are not financial. The burden lies in the workflow, validation, file transfer, and interoperability problems. That distinction matters. It suggests that Colorado may be able to achieve a meaningful share of the public value associated with a common SIS through a different technical architecture, one built less around a single platform and more around stronger interoperability, better automated data exchange, and modernization of the state's reporting environment.

The TCO estimates include an initial one-time investment of $5.8M and approximately $12.5M in recurring investments over time. In Colorado, this path may be the most viable near-term option because it respects the basic structure of local control while still addressing the areas where fragmentation is most costly. It could include state-required technical standards that local SIS vendors should meet to serve Colorado LEAs, deeper state–vendor collaboration on state reporting changes, and a procurement-support component for LEAs seeking better pricing, without giving the state direct operational responsibility for the entire platform. This approach does not eliminate local SIS variation, but it may reduce the reporting burden that LEA staff described as residing upstream from submission. Knowing which codes apply, reconciling local records, preparing files, correcting errors, aligning school-level entry practices, and interpreting collection changes are all areas where APIs, earlier validation, vendor certification, shared dashboards, and clearer operational guidance could reduce burden even if LEAs retain local SIS choice.

Implementation Timeline

Figure 7. Possible Implementation Timeline, Data Standard with API



Implementation follows a four-year framework to reach steady state. Year 0 focuses on determining the data standard and ensuring it meets CDE's reporting requirements, building capacity across CDE and LEAs through training and knowledge development, setting expectations with local SIS vendors, and determining whether CDE will do the implementation work internally or procure a vendor partner to support it. Year 1 involves planning, designing, and building the receiving infrastructure, and launching an early pilot with a small group of LEAs from one local SIS vendor. Years 2 and 3 expand vendor and LEA onboarding, with state reporting submitted in parallel through both the API and the Data Pipeline. Year 4 marks go-live with API-only submission, retiring the Data Pipeline for SIS collections. From that point, the API framework can be expanded over time to non-SIS systems such as HR and finance. Burden relief begins in Year 4 and will be uneven across LEAs, depending on when each LEA's SIS vendor completes its integration.

Uncertain Timeline Risk

The data standard and API path carries the least predictable implementation timeline. The four-year framework described above represents a reasonable planning horizon, but progress at each stage depends on many factors, including the following:

- **The pace at which CDE can adopt a data standard and build the API infrastructure:** Colorado starts from a different baseline than states with existing API infrastructure—building from the ground up takes longer than modernizing an existing system.
- **The pace at which local SIS vendors build compliant API integrations:** Vendors move at different speeds and for different reasons. A vendor that serves many Colorado LEAs or has already built compliant integrations for other states will move faster.

The result is that burden reduction under this path will be uneven and gradual. LEAs whose vendor complies early will see meaningful change within the four-year framework. LEAs whose vendor is slow may wait considerably longer or may face the decision of whether to change SIS

vendors to access the benefits of the API approach sooner. CDE should communicate about this dynamic from the outset and build flexibility into its implementation planning to account for it.

Analysis

The uncertain timeline is not just an implementation inconvenience—it is a risk that affects LEA planning and CDE budgeting. CDE should set realistic expectations from the outset and treat timeline uncertainty as a risk to manage.

What the Data Standard and API Analysis Does Not Address

The analysis presented in this section focuses on the experience of LEAs submitting SIS data to the state and the infrastructure CDE needs to receive it. There are additional considerations that fall outside that scope but that CDE should account for in any implementation plan.

- CDE will need to build **new capacity** that does not currently exist within the organization. Managing a data standard, governing an API, coordinating vendor onboarding, and maintaining the infrastructure require skills that may be materially different from those required to support the Data Pipeline. CDE should assess its current capacity and plan for any recruitment, retention, and training of staff with the skills this path requires before implementation begins.

Analysis

CDE should assess its current technical capacity before committing itself to a timeline. CDE should also budget for staffing investment.

Critical Dependencies and Risks

The following dependencies and risks apply across the technology solutions described in this report. CDE will need to understand the relevant risks and mitigate as much as possible.

Vendor Risks

- Local SIS vendors may not support the technical solution for state reporting. They may move slowly, build substandard integrations, or exit the market rather than comply with CDE reporting requirements.
- If CDE purchases a common SIS or relies on a vendor solution for the API integration, a single vendor contract creates concentrated dependency—poor vendor performance or substandard integrations have statewide consequences. CDE should set expectations for performance in any RFP.
- Vendor acquisition, dissolution, or market exit can disrupt service. If CDE purchases a common SIS or relies on a vendor solution for the API integration, CDE should require contractual protection in the event this occurs or head off this risk by transitioning vendor tasks to CDE responsibility.

Legislative and Policy Risks

- New or changed collection mandates from the legislature or federal government create risk during system transition. CDE should minimize changes to state reporting during the implementation of the technology solution.
- Colorado's procurement requirements may create contract expiry and rebid risk. CDE should seek to extend the contract end date into the future as much as possible to avoid operational disruption to CDE and LEAs.
- CDE may need to clarify its authority to implement the selected approach. This may require legislative or policy action.

Financial and Funding Risks

- For both solutions, funding sustainability across budget cycles is a risk. CDE should pursue dedicated state appropriations that can be sustained before implementation begins.

- Federal or foundational grants are uncertain and should not be treated as a primary funding source.

CDE Capacity Risks

- CDE staff and technology may not have the capacity or tools for the solution. CDE could rely on a vendor partner in the short term but, long term, should consider building capacity over time.
- Staff turnover at CDE during a multi-year implementation creates institutional knowledge risk. CDE should document implementation rationale and commitments in ways that survive individual staff changes.
- Maintaining the Data Pipeline alongside either technical solution adds ongoing cost and staff burden during the transition period.

LEA Adoption and Transition Risks

- Voluntary common SIS adoption rates may not reach the 50 to 75% threshold needed for financial benefit. CDE should base its costs on realistic adoption rates.
- SIS transitions increase burden before reducing it. CDE should plan for transition periods of one to two years, during which retraining extends beyond Data Managers to all SIS users.
- LEA staff and leadership turnover disrupts continuity across a multi-year implementation. CDE will need to maintain ongoing communication and onboarding.
- Colorado's charter school governance creates implementation complexity. CDE should evaluate how the technical solution could address specific reporting burdens for charter schools.

Data and Infrastructure Risks

- Neither technical solution changes the amount or complexity of data CDE collects. CDE should seek to streamline collections, to reassess what is being collected and why.
- The Data Pipeline runs on aging physical server infrastructure. The longer CDE relies on it as a submission system, the greater the risk of infrastructure failure disrupting state reporting.
- A new technical solution means reconfiguring technology processes and data warehouse connections. CDE should plan for this work.

- By centralizing student data, CDE concentrates breach risk. In other words, a compromise in a single vendor or system could affect all LEAs. CDE should set strict security requirements for the solution and enforce those in any contracts. CDE should also implement independent security reviews to ensure security standards are met. CDE should also communicate with LEAs, keeping them informed of any issues or concerns and setting procedures if there is a security breach.

Timing and Sequencing Risks

- Burden reduction relies on implementing a new technical solution as soon as possible, but the burden of a transition is also real for LEAs. CDE should consider the academic year schedule and competing priorities on LEAs for timing of a solution.
- CDE should consider the timeline for vendor engagement. Engaging vendors too early, without clear specifications, creates confusion. Engaging too late delays implementation.
- The technology landscape is evolving rapidly, and tools that do not exist today may affect future decisions around a technical solution. CDE should monitor emerging technology developments, including the use of artificial intelligence, and factor them into any procurement decisions.

Recommendation

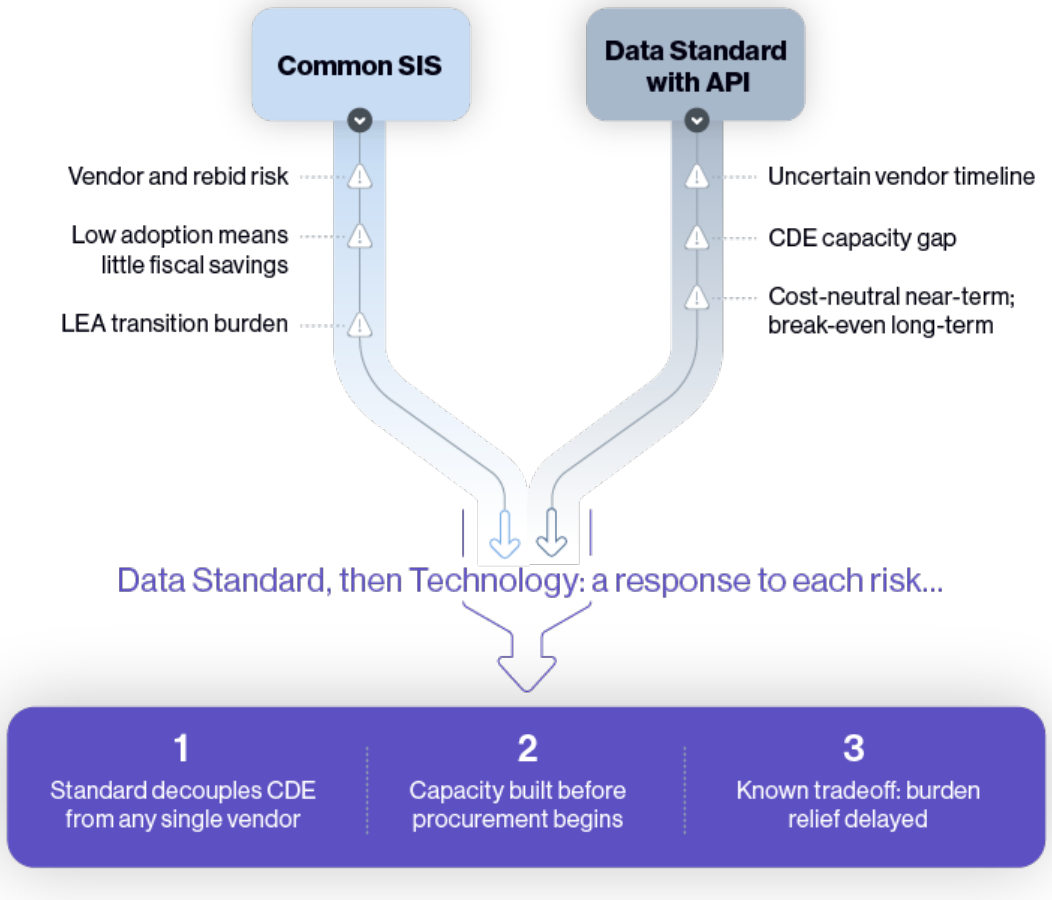
The analyses presented in this report, and in the Level of Effort Analysis and Financial Model reports that inform it, document a system under strain. Colorado's LEAs carry a significant and variable reporting and fiscal burden, the demands for more data from federal and state policy show no signs of slowing, and CDE relies on aging Data Pipeline infrastructure to collect the data that drives consequential decisions.

Both technical solutions discussed above are viable. The assessment findings suggest that the question for CDE is not whether to modernize, but which path best fits Colorado's context, capacity, and priorities. When considering the realities in Colorado and the effort of these technical solutions,

WestEd believes the best solution is for CDE to first implement a data standard and then seek out a technology solution that meets Colorado's state reporting needs.

Figure 8 illustrates why. Each technical solution carries risks that could undermine its success—vendor and rebid risk, uncertain adoption rates, and LEA transition burden for the common SIS; and an uncertain vendor timeline, a CDE capacity gap, and no near-term fiscal savings for the data standard and API approach. Adopting a data standard first responds to each of these: it decouples CDE from any single vendor, builds CDE's capacity before procurement begins, and clarifies infrastructure needs before a contract is signed. The known tradeoff is time. LEAs will not see reporting or fiscal burden reduction until the technology solution is procured and implemented.

Figure 8. Choosing a Path Forward



Regardless of whether CDE pursues the API path, **CDE should evaluate which data standard best fits Colorado and adopt it**. A data standard gives CDE a shared language for data across the agency, one that can be used consistently in conversations with system vendors, in communications with LEAs about data quality, in discussions with legislators about new collection requirements, and across CDE teams that collect data. It provides a framework for evaluating new data requests: does this element exist in the standard, and if not, what does it take to add it? It makes it easier for LEAs to change SIS vendors without disrupting state reporting, because the standard defines what data should be available regardless of which system holds it. And it positions CDE's infrastructure, including the data warehouse, for long-term alignment that should reduce the complexity of future modernization efforts.

CDE should expect a sustained organizational effort to build the knowledge, relationships, and capacity needed to adopt and govern a data standard. Success is not dependent on the technology alone. It is the people, the organization, and the culture that should support and sustain the work. That means building knowledge across CDE and LEAs so staff at every level

understand what the standard is, why it matters, and how it applies to their specific role. It means setting clear expectations with SIS vendors so that the standard defines what is required for state reporting. It means developing relationships with the vendor and national communities that make implementation sustainable over time. And it means putting in place the resources and supports (e.g., training, documentation, data governance practices) that keep organizational knowledge intact as staff turn over. This is a cultural shift as much as a technical one, moving from team-specific definitions and data needs toward a shared understanding of how CDE defines, manages, and communicates data.

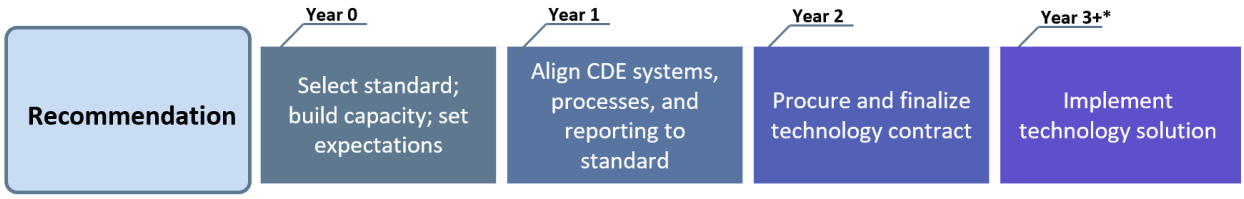
CDE should expect significant technical work to align its systems, infrastructure, and state reporting requirements to the chosen data standard. CDE has the opportunity to work backwards, starting from what it knows it needs to report and mapping how the data it currently collects aligns with the standard. This includes identifying where gaps or definitional differences exist and where in the technology stack the standard should be implemented. This begins with an assessment of where CDE's current systems stand relative to the standard, including the data warehouse, the Data Pipeline, and any adjacent systems that support state reporting. CDE will need to identify which data elements map cleanly to the standard, which require crosswalking or redefinition, and which collection requirements may need to be restructured to align. This assessment will also surface the infrastructure gaps that any technology procurement should address—gaps that are far easier to scope before an RFP is released than after a vendor is under contract. The output of this work is not just a modernized set of data definitions. It is a clear, evidence-based picture of what CDE needs from a technology solution, one that makes the subsequent RFP more precise, competitive, and likely to produce a solution that works for Colorado.

Once the foundational organizational work and technical assessment are complete, CDE can pursue a technology solution built around the data standard. Because the data standard defines what the solution should do and CDE is able to identify the gaps in its infrastructure during the alignment phase, CDE will not be limited to SIS vendors. Any vendor that can receive data aligned with the standard, support LEA submissions, and meet CDE's operational needs could respond. This opens competition beyond traditional SIS vendors and gives CDE more flexibility to find a solution that fits Colorado's context and budget. A common SIS remains a viable response to that RFP, but it is one option among several, including organizations that can help implement an API or solutions that may emerge as the technology landscape evolves. The requirements will be grounded in what CDE learns during the data standard and technical assessment phases, making the procurement more precise, the evaluation more defensible, and the resulting solution more likely to serve Colorado well over the long term.

The primary tradeoff of this approach is time. LEAs will not see reporting or fiscal burden reduction until the technology solution is procured and implemented. The initial phases are estimated at two or more years before a technology RFP would be ready. The Data Pipeline will likely remain operational throughout. The timeline for the full approach is not fully

determinable at the outset, as the scope of the data standard work depends on decisions CDE has not yet made and the technology solution timeline depends on what is ultimately procured. What CDE gains in return is a clearer picture of what it needs, a more precise procurement, and a solution built on a foundation that will serve Colorado well beyond the initial implementation.

Figure 9. Possible Implementation Timeline, Recommendation



*Burden relief begins after year 3, once solution is operational

Implementation begins with foundational work before any technology is procured. Year 0 focuses on determining the data standard and ensuring it meets CDE's reporting requirements, building capacity across CDE and LEAs through training and knowledge development, and setting expectations with local SIS vendors. Year 1 is dedicated to aligning CDE's systems, processes, and state reporting requirements with the chosen standard. Year 2 focuses on procuring, awarding, and finalizing a technology contract. Implementation of the solution begins in Year 3 and continues as needed depending on what is procured. Burden relief begins after the solution is implemented.

If Colorado isolates the data standard from broader tools and downstream analytics, a reasonable planning estimate is approximately $4.0M to $5.0M in one-time implementation costs and approximately $1.5M to $2.0M in ongoing annual operating costs, plus state staffing in the range of 6 to 8 full-time equivalent (FTE) during transition and 4 to 6 FTE in steady state. These estimates include program leadership, governance, and change management; data model reconciliation and reporting redesign; core data infrastructure, hosting, security, and operations; vendor onboarding, certification, and source-system integration; and LEA onboarding, support, and training. It excludes local dashboards, analytical products for LEAs, digital credentials, and broader advanced-analytics ecosystem buildout.

Regardless of whether CDE pursues one of the technical solutions or the recommendation path, CDE has the opportunity now to make that shift.

Other Considerations and Recommendations

There are additional considerations that fall outside the technical solutions that CDE should be aware of as it makes implementation decisions. These considerations do not favor one approach over another—they apply across all paths and should inform CDE's planning regardless of which direction it chooses.

Set Values and Determine Priorities

The analysis in this report makes clear that there is no option that optimizes for every priority simultaneously. A common SIS delivers the strongest near-term reporting and fiscal burden reduction but requires accepting reduced local control. A data standard and API approach preserves local control but demands patience and tolerance for a slower, less predictable implementation. Each path involves tradeoffs, and the right path depends entirely on how CDE weighs those tradeoffs against each other.

To help determine which path to pursue, CDE leadership should identify priorities before any implementation planning begins. That identification should at minimum address the following:

- **Reporting burden versus local control:** These two priorities pull in different directions, and CDE's position on this tension will determine which technical approach is viable. How much weight does CDE give to reducing LEA reporting burden, and how much does it value preserving LEA autonomy?
- **Fiscal savings versus investment:** Is the primary goal to reduce the cost immediately, or is CDE prepared to invest in modernization that pays dividends over a longer horizon? The choice between immediate and long term is a values question.
- **Speed of change versus stability:** How quickly does CDE want LEAs to see reporting burden reduction, and how much operational disruption is acceptable in pursuit of that goal? What other things are being asked from LEAs, and should the rollout consider these demands to avoid inundating LEAs with multiple major changes in the same time period? A faster path requires more disruption; a slower path preserves stability but delays relief.
- **Data quality and governance:** How important is it to CDE that data for state reporting is consistent, well-governed, and of high quality? This priority strengthens the case for a technical approach, but for different reasons and through different mechanisms.

- **Reaching all LEAs versus reaching the right LEAs first:** Does CDE want to prioritize reducing reporting and fiscal burden on the LEAs that carry the greatest reporting load, particularly rural LEAs and those managing data across multiple systems and staff and that have a proportionally high cost? Or should the solution aim to reduce burden consistently across all LEAs regardless of their situation? The answer will shape the technical solution and how implementation is sequenced.
- **Real-time versus periodic data collection:** Does CDE want to move toward a continuous data flow, where data updates more frequently, or is the current model of collections based on a window acceptable? The answer shapes both the technical architecture and the operational expectations CDE sets for LEAs.
- **Returning value to LEAs:** To what extent does CDE want to return value to LEAs through better tools or features like dashboards, early warning systems, and data comparisons? What that value is will differ based on the technical solution, but determining if it is a priority is important.
- **CDE's relationship with vendors:** Does CDE want to be in a relationship with a vendor, with the dependency and stability that entails? Or does CDE prefer an architecture that offers flexibility to change vendors or add new ones over time?
- **All data for state reporting versus only SIS data:** Does CDE want the solution to consider all data being gathered by the LEA, including the SIS, special education, HR, finances, and more? Or should the solution focus primarily on student data found in the SIS?
- **Charter school complexity:** Colorado's charter school governance adds complexity that any technical solution should accommodate. Can CDE or authorizing entities require charter schools to use a particular SIS or would legislative action be needed? Should charter school data flow to CDE through the authorizing entity, or directly from the charter school?

There are no correct answers to these questions. What matters is that CDE answers them deliberately, with input from across the agency and from LEA interest holders, before committing to a technical direction. A technical solution built on unstated or unresolved priorities is a technical solution that will struggle to sustain buy-in from LEAs and operational support over the multi-year horizon that is required.

The decision CDE makes about state reporting infrastructure can also determine whether data systems are designed primarily for compliance and reporting or as tools that support continuous improvement and informed decision-making. The current model treats data as mostly a compliance obligation: LEAs submit, CDE reviews for errors that LEAs should correct, and once resolved, CDE reports data to the federal government, policymakers, and the public. Another approach CDE could pursue is to treat data as a shared resource, one that CDE collects thoughtfully, uses rigorously, and returns to LEAs in forms that support their own operations

and decision-making. That shift would encourage CDE to be a more nimble, responsive agency that prioritizes adapting to the needs of LEAs and policymakers.

Establish Financial and Legal Groundwork

A sustained direction over the multi-year horizon requires important groundwork. CDE should ensure foundational elements are in place before committing to a path. This includes the following:

- **Pursue sustained dedicated funding:** CDE should assess what state appropriations are needed and what is possible given Colorado's current budget environment. Federal grant opportunities, including SLDS competitions, can offset initial costs but should not be treated as a primary funding source. A realistic, multi-year funding plan should be developed.
- **Assess and address contracting requirements:** Colorado's procurement requirements will shape what CDE can do and how. This is especially important as to the maximum length of contract terms, as a contract that expires too quickly creates risk. CDE should engage the Chief Procurement Officer to determine what is possible and pursue the appropriate approvals before soliciting any bids.
- **Clarify legal and policy authority:** CDE should confirm that it has the necessary authority and policy framework in place.

This foundational work is essential. A technical solution that is well-designed but underfunded, poorly contracted, or legally uncertain will not survive long enough to deliver its intended benefits.

Modernize CDE's Data Operations

The path CDE chooses will only be as strong as the internal operations that support it.

Access Internal Capacity

Before committing to a technical approach, CDE should assess its current staffing and technology capabilities. The technical solutions examined in this report place different demands on agency resources, operating models, and technical expertise, which should be considered as part of the decision-making process. Either solution will also require CDE to reassess and potentially modernize components of its technology ecosystem—including the data warehouse, Data Pipeline, and adjacent systems—to understand what changes may be needed on the receiving end regardless of which path is chosen.

Commit to Data Governance Efforts

CDE should establish and sustain a data governance framework that brings consistency, transparency, and shared decision-making to how data are collected, managed, and used across the agency. Effective data governance helps ensure that data collections, definitions, reporting requirements, and business processes are aligned across teams and programs. It provides a structured process for evaluating proposed changes to data collections and reporting requirements, clarifies roles and responsibilities, and promotes shared accountability for data quality and stewardship across the organization. Data governance is not a project with a defined endpoint, nor is it the responsibility of a single office or individual. Rather, it is an ongoing organizational practice that supports coordination and informed decision-making over time. Without a strong governance framework, it will be difficult to fully realize the benefits of any technical solution CDE chooses to implement.

Reevaluate and Streamline Data Collections

CDE should take this opportunity to examine what it collects from LEAs, why it collects it, and whether collections can be simplified without compromising state and federal reporting obligations. This effort will require coordination across programs and a systematic review of existing collection requirements, business processes, and reporting expectations. The result can be a more streamlined and sustainable data collection environment that reduces reporting burden on LEAs and supports the successful implementation of future technology investments. The following are possible principles that can guide that work:

- Collect data once and use it multiple times. Where the same data element is collected through multiple pathways, consolidate.
- Sunset collections that no longer serve an active reporting or policy purpose rather than allowing them to persist by default.
- Keep collections as simple as possible. Where business rules have accumulated, evaluate whether those rules are needed or if they can be moved from collection to a step closer to the use or analysis of the data.
- Collect data at the lowest level of granularity the reporting requirement demands, not at a higher level of specificity than is needed.
- Define data elements consistently before collecting them. Ambiguous definitions produce unreliable data regardless of the technical solution.

Build and Sustain LEA Trust

LEAs need to feel confident that CDE is considering their concerns and preferences. Without LEA confidence and cooperation, adoption will be slow, implementation will be opposed, and the burden reduction this work is intended to deliver will not materialize.

Clear and consistent communication will be an important component of any long-term state reporting strategy. LEAs make ongoing decisions about technology investments, staffing, training, and reporting processes, all of which can be influenced by changes to state reporting requirements. Providing visibility into CDE's direction, even when all implementation details have not yet been finalized, can help LEAs plan more effectively and make informed decisions. As the work progresses, CDE should establish a regular cadence for communicating updates, key decisions, and implementation timelines. This could include a roadmap outlining anticipated priorities, milestones, and areas of future exploration over the next five to ten years, providing LEAs and other interest holders with greater predictability as they plan for the future.

Colorado's LEAs vary widely in size, capacity, and reporting complexity, and CDE's engagement should account for that variation. A small rural LEA managing all state reporting from a single Data Manager has different needs and constraints than a large urban LEA with dedicated IT staff. CDE should be intentional about reaching all LEAs and should tailor its support to reflect the LEA context. The solution CDE pursues should also be designed around what LEAs actually need, requiring ongoing LEA input throughout planning and implementation. CDE should treat LEA feedback as essential information that shapes how the solution is designed and delivered.

Finally, LEA leadership and Data Manager turnover is a constant reality across a multi-year implementation. New staff need to be brought into the roadmap and the rationale behind CDE's decisions as they arrive. CDE should build ongoing communication and onboarding into its engagement strategy to ensure that the people making decisions at LEAs in year three or year five have the same understanding of where CDE is headed and similar opportunities to engage as those who were at the table at the start.

Conclusion

This report is the final deliverable in WestEd's assessment of Colorado's student information and state reporting environment. It builds on the Level of Effort Analysis report, which documented the current reporting burden across Colorado's LEAs, examined four future options for reducing it, and captured feedback from LEAs on these options. It also builds on the Financial Model report, which analyzed the cost implications of various options. Together, these three documents provide CDE leadership, state legislators, and policymakers with the analytical foundation needed to make an informed decision about how to move forward.

The decision is consequential. Colorado's LEAs carry a significant and variable reporting and fiscal burden, and the infrastructure CDE relies on to collect data is aging. The gap between what is possible and what currently exists continues to grow.

The findings from this assessment suggest that establishing a data standard may provide a strong foundation for future modernization efforts. A data standard could support greater consistency in how data are defined and managed across the agency and may improve CDE's ability to evaluate and implement future technology solutions, whether through a common SIS, API framework, or another approach.

Implementing a data standard would require sustained commitment, organizational capacity, and ongoing investment over time. It would also create opportunities for CDE to examine its data collection, reporting, and governance practices and consider how those processes can best support both state reporting needs and local decision-making.

Throughout WestEd's assessment, LEAs emphasized the importance of clear communication regarding future direction and implementation timelines, regardless of what solution is selected. As CDE considers next steps, maintaining interest holder engagement and providing transparency about priorities, decisions, and long-term planning will be important to supporting successful implementation.

Appendix A: LEA Feedback

LEA participants shared their perspectives on the future options—including views on feasibility, potential for burden reduction, and overall support for each approach. The following is a summary of that feedback for the two solutions examined in this report. More information can be found in the Level of Effort Analysis report.

List of Engaged LEAs

CDE required the use of three LEA categories for this assessment, defined as follows:

- *Category 1 (outlying towns or remote areas):* LEAs identified on CDE's list of rural and small rural schools from 2024–2025.[5]
- *Category 3 (Denver metro area):* LEAs identified in CDE's 2025–2026 student enrollment statistics as being in the metro area.[6]
- *Category 2 (urban-suburban or outlying cities):* All other LEAs were placed in Category 2.

These definitions are based on CDE's guidance and are applied consistently throughout this report. Only public districts are included in the definitions.

Table 3 identifies the LEAs that participated in WestEd's assessment, including the number of engagements and whether they attended a feedback session and completed the feedback survey. If the LEA is not listed below, it did not participate.

Table 3. List of Engaged LEAs

LEA Name	Category	Number of Engagements	Attended an LEA Feedback Session	Completed the Feedback Survey
Academy 20	Category 2: Urban/Suburban	2	Yes	
Adams 12 Five Star Schools	Category 3: Denver Metro	1	Yes	

[5] Colorado Department of Education. (2025). *Rural and small rural designation*. https://www.cde.state.co.us/datapipeline/district_rural_status

[6] Colorado Department of Education. (2025). *Pupil Membership Statistics—2025–2026 Pupil Membership.*https://ed.cde.state.co.us/cdereval/pupilmembership-statistics

LEA Name	Category	Number of Engagements	Attended an LEA Feedback Session	Completed the Feedback Survey
Adams-Arapahoe 28J	Category 3: Denver Metro	1	Yes	Yes
Alamosa RE-11J	Category 1: Rural	1	Yes	Yes
Aspen 1	Category 1: Rural	2	Yes	Yes
Bayfield 10 Jt-R	Category 1: Rural	2	Yes	
Big Sandy 100J	Category 1: Small Rural	1		
Boulder Valley Re 2	Category 3: Denver Metro	2	Yes	Yes
Branson Reorganized 82	Category 1: Small Rural	1		
Brush RE-2(J)	Category 1: Rural	3	Yes	
Buena Vista R-31	Category 1: Small Rural	2		
Campo RE-6	Category 1: Small Rural	2	Yes	Yes
Centennial BOCES	NA	3	Yes	
Charter School Institute	NA	3	Yes	Yes
Cherry Creek 5	Category 3: Denver Metro	2	Yes	Yes
Clear Creek RE-1	Category 1: Small Rural	2		
Colorado School for the Deaf and Blind	NA	2	Yes	Yes
Colorado Springs 11	Category 2: Urban/Suburban	2	Yes	Yes
Creede School District	Category 1: Small Rural	1		
Custer County School District C-1	Category 1: Small Rural	1	Yes	Yes
De Beque 49JT	Category 1: Small Rural	1	Yes	Yes
Delta County 50(J)	Category 1: Rural	2	Yes	Yes
Denver County 1	Category 3: Denver Metro	3	Yes	Yes
District 49	Category 2: Urban/Suburban	3	Yes	Yes

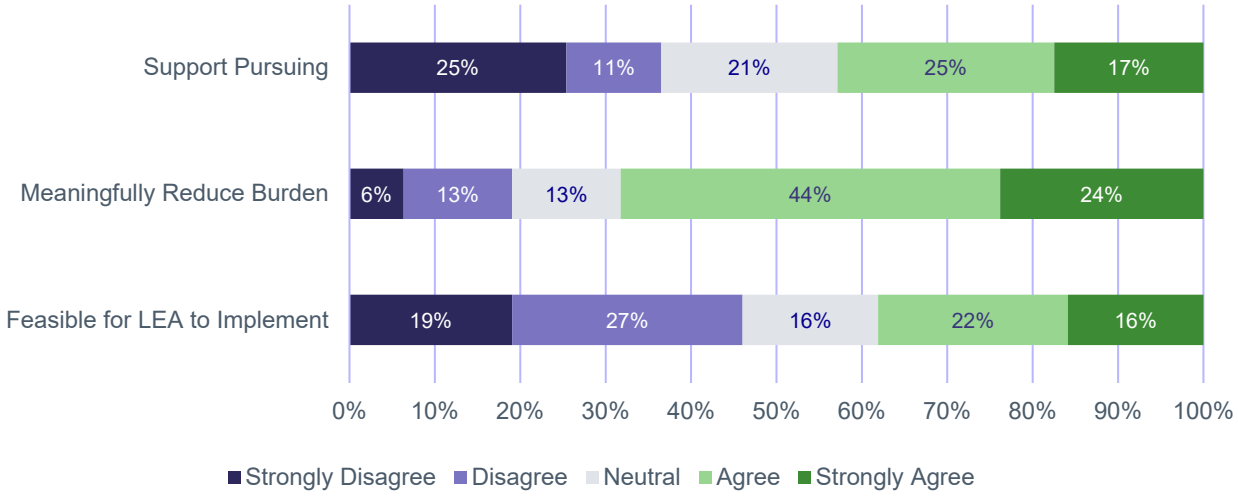
LEA Name	Category	Number of Engagements	Attended an LEA Feedback Session	Completed the Feedback Survey
Douglas County Re 1	Category 3: Denver Metro	1	Yes	Yes
Durango 9-R	Category 1: Rural	2	Yes	Yes
Eagle County RE 50	Category 1: Rural	2	Yes	Yes
East Central BOCES	NA	1	Yes	
East Otero R-1	Category 1: Rural	1	Yes	Yes
Elizabeth School District	Category 1: Rural	2	Yes	Yes
Englewood 1	Category 3: Denver Metro	1	Yes	
Estes Park R-3	Category 1: Small Rural	3	Yes	Yes
Fort Morgan Re-3	Category 1: Rural	2	Yes	Yes
Fowler R-4J	Category 1: Small Rural	1		
Garfield Re-2	Category 1: Rural	2	Yes	Yes
Greeley 6	Category 2: Urban/Suburban	2	Yes	Yes
Gunnison Watershed RE1J	Category 1: Rural	1	Yes	
Harrison 2	Category 2: Urban/Suburban	2	Yes	Yes
Huerfano Re-1	Category 1: Small Rural	2	Yes	Yes
Ignacio 11 JT	Category 1: Small Rural	1		
Jefferson County R-1	Category 3: Denver Metro	3	Yes	Yes
Johnstown-Milliken RE-5J	Category 1: Rural	1		
Kiowa C-2	Category 1: Small Rural	1		
Las Animas RE-1	Category 1: Small Rural	2	Yes	Yes
Littleton 6	Category 3: Denver Metro	3	Yes	
Manitou Springs 14	Category 2: Urban/Suburban	2	Yes	Yes

LEA Name	Category	Number of Engagements	Attended an LEA Feedback Session	Completed the Feedback Survey
Manzanola 3J	Category 1: Small Rural	1		
Mapleton 1	Category 3: Denver Metro	1	Yes	
Meeker RE-1	Category 1: Small Rural	3	Yes	
Mesa County Valley 51	Category 2: Urban/Suburban	2	Yes	Yes
Moffat 2	Category 1: Small Rural	1		
Monte Vista C-8	Category 1: Small Rural	1		
Montezuma-Cortez RE-1	Category 1: Rural	2	Yes	Yes
Montrose County RE-1J	Category 1: Rural	3	Yes	Yes
Mountain BOCES	NA	2		
North Conejos RE-1J	Category 1: Small Rural	1		
North Park R-1	Category 1: Small Rural	2	Yes	Yes
Northeast BOCES	NA	1	Yes	Yes
Ouray R-1	Category 1: Small Rural	1		
Park County RE-2	Category 1: Small Rural	1		
Pikes Peak BOCES	NA	1		
Platte Valley RE-7	Category 1: Rural	2	Yes	
Poudre R-1	Category 2: Urban/Suburban	3	Yes	Yes
Primero Reorganized 2	Category 1: Small Rural	1		
Pueblo City 60	Category 2: Urban/Suburban	3	Yes	Yes
Pueblo County 70	Category 2: Urban/Suburban	2	Yes	Yes
Roaring Fork RE-1	Category 1: Rural	1		Yes
San Juan BOCES	NA	2	Yes	Yes

LEA Name	Category	Number of Engagements	Attended an LEA Feedback Session	Completed the Feedback Survey
San Luis Valley BOCES	NA	1	Yes	Yes
Santa Fe Trail BOCES	NA	1		
Sargent RE-33J	Category 1: Small Rural	2		
School District 27J	Category 3: Denver Metro	2	Yes	Yes
St Vrain Valley RE1J	Category 3: Denver Metro	2		
Steamboat Springs RE-2	Category 1: Rural	2	Yes	Yes
Summit RE-1	Category 1: Rural	1	Yes	
Telluride R-1	Category 1: Small Rural	1	Yes	
Thompson R2-J	Category 2: Urban/Suburban	3	Yes	Yes
Trinidad 1	Category 1: Small Rural	2	Yes	
Valley RE-1	Category 1: Rural	3	Yes	Yes
Vilas RE-5	Category 1: Small Rural	1	Yes	
Walsh RE-1	Category 1: Small Rural	1		
Weld County RE-1	Category 1: Rural	1	Yes	Yes
Weld RE-4	Category 2: Urban/Suburban	2	Yes	Yes
Weld Re-8 Schools	Category 1: Rural	2	Yes	Yes
West Grand 1-JT	Category 1: Small Rural	1		
Westminster Public Schools	Category 3: Denver Metro	2	Yes	
Widefield 3	Category 2: Urban/Suburban	2	Yes	Yes
Wiley RE-13 Jt	Category 1: Small Rural	1		
Wray RD-2	Category 1: Small Rural	2	Yes	Yes
Yuma 1	Category 1: Small Rural	1		

Common SIS

Figure 10. LEA Participants' Opinions on Common SIS



Statement	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
Support Pursuing	25%	11%	21%	25%	17%
Meaningfully Reduce Burden	6%	13%	13%	44%	24%
Feasible for LEA to Implement	19%	27%	16%	22%	16%

When asked which pros and cons are the most significant, participants indicated the following:

Pros

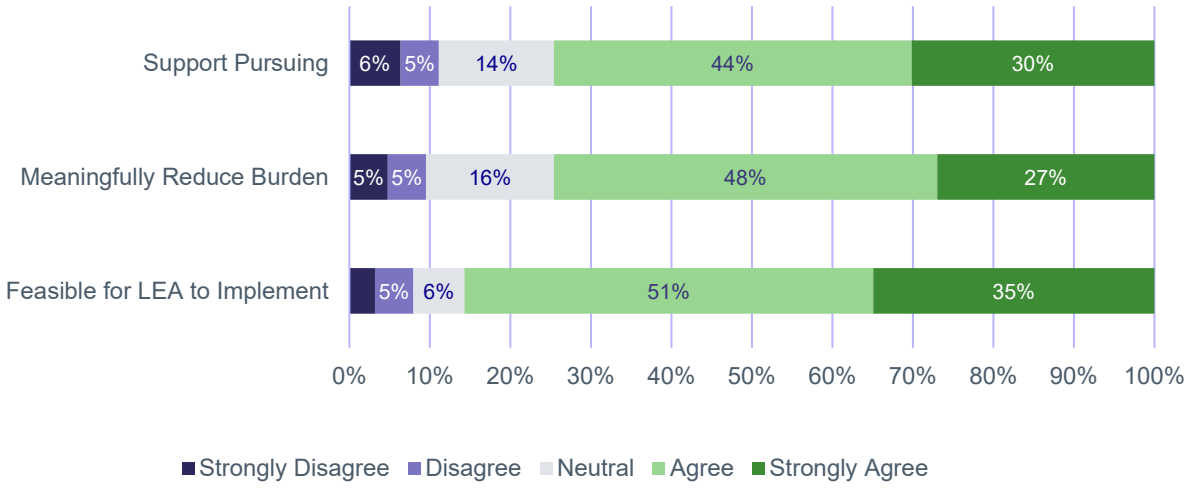
- ✓ Biggest long-term burden reduction (30%)
- ✓ Lower SIS licensing costs (19%)
- ✓ Potential for improved data quality (19%)
- ✓ Seamless transfer of data between LEAs (14%)

Cons

- – SIS transitions are difficult (51%)
- – Transition period will be difficult (11%)
- – Multi-year, sustained costs (9.5%)
- – Local control resistance (9.5%)
- – Risk of single vendor contract (9.5%)

Data Standard and API

Figure 11. LEA Participants' Opinions on Data Standard and API



Statement	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
Support Pursuing	6%	5%	14%	44%	30%
Meaningfully Reduce Burden	5%	5%	16%	48%	27%
Feasible for LEA to Implement	3%	5%	6%	51%	35%

When asked which pros and cons are the most significant, participants indicated the following:

Pros

- ✓ Potential for burden reduction (33%)
- ✓ Foundation for broader integrations (30%)
- ✓ Preserves local SIS choice (27%)

Cons

- – Relies on local SIS vendors (38%)
- – Slowest and least predictable (21%)
- – Requires new technical skills (11%)
- – Implementation may be difficult (11%)

Figure 12. LEA Participant Option Rankings

Option	4th Choice	3rd Choice	2nd Choice	1st Choice
Option 1: Common SIS	32%	22%	16%	30%
Option 2: Enhance or Overhaul Data Pipeline	38%	35%	21%	6%
Option 3: Vendor Solution	21%	33%	40%	6%
Option 4: Data Standard and API	10%	11%	22%	57%

