

Reporting Requirements Study

Utah State Board of Education

Report to the Utah State Legislature Education Interim Committee
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Reporting Requirements Study

Executive Summary

Utah Code [§ 53E-3-526](#) required that the Utah State Board of Education (USBE) examine reporting requirements in education and compile a report. Through the process of this study, a catalog of all Local Education Agency (LEA) and USBE reports was created.

Key Findings

- In Utah, all districts must complete 63 reporting requirements and all charter schools must complete 56 reporting requirements.
- In addition to mandatory reporting, there are many programs or grants that can potentially add an additional 110 reporting requirements.
- Although grants and some programs are elective, LEAs often participate to receive essential funding needed to drive educational outcomes, rendering elective reporting requirements effectively mandatory.
- USBE must complete 276 reporting requirements. This takes an estimated 99,029.5 hours to complete which is the equivalent of 47.5 full time employees.

Recommendations

The findings from this study have informed the following recommendations.

Recommendations for the Legislature

#1 That the Legislature explicitly incorporate LEA administrative burden into each bill's fiscal note or an appropriate section

#2 That the Legislature allocate \$200,000 of on-going funding for USBE to procure a dynamic software solution, transitioning the reporting requirement catalog from a static spreadsheet into an accessible, interactive platform

Recommendations for both the Legislature and USBE

#3 That the Legislature and USBE adopt a standardized evaluation matrix to assess reporting requirements during legislative drafting, rule making, periodic reviews, and report elimination decisions

Recommendations for USBE

#4 That the USBE adopt policies and procedures to standardize the reporting requirement collection process

#5 That the USBE establish an 18-month standard implementation timeline for new data collections

Introduction

Utah Code [§ 53E-3-526](#) requires that the Utah State Board of Education (USBE) examine reporting in education and present a study. To assess existing reporting requirements, a complete catalog of reporting requirements for Local Education Agencies (LEAs) and USBE has been created. Additionally, the study examined recommendations for evaluating, tracking and reviewing reporting requirements.

The Data System and Reporting Advisory Committee

In accordance with Utah Code [§ 53E-3-526](#) and under the guidance of USBE Board leadership, the Data Systems and Reporting Advisory Committee was formed with a variety of required stakeholders. Members were selected based on their relevant experience and to ensure varied representation. The committee was finalized at the end of May 2025 and will meet regularly until September 2026.

This committee advised on the study, methodology and recommendations. They provided critical insight into LEA experiences. See [Appendix A](#) for more information.

Definition of Terms

Reporting Requirement

As used throughout this study, the term “reporting requirement” will refer to any data or information that an LEA is required to submit to USBE, the state legislature, or the federal government. This will also refer to any data or information that USBE is required to submit to the state legislature or the federal government. This includes reports, grant applications, goals, assurances, forms, or surveys. This also includes Student Information System (SIS) submissions through the Utah Schools Information Management System (USIMS) or Utah eTranscript and Record Exchange (UTREx).

What is a reporting requirement?



Administrative Burden

The term “administrative burden” is used throughout the report to refer to the effort expended on reporting requirements. Administrative burden was approximated by using two self-reported factors: time spent completing or facilitating the reporting requirement and frustration level experienced during the reporting requirement.

Methodology

Reporting Requirement Catalog

The reporting requirement catalog was created through a four-stage process.

Stage 1: Internal USBE Staff Interviews

Interviews were conducted with 21 USBE staff across various sections, including School Safety, Purchasing, and Educator Licensing. After receiving a brief study overview and catalog outline, participants provided feedback on what data would make the catalog most useful for themselves and their stakeholders.

Stage 2: Stakeholder Feedback

Feedback was gathered from the Data Systems and Reporting Advisory Committee and the Administration and Transparency Taskforce. These groups represent a broad range of education stakeholders, including USBE board members, legislators, superintendents, principals, district and charter administrators, and USBE staff. After reviewing a sample catalog, members provided input on the features and information necessary to maximize utility for LEAs and external stakeholders.

Stage 3: Pilot Test

USBE coordinators from one USBE section—who work closely with specific reporting requirements—conducted a walk-through of the catalog. They provided feedback on the user experience of inputting data.

Stage 4: Data Entry & Catalog Finalization

Meetings were held with each USBE section to input all reporting requirements into the catalog. Each requirement was then reviewed and coded for analysis.

Administrative Burden

This study's measure of administrative burden was adapted from Jilke et al. (2024), which established that brief surveys tracking time spent and frustration levels yield results as accurate as longer, more complex measurement tools.

Submitting Burden

Staff at LEAs and USBE who submit reporting requirements estimated their time spent collecting, compiling, and submitting data. They also rated their frustration level on a scale from *"Not Frustrated at All"* to *"Extremely Frustrated."*

Facilitation Burden

USBE staff who manage reporting requirements estimated the time spent facilitating them—including requirement preparation, LEA support, data validation, and result analysis—along with their frustration levels on a scale from *"Not Frustrated at All"* to *"Extremely Frustrated."*

Data Collection Process for Administrative Burden

As a part of completing the reporting requirement catalog, over 104 USBE staff completed time and frustration evaluations for each reporting requirement they added to the catalog.

LEA-level administrative burden feedback was gathered through referrals from members of the Data Systems and Reporting Advisory Committee, USBE Board members, and members of the Administration and Transparency Taskforce at USBE. Twelve LEAs (five charter schools and seven school districts of varying sizes) provided administrative burden feedback. Whenever feasible, feedback for a given requirement was gathered from a charter school, a small, or medium district, and a large district, with their responses averaged. While not all reporting requirements were evaluated, this effort delivers unprecedented visibility into reporting obligations in Utah.

Administrative Burden Estimates from Over 104 USBE staff 5 Charter Schools 7 School Districts

Administrative Burden Limitations

Although staff do not formally track hours by reporting requirement, these self-reported estimates from staff directly responsible represent the most accurate data available. Respondents noted that time estimates were particularly difficult to pinpoint because of complex, collaborative, or annually fluctuating reporting requirements. One example of this type of reporting requirement is the Notification of Alleged Educator Misconduct which must be submitted by an LEA if an educator

has violated or is alleged to have violated the educator standards. This must also be submitted if there are parent allegations or an educator has been charged with a crime. This number could fluctuate significantly for LEAs depending on the circumstances of a given year.

Additionally, reporting requirements demand more time during staff onboarding or following policy revisions—such as a USBE staff member redesigning a collection form following new legislation or an LEA training a new Child Nutrition Director. While these factors can create temporary outliers, they represent common operational realities experienced across USBE and all LEAs.

LEAs submitted feedback for most reporting requirements from all USBE sections, except Financial Operations, Career and Technical Education, Special Education or School LAND trust.

Reporting Requirement Catalog

USBE subject matter experts provided the information to compile a catalog of all LEA and USBE reporting requirements. It is currently housed in a spreadsheet. While partial catalogs documenting specific categories of LEA requirements have been created in the past, no catalog this thorough has ever been compiled or maintained.

What is Included in the Reporting Requirement Catalog?

USBE staff were asked to include the following information for each reporting requirement:

- **Submitting Entity:** The organization submitting the report (*e.g., USBE, LEA*)
- **Submitting Role:** The specific role responsible for submission (*e.g., superintendent, administrative staff, LEA school safety and security specialists, teachers*)

- **Receiving Entity:** The recipient of the report (*e.g., USBE, state legislature, federal government*)
- **USBE Point of Contact:** The email address for the primary contact person at USBE
- **USBE Section:** The USBE section primarily responsible for the reporting requirement
- **Legislative Basis:** The associated USBE administrative rule, state code, or federal code
- **Sunset Provision:** Information on whether a sunset provision applies and its expiration date
- **Summary:** A brief description of the reporting requirement
- **Report Type:** The format category (*e.g., website posting, plan, application, assurance, data submission, survey, report, policy, agreement, document, goal*)
- **Data Elements:** A description of the data required
- **Funding Impact:** An indication of whether funding is tied to the reporting requirement
- **Submission Method:** The system or method used to submit (*e.g., Utah Grants, USIMS/UTREx, Assurances, Websites, Google Form, Qualtrics, Email*)
- **Submission Link:** The link used to submit the report, if applicable
- **Additional Resources Link:** A link to supplementary online information, if available
- **Submission Frequency:** How often the reporting requirement must be submitted
- **Submission Deadline:** The date the reporting requirement is due
- **Grant Association:** An indication of whether the reporting requirement is tied to a grant
- **Applicable LEAs:** The target group required to complete the report (*e.g., all LEAs, program participants, elementary schools, charter schools*)

Although staff were asked to provide complete details for each reporting requirement, some entries remain incomplete. For instance, an analysis of 58 reporting requirements might show 31 tied to funding and 25 not, leaving two unaccounted for. These gaps occur either because staff omitted the information or left explanatory comments detailing nuances that prevented simple categorization.

Current Reporting Requirement Catalog

The creation of the reporting requirement catalog fulfills a key 2019 recommendation from the Office of the Legislative Auditor General (OLAG) to create a centralized list for data collection. While currently maintained as a spreadsheet, the catalog provides immediate value, but also highlights clear operational constraints.

Strategic Benefits of the Catalog

Internal USBE Transparency & Collaboration

Historically, USBE departments managed reporting requirements in silos—leading to occasional duplicate requests and overlapping deadlines (Office of the Legislative Auditor General, State of Utah, 2019) .

USBE staff can now identify some similar data element requests across departments. USBE staff can also cross-reference catalog deadlines to prevent new due dates from clashing with existing deadlines.

Cross-Agency Transparency

LEAs, policymakers, state agencies, and other education stakeholders can see all reporting requirements and their related information.

For example this catalog allows school administrators to find direct USBE contacts, superintendents to track submission deadlines, state legislators to review legislatively mandated reports, and the public to see reporting obligations tied to grant programs.

Streamlined Source of Truth

A centralized catalog replaces fragmented communication channels.

USBE staff currently communicate support or information to LEAs through various channels including emails and USBE website changes with support or information for LEAs. A public-facing catalog will provide one clear place where LEA staff can

look for information and where USBE can go to update information, saving time for both.

This also improves knowledge transfers for USBE and LEA turnover. For example a new Human Resource Director can filter for all position-specific reporting requirements and learn up-to-date information about them.

Constraints of the Current Spreadsheet Format

While the catalog exists, its current spreadsheet format imposes significant limitations that hinder full adoption and maximum benefits.

Stakeholder Navigation Challenges

As a spreadsheet, the catalog may be difficult to navigate for stakeholders, diminishing utility. In its current form, basic filtering is possible, but cumbersome. Stakeholders would need a level of spreadsheet proficiency which some, but not all have. Other possibilities like personalized calendar views, interactive dashboards, example reports, or paragraphs of text are not practical within the spreadsheet format.

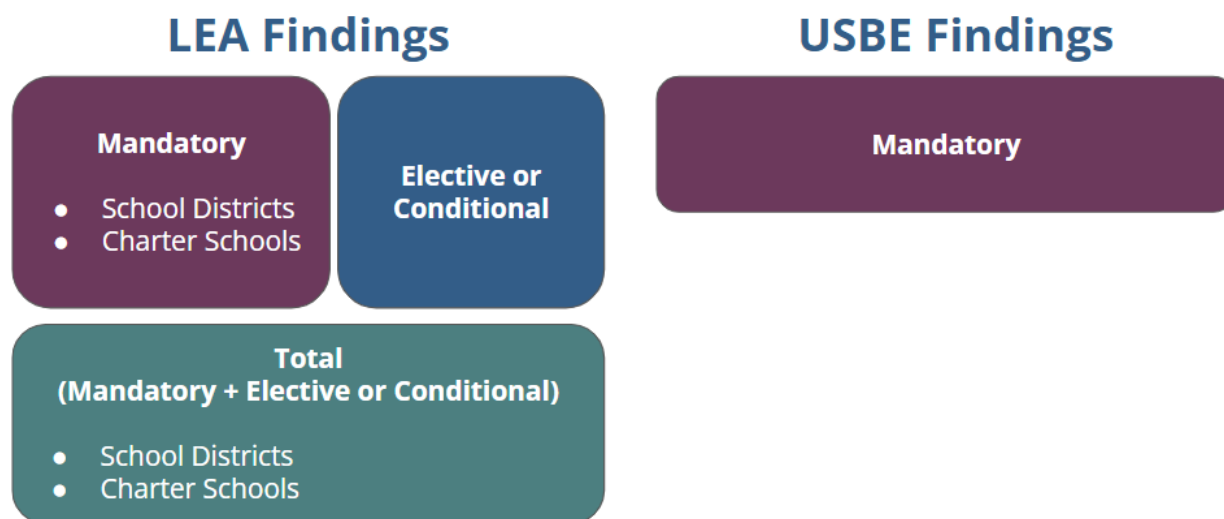
USBE Workflow Challenges

If the catalog remains a static spreadsheet, it risks being disconnected from standard USBE workflows, which could quickly render its data obsolete. Maintaining accurate information requires ongoing updates to reflect legislative mandates, internal decisions, and funding shifts. The history of this project highlights this challenge: a reporting catalog created three years ago at the request of the Administration and Transparency Taskforce (then the Reporting Requirements Taskforce) quickly became outdated because there was no regular maintenance. Without an intuitive, accessible platform, lack of staff buy-in or difficulty could cause this current effort to similarly become obsolete.

Study Findings

Using the information gathered from the reporting requirements catalog, the following findings have been compiled.

The study findings begin with LEA findings, starting with mandatory reporting requirements for school districts and charter schools, followed by elective or conditional requirements. Next, it presents the combined totals for both mandatory and elective/conditional findings, broken down first by school district and then by charter school. Finally, the study details the USBE findings for mandatory reporting requirements. These lists include only what USBE staff indicated that districts and charter schools must complete.



LEA Mandatory Reporting Requirement Findings

Mandatory District Reporting Requirements

The following information includes what USBE staff indicated that all districts must complete.

Note: Counts may not sum to the total due to missing data or nuanced responses that could not be categorized.

Number of Reporting Requirements

63

11 of these mandatory reporting requirements are only required for districts and not charter schools.

63 mandatory district reporting requirements

USB E Sections

The USB E sections primarily responsible for these reporting requirements are Financial Operations (12), Special Education (10), and Student Services (9).

Legislative Basis

Reporting requirements are established through federal code, state code and USB E administrative rule—frequently through a combination¹.

Mandatory district reporting requirements that are governed by each combination of federal code, state code and/or USB E administrative rule:

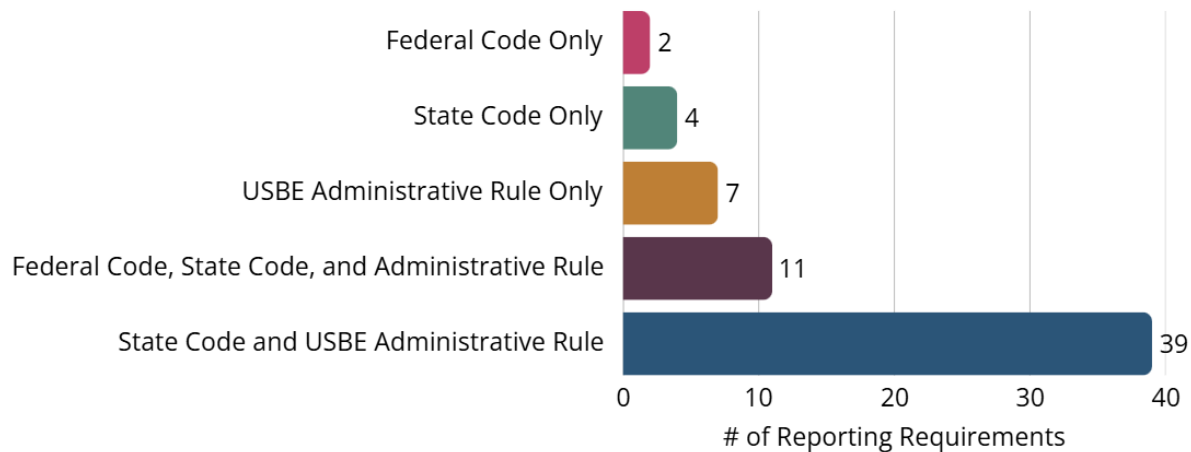
- Federal Code Only: 2
- State Code Only: 4
- USB E Administrative Rule Only: 7
- Federal Code, State Code, and Administrative Rule: 11
- State Code and USB E Administrative Rule: 39

¹ For example, when the state legislature passes a law that requires LEAs to submit information like the Emergency Safety Intervention (ESI) data, USB E adds the requirement into USB E administrative rule often with additional specificity for LEAs.

Altogether there are 13 mandatory district reporting requirements in federal code, 54 in state code and 57 in USBE administrative rule.

Legislative Basis

District Mandatory Reporting Requirements

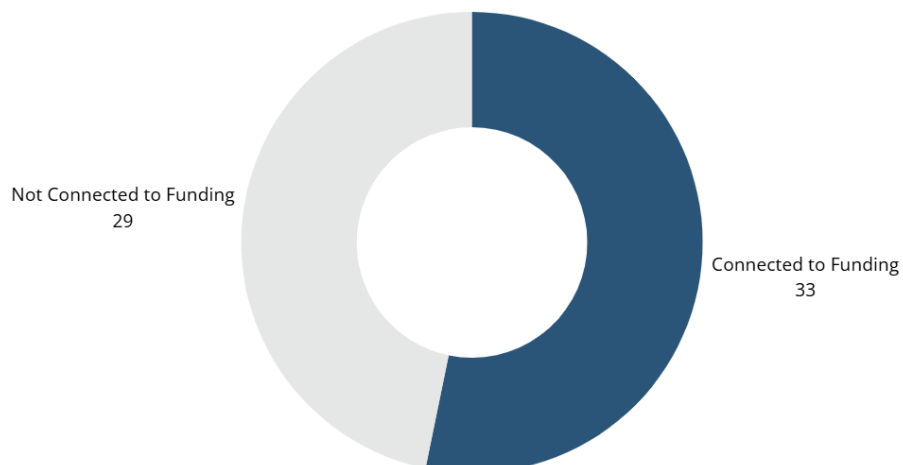


Funding Impact

USBE staff were asked whether there was funding attached to each reporting requirement. This funding could include funds provided based on the data in a reporting requirement or funds withheld if a reporting requirement is not submitted. 33 mandatory district reporting requirements are connected to funds, 29 are not.

Funding Impact

Mandatory District Reporting Requirements



Submission Frequency

Daily²: 1

Monthly: 2

Annually: 43

Every 2 years: 2

Every 3 years: 1

Other: 5

As Needed³: 9

Submission Method

There are 11 methods that districts use to submit mandatory reporting requirements.

Qualtrics Form: 20

Email: 13

Utah Schools Information Management System (USIMS) / Utah eTranscript and Record Exchange (UTREx) : 7

Websites⁴: 6

Utah Program Improvement Planning System for Special Education (UPIPS): 6

² The daily submission is the submission of data from LEA student information systems (SIS) to USBE through UTREx.

³ An example of a reporting requirement that is submitted “As Needed” is Sensitive Materials Challenges where an LEA submits information to the USBE about the final determination regarding a sensitive material allegation and the challenged instructional material.

⁴ This includes the Utah Cyber Center’s website, USBE’s School Land Trust website and the Department of Education’s website for the Civil Rights Data Collection (CRDC).

Other submission methods include: Google Forms, Utah Grants, the Utah Post School Outcomes Survey (UPSOS), FastField, Progress, MOVEit, and Transition from Early Intervention Data Information (TEDI)

LEA Administrative Burden

LEA staff⁵ provided administrative burden feedback on a sample of mandatory district reporting requirements, submitting responses for 30 of the 62 reporting requirements. Where multiple LEAs provided feedback on the same requirement, their responses were averaged.

Time Spent

LEA staff estimated their time spent on each reporting requirement in gathering information and submitting.

LEA staff dedicate approximately **4,211** hours per LEA on the 30 reporting requirements for which LEA staff responded. This is the equivalent of just over 2 full-time employees to complete about half of the total reporting requirements.

4,211 hours per LEA
for half of the mandatory
district reporting
requirements

⁵ The term LEA is used here because this section combines data from district and charter school responses.

Frustration Level

LEA staff were also asked to describe how frustrated they felt while completing the reporting requirement.

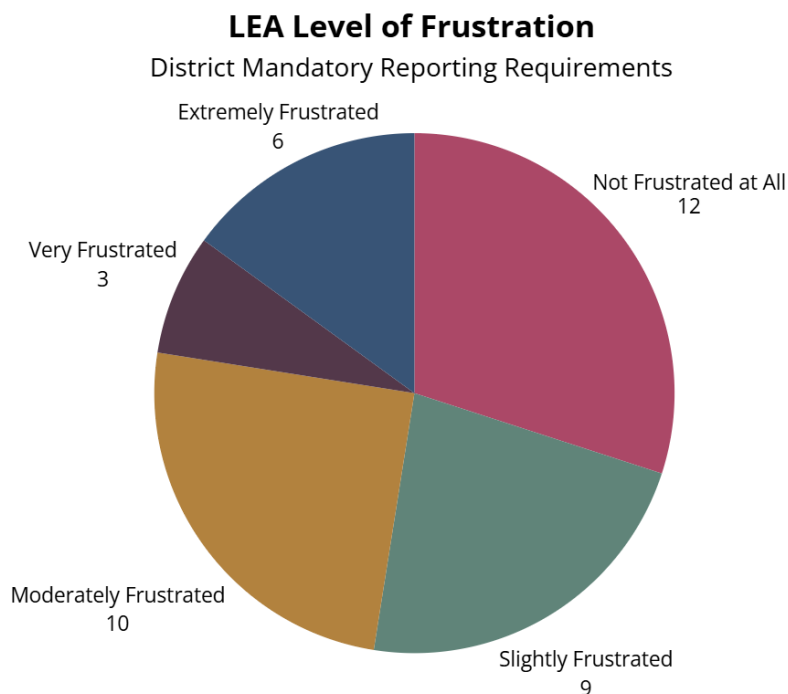
Not Frustrated at All: 12

Slightly Frustrated: 9

Moderately Frustrated: 10

Very Frustrated: 3

Extremely Frustrated⁶: 6



USBE Administrative Burden

Time Spent

USBE staff estimated their time spent on each mandatory district reporting requirement across four activities: preparation, LEA support and communication, data validation, and results analysis.

Combined together, staff dedicate approximately 41,049.5 hours on these reporting requirements, which is the equivalent of almost 20 full-time employees.

⁶ One extremely frustrated LEA staff member mentioned that they no longer receive funding for the reporting requirement, but are still required to submit. Although they collect the required information internally, USBE requires them to submit it in a different way, adding to their frustration.

41,049.5 hours of USBE time for 63 mandatory district reporting requirements

Frustration Level

USBE staff were also asked to describe how frustrated they felt during the facilitation of the reporting requirement.

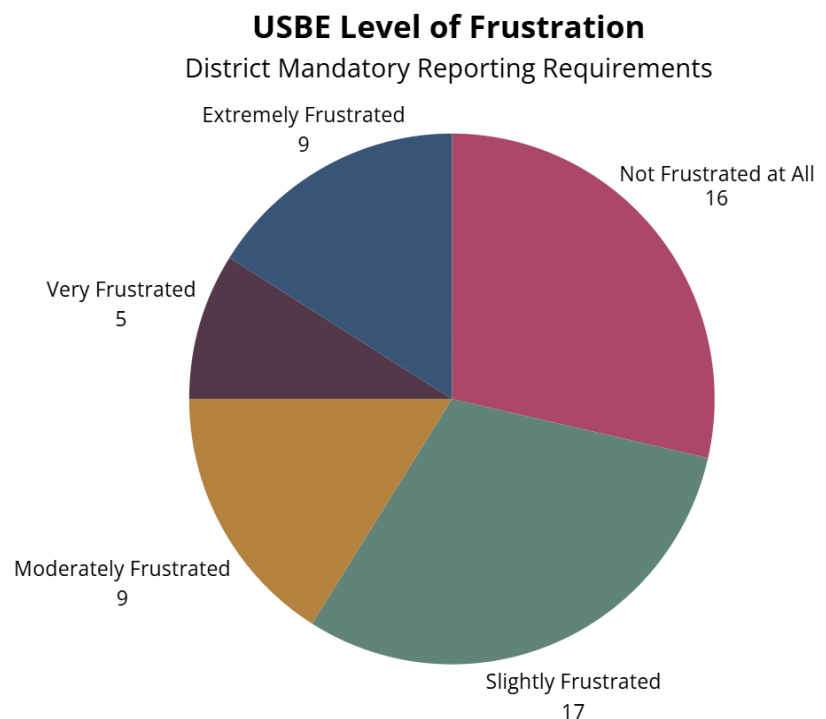
Not Frustrated at All: 16

Slightly Frustrated: 17

Moderately Frustrated: 9

Very Frustrated: 5

Extremely Frustrated⁷: 9



USBE Staff

Recommendations

When compiling information for this reporting requirements catalog, USBE staff were asked if they had any recommendations for changes to the reporting requirements. USBE staff replied with many responses that have been sorted into

⁷ One extremely frustrated USBE staff member shared that a strict state code timeline forced USBE to implement a temporary Qualtrics workaround for a new reporting requirement while simultaneously building the permanent UTREx/USIMS solution. This overlapping workflow has doubled the workload for both USBE and LEA staff, who must now learn and provide feedback on two systems at once.

the following categories. More details and examples related to these recommendations can be found in [Appendix B](#).

Specific Change: 9

These are recommendations that staff provided that include specific changes to the reporting requirement.

Elimination, Consolidation, or Reduction: 9

These USBE staff recommendations focused on eliminating, consolidating, or streamlining a reporting requirement.

More USBE Action Based on Reporting Requirement Results: 4

These are recommendations that USBE staff take more action either in compliance monitoring, consequences, or in support based on insights from data gathered.

USBE is Currently Improving: 3

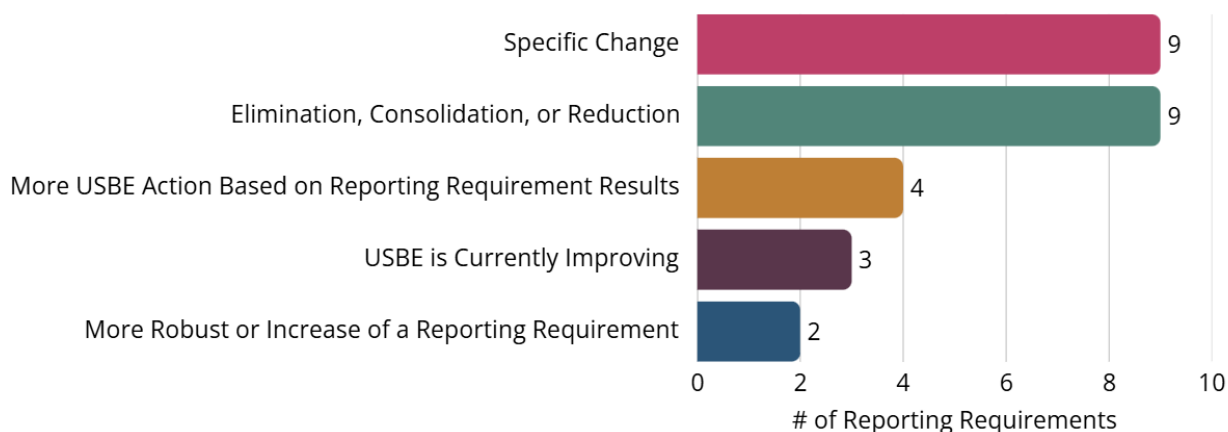
These are comments where staff mentioned that they are currently working on improving the reporting requirement.

More Robust or Increase of a Reporting Requirement: 2

These are recommendations that data elements are added to a reporting requirement.

USBE Staff Recommendations

District Mandatory Reporting Requirements



Mandatory Charter School Reporting Requirements

The following information includes what USBE staff indicated that all charter schools must complete.

Note: Counts may not sum to the total due to missing data or nuanced responses that could not be categorized.

Number of Reporting Requirements

56

There are 4 mandatory reporting requirements that are only required for charter schools and not districts.

56 mandatory charter school reporting requirements

USBE Sections

The USBE sections primarily responsible for these reporting requirements are Student Services (9), Special Education (7), Financial Operations (7), and Student Data Privacy (5).

Legislative Basis

Reporting requirements are established through federal code, state code and USBE administrative rule—frequently through a combination¹.

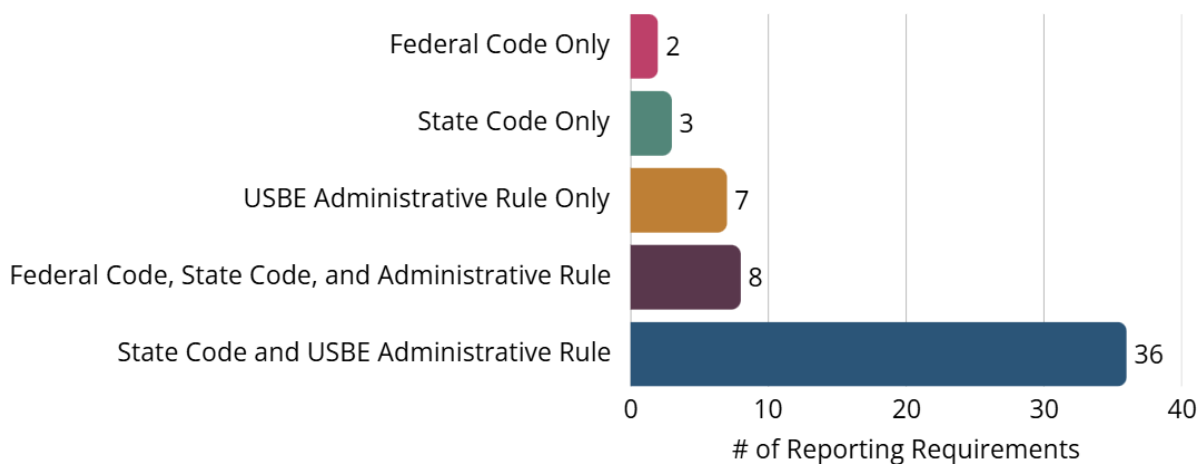
Mandatory charter school reporting requirements that are governed by each combination of federal code, state code and/or USBE administrative rule:

- Federal Code Only: 2
- State Code Only: 3
- USBE Administrative Rule Only: 7
- Federal Code, State Code and Administrative Rule: 8
- State Code and USBE Administrative Rule: 36

Altogether there are 11 mandatory charter school reporting requirements in federal code, 48 in state code, and 52 in USBE administrative rule.

Legislative Basis

Charter School Mandatory Reporting Requirements

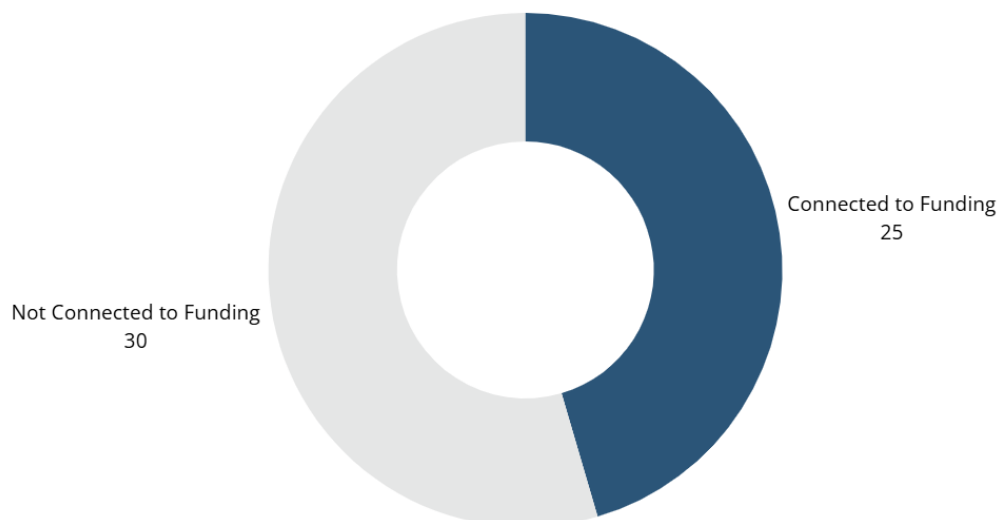


Funding Impact

USBE staff were asked whether there was funding attached to each reporting requirement. This funding could include funds given based on the data in a reporting requirement or funds withheld if a reporting requirement is not submitted. 25 mandatory charter school reporting requirements are connected to funds, 30 are not.

Funding Impact

Mandatory Charter School Reporting Requirements



Submission Frequency

Daily²: 1

Monthly: 1

Annually: 36

Every 2 years: 2

Every 3 years: 1

Every 5 years: 1

Other: 5

As Needed³: 9

The submission every 5 years is a State Charter School Board (SCSB) comprehensive review.

Submission Methods

There are 11 methods that charter schools use to submit mandatory reporting requirements.

Qualtrics Form: 20

Email: 8

Utah Schools Information Management System (USIMS) / Utah eTranscript and Record Exchange (UTREx): 7

Websites⁴: 6

Other submissions include: PrimeroEdge, Utah Program Improvement Planning System for Special Education (UPIPS), Progress MOVEit, FastField, Utah Post School Outcomes Survey (UPSOS), Utah Grants, Google Forms, and School Site Visit.

The school site visit is a portion of the SCSB Comprehensive Review.

LEA Administrative Burden

LEA staff⁵ provided administrative burden feedback on a sample of mandatory charter school reporting requirements, submitting responses for 31 of the 56

reporting requirements. Where multiple LEAs provided feedback on the same requirement, their responses were averaged.

Time Spent

LEA staff estimated their time spent on each reporting requirement in gathering information and submitting.

LEA staff dedicate approximately **4,041 hours** on these reporting requirements which is the equivalent of 2 full-time employees to complete just over half of the total reporting requirements.

**4,041 hours per LEA
for 55% of the mandatory
charter school reporting
requirements**

Frustration Level

LEA staff were also asked to describe how frustrated they felt during the reporting requirement.

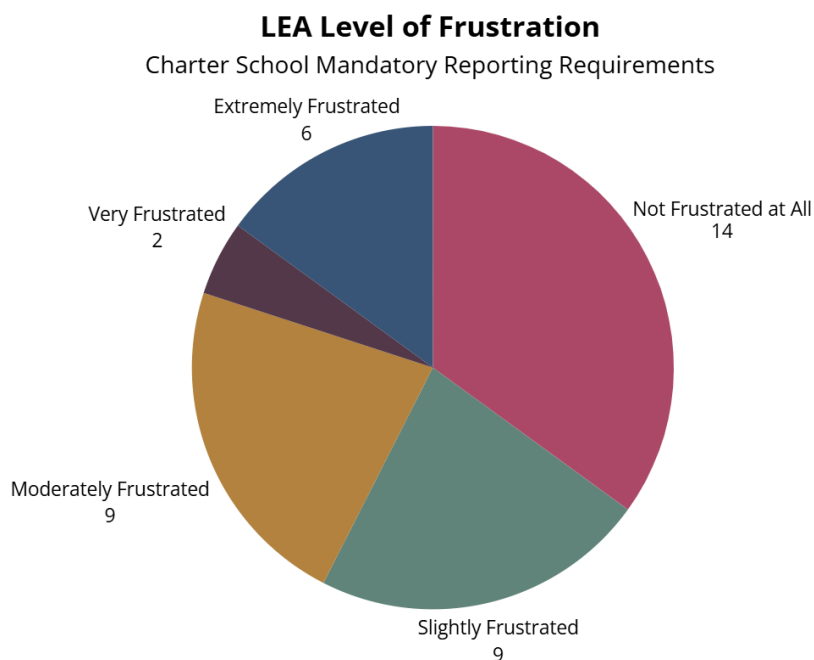
Not Frustrated at All: 14

Slightly Frustrated: 9

Moderately Frustrated: 9

Very Frustrated: 2

Extremely Frustrated⁶: 6



USBE Administrative Burden

State Charter School Board staff estimates have been included under “USBE staff”.

Time Spent

USBE staff estimated their time spent on each reporting requirement across four activities: preparation, LEA support and communication, data validation, and results analysis.

Combined together, USBE staff dedicate approximately **42,346.5 hours** on these reporting requirements which is the equivalent of more than 20 full-time employees.

**42,346.5 hours of USBE time
for 56 mandatory charter
school reporting requirements**

Frustration Level

USBE staff were also asked to describe how frustrated they felt during the facilitation of the reporting requirement.

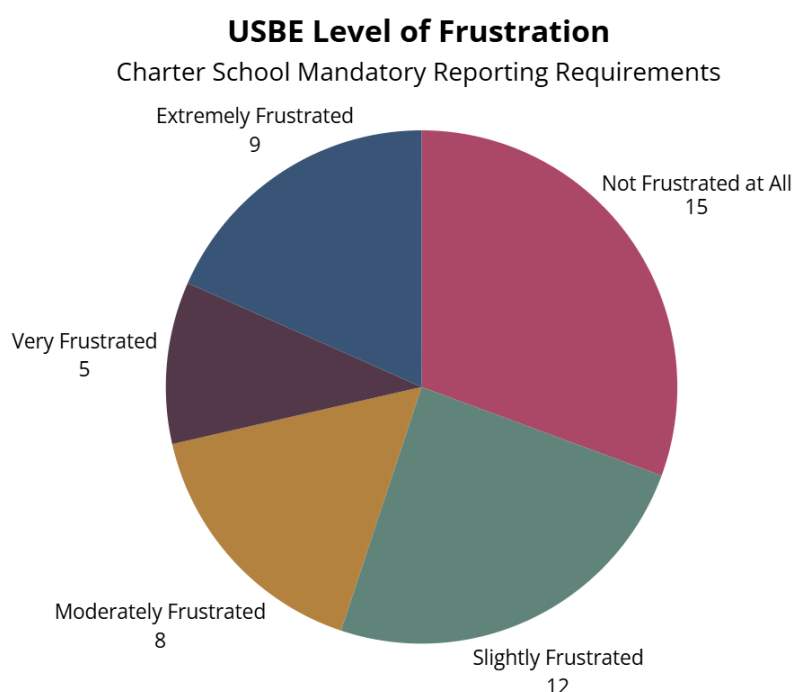
Not Frustrated at All: 15

Slightly Frustrated: 12

Moderately Frustrated: 8

Very Frustrated: 5

Extremely Frustrated⁷: 9



USBE Staff Recommendation

When compiling information for this reporting requirements catalog, USBE staff were asked if they had any recommendations for changes to the reporting requirements. USBE staff replied with many responses that have been sorted into the following categories. More details and examples related to these recommendations can be found in [Appendix B](#).

Specific Change: 7

These are recommendations that staff provided that include specific changes to the reporting requirement.

Elimination, Consolidation, or Reduction: 9

These USBE staff recommendations focus on eliminating, consolidating, or streamlining a reporting requirement.

More USBE Action based on Reporting Requirement Results: 3

These are recommendations that USBE staff take more action either in compliance monitoring, consequences, or in support based on insights from data gathered.

USBE is Currently Improving: 3

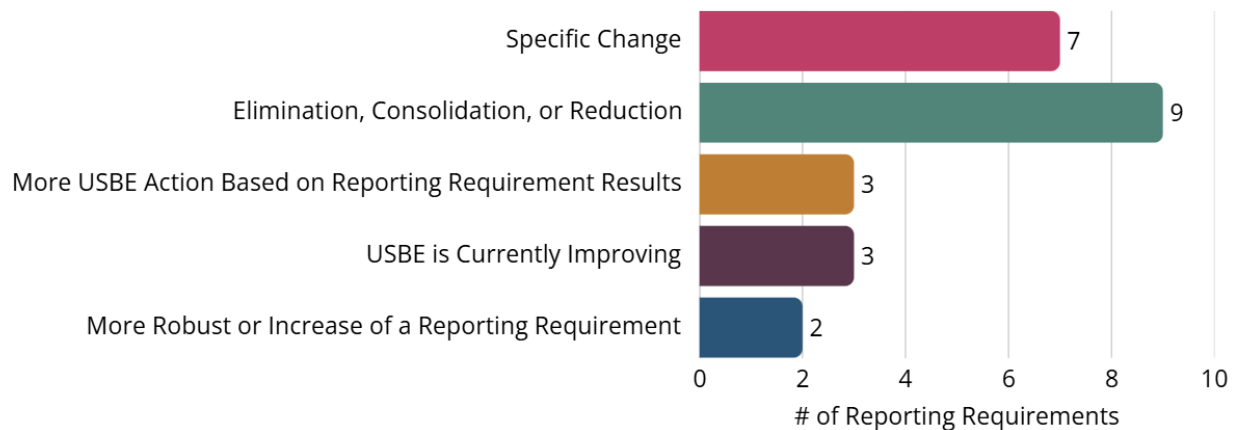
These are comments where staff mentioned that they are currently working on improving the reporting requirement.

More Robust or Increase of a Reporting Requirement: 2

These are recommendations that data elements are added to a reporting requirement.

USBE Staff Recommendations

Charter School Mandatory Reporting Requirements



Elective or Conditional Program Requirements

There are **110** reporting requirements that are only required of LEAs that elect to participate.

While not strictly required, many LEAs rely on funding or programming support offered through elective grants or programs offered by USBE, the state, or federal government.

For example, 39 out of 41 school districts participated in the Beverley Taylor Sorenson grant program in 2024. This is technically optional, but most districts choose to participate despite 8 associated reporting requirements, which take an estimated 45.5 hours to complete. Similarly, the Federal Child Nutrition programs are optional; however, LEAs rely on their funding for their school lunch programs. Despite 28 reporting requirements that take an estimated 2,698 hours of staff time, all school districts participate in the National School Lunch Program (NSLP).

“While not strictly required, many LEAs rely on funding or programming support offered through elective grants or programs offered.”

Often the decision to participate in these elective reporting requirements is driven by LEA funding. 89 elective reporting requirements were identified by USBE staff as being connected to funds, either funds being disbursed or withheld and 21 are not. 78 of these elective reporting requirements are associated with grants. These 78 reporting requirements do not represent 78 separate grants. Instead, both the initial application and any subsequent data requests—such as the CPR Training Grant application and its reimbursement form—are counted as individual reporting requirements.

Conditional Reporting Requirements

Some reporting requirements, while not mandatory for all districts or all charter schools, are required of a large population of LEAs. For example, there are 2 reporting requirements that are only required of charter schools that are authorized by the State Charter School Board. However, 139 of the 151 (92%) of charter schools in Utah are authorized by the State Charter School Board, so for almost all of the charter schools in the state, this functions as a mandatory reporting requirement.

Additionally, there were 7 reporting requirements indicated by staff that an LEA would need to submit if they were identified by various criteria as needing interventive attention or support. For example, for each school designated as a Comprehensive Support and Improvement (CSI) school, an LEA would need to submit a Support and Improvement Plan (SIP).

Analysis

While mandatory reports are considered separately, most LEAs face a much larger set of reporting requirements than are captured there. Though exact numbers of reporting requirements vary by LEA, the typical reporting workload falls somewhere between the list of mandatory reports and the list of all reporting requirements.

Additionally, while some reporting requirements have been categorized as elective or conditional, one should note that many of these are effectively mandatory because an LEA is electing or directed to perform this work in order to receive essential funding necessary to drive educational outcomes.

Total Reporting Requirement Findings

The following two lists comprise the total reporting requirements of both mandatory and elective reporting requirements, separated into district and charter school totals.

Total District Reporting Requirements

This list includes all reporting requirements that a district must complete, as well as elective programs like grants and other programs.

Note: Counts may not sum to the total due to missing data or nuanced responses that could not be categorized. Further, these totals do not include conditional reporting requirements.

Number of Reporting Requirements

180

180 total district reporting
requirements

USBE Sections

The USBE sections primarily responsible for these reporting requirements are Child Nutrition (25), Career and Technical Education (18), ESSA programs (17), Arts and Wellness (17), and Financial Operations (14).

Legislative Basis

Reporting requirements are established through federal code, state code and USBE administrative rule—frequently through a combination¹.

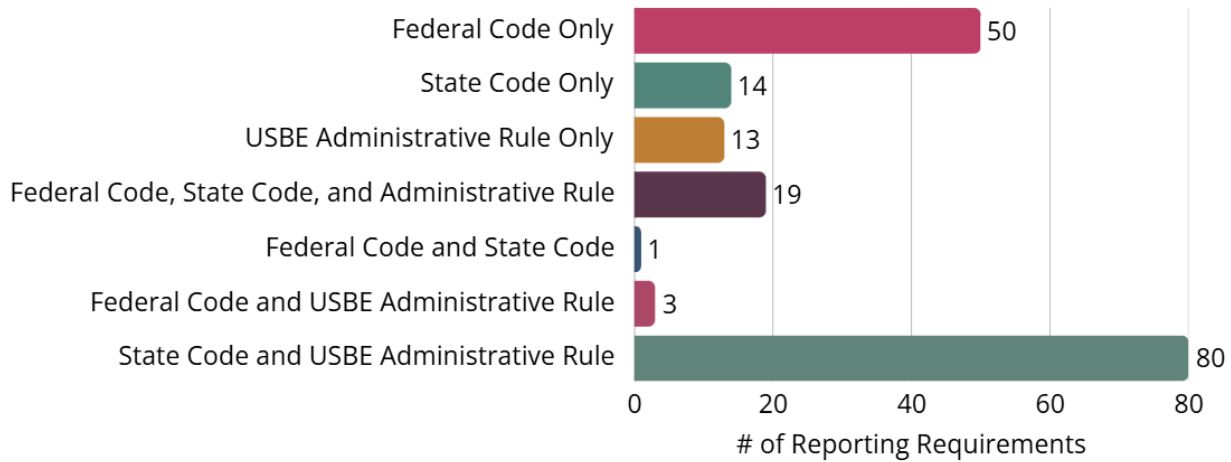
Total district reporting requirements that are governed by each combination of federal code, state code and/or USBE administrative rule:

- Federal Code Only: 50
- State Code Only: 14
- USBE Administrative Rule Only: 13
- Federal Code, State Code, and USBE Administrative Rule: 19
- Federal Code and State Code: 1
- Federal Code and USBE Administrative Rule: 3
- State Code and USBE Administrative Rule: 80

Altogether there are 74 total reporting requirements in federal code, 115 in state code, and 116 in USBE administrative rule.

Legislative Basis

Total District Reporting Requirements



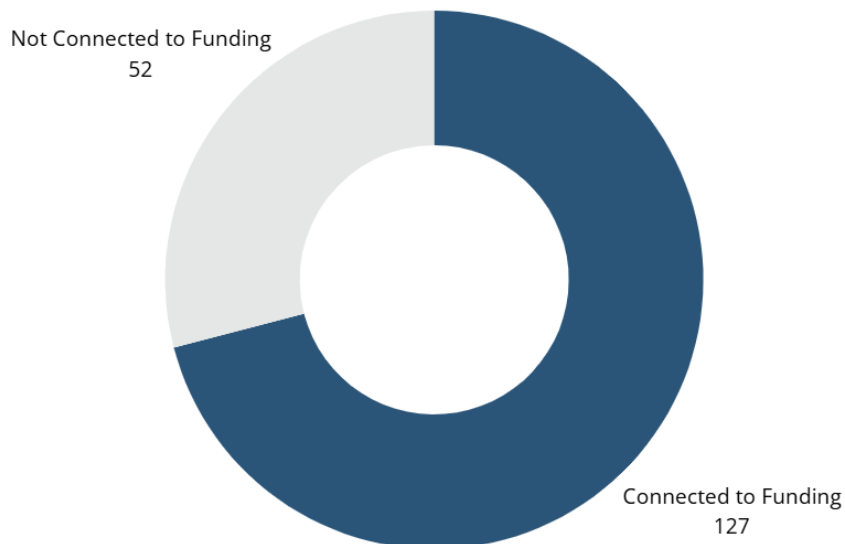
Funding Impact

USBE staff were asked whether there was funding attached to each reporting requirement. This funding could include funds given based on the data in a reporting requirement or funds withheld if a reporting requirement is not submitted.

127 total district reporting requirements are connected to funds, 52 are not.

Funding Impact

Total District Reporting Requirements



Submission Frequency

Daily²: 1

Monthly: 6

Quarterly: 2

Annually: 123

Every 2 years: 2

Every 3 years: 2

Other: 13

As Needed³: 27

Submission Methods

There are 11 methods that districts use to submit reporting requirements.

Qualtrics Form: 45

Utah Grants: 34

Email: 31

Websites⁴: 18

Google Form: 16

Utah Program Improvement Planning System for Special Education (UPIPS): 6

Other submissions include: PrimeroEdge, Progress MOVEit, FastField, Transition from Early Intervention Data Information (TEDI) and Utah Post School Outcomes Survey (UPSOS), and Utah Schools Information Management System (USIMS) / Utah eTranscript and Record Exchange (UTREx)

LEA Administrative Burden

LEA staff⁵ provided administrative burden feedback on a sample of total district reporting requirements, submitting responses for 88 of the 180 reporting requirements. Where multiple LEAs provided feedback on the same requirement, their responses were averaged.

Time Spent

LEA staff estimated their time spent on each reporting requirement in gathering information and submitting.

LEA staff dedicate approximately **17,695 hours** on these reporting requirements which is the equivalent of 8.5 full-time employees to complete less than half of the total reporting requirements.

17,695 hours per LEA
for 88 of the 180 total district
reporting requirements

Frustration Level

LEA staff were also asked to describe how frustrated they felt during the reporting requirement.

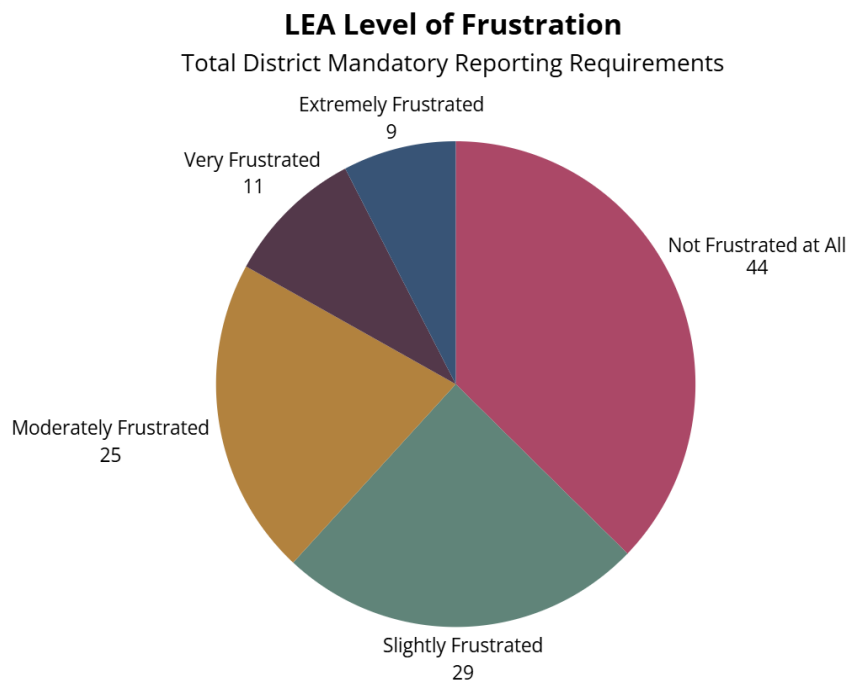
Not Frustrated at All: 44

Slightly Frustrated: 29

Moderately Frustrated: 25

Very Frustrated: 11

Extremely Frustrated⁶: 9



USBE Administrative Burden

Time Spent

USBE staff estimated their time spent on each reporting requirement across four activities: preparation, LEA support and communication, data validation, and results analysis.

Combined together, USBE staff dedicate approximately 609,256 hours on these reporting requirements which is the equivalent of more than 293 full-time employees.

**609,256 hours of USBE
for the 180 total district
reporting requirements**

Frustration Level

USBE staff were also asked to describe how frustrated they felt during the facilitation of the reporting requirement.

Not Frustrated at All: 60

Slightly Frustrated: 58

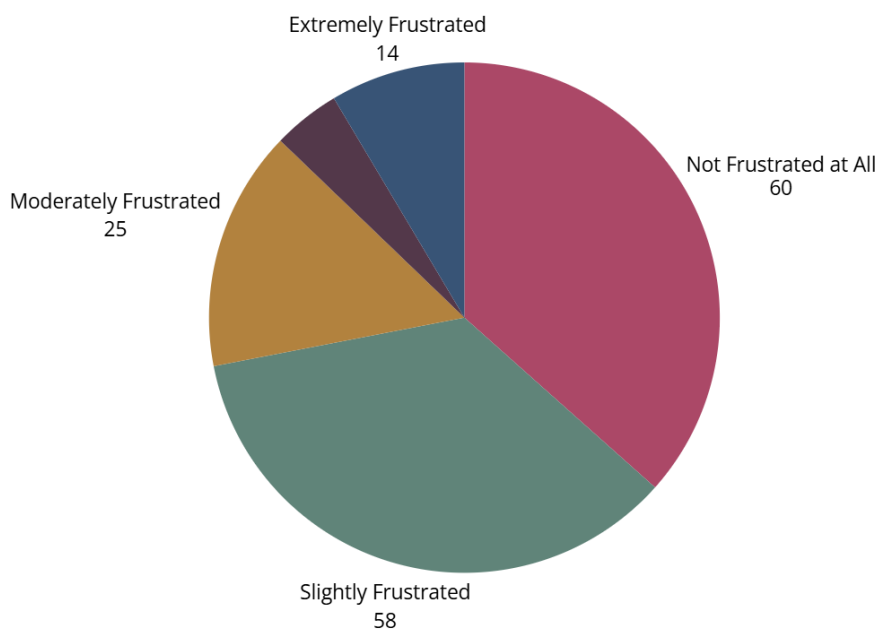
**Moderately Frustrated:
25**

Very Frustrated: 7

Extremely Frustrated⁷: 14

USBE Level of Frustration

Total District Reporting Requirements



USB E Staff Recommendations

When compiling information for this reporting requirements catalog, USB E staff were asked if they had any recommendations for changes to the reporting requirements. USB E staff replied with many responses that have been sorted into the following categories. More details and examples related to these recommendations can be found in [Appendix B](#).

Specific Change: 13

These are recommendations that USB E staff provided that include specific changes to the reporting requirement.

Elimination, Consolidation, or Reduction: 16

These USB E staff recommendations focus on eliminating, consolidating, or streamlining a reporting requirement.

More USB E Action based on Reporting Requirement Results: 4

These are recommendations that USB E staff take more action either in compliance monitoring, consequences, or in support based on insights from data gathered.

USB E is Currently Improving: 4

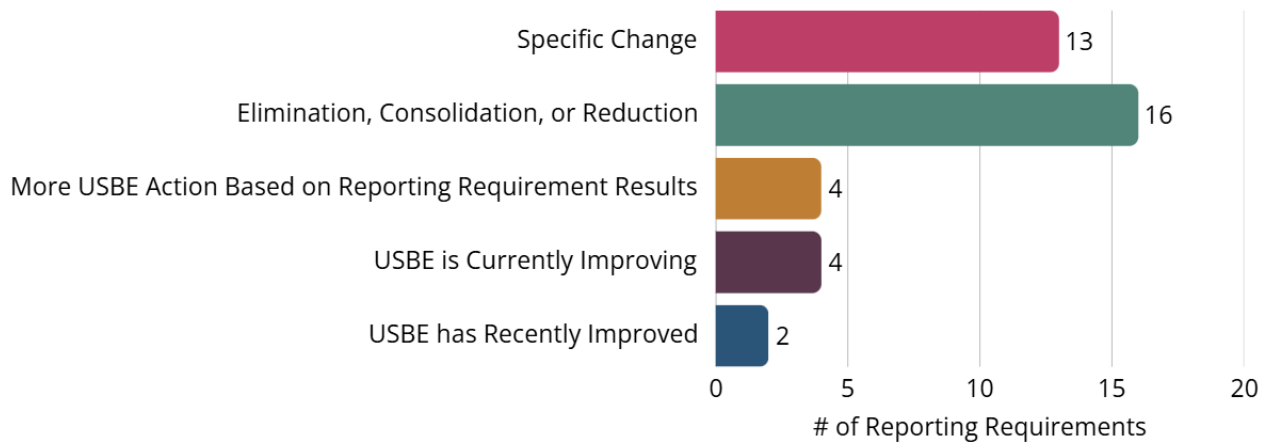
These are comments where staff mentioned that they are currently working on improving the reporting requirement.

USB E has Recently Improved: 2

These are reporting requirements that staff indicated had recently been improved.

USBE Staff Recommendations

Total District Reporting Requirements



Total Charter School Reporting Requirements

This list includes all reporting requirements that LEAs must complete as well as elective programs like grants and other programs. This includes reports that must be submitted if a charter school is authorized by the State Charter School Board.

Note: Counts may not sum to the total due to missing data or nuanced responses that could not be categorized.

Number of Reporting Requirements

176

176 total charter school reporting requirements

USB E Sections

The USB E sections primarily responsible for these reporting requirements are Child Nutrition (25), Career and Technical Education (18), ESSA programs (17), Arts and Wellness (17), and Student Services (10).

Legislative Basis

Reporting requirements are established through federal code, state code and USB E administrative rule—frequently through a combination¹.

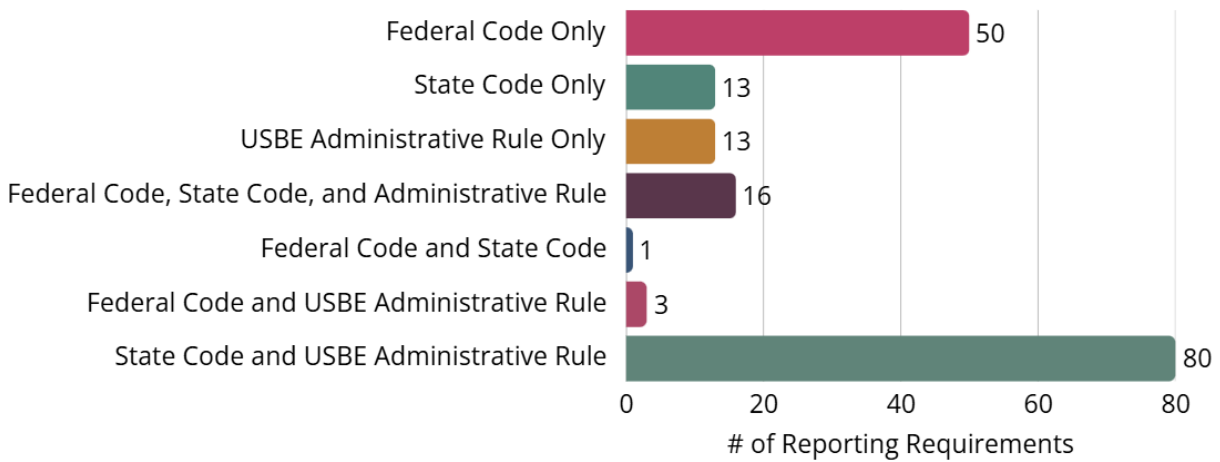
Total charter school reporting requirements that are governed by each combination of federal code, state code, and/or USB E administrative rule:

- **Federal Code Only:** 50
- **State Code Only:** 13
- **USB E Administrative Rule Only:** 13
- **Federal Code, State Code, and Administrative Rule:** 16
- **Federal Code and State Code:** 1
- **Federal Code and USB E Administrative Rule:** 3
- **State Code and USB E Administrative Rule:** 80

Altogether there are 71 total charter school reporting requirements in federal code, 111 in state code, and 113 in USB E administrative rule.

Legislative Basis

Total Charter School Reporting Requirements



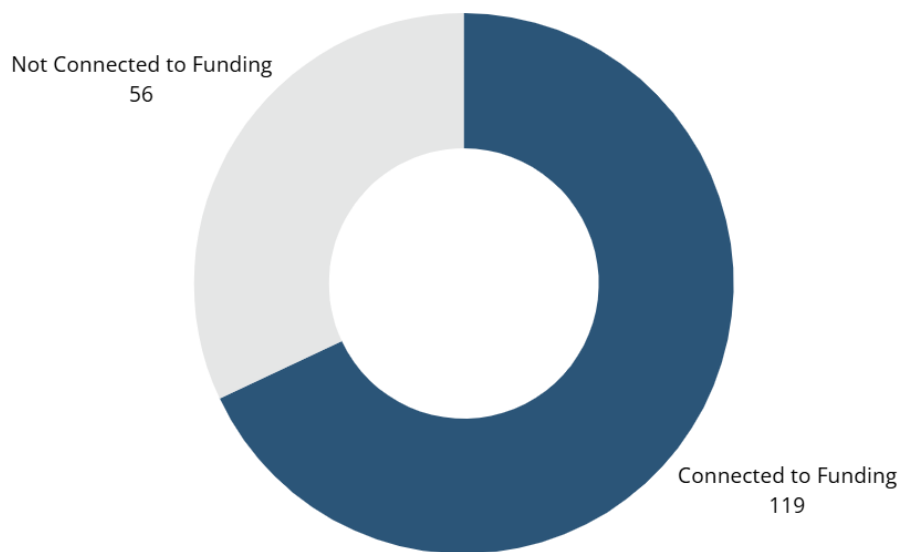
Funding Impact

USBE staff were asked whether there was funding attached to each reporting requirement. This funding could include funds given based on the data in a reporting requirement or funds withheld if a reporting requirement is not submitted.

119 reporting requirements are connected to funds, 56 are not.

Funding Impact

Total Charter School Reporting Requirements



Submission Frequency

Daily²: 1

Monthly: 5

Quarterly: 2

Annually: 119

Every 2 years: 2

Every 3 years: 2

Every 5 years: 1

Other: 13

As Needed³: 29

Submission Methods

There are 21 methods that charter schools use to submit reporting requirements.

Qualtrics form: 45

Utah Grants: 34

Email: 28

Website⁴: 19

Google Form: 17

Other submissions include: PrimeroEdge, Utah Program Improvement Planning System for Special Education (UPIPS), Progress MOVEit, FastField, Utah Post School Outcomes Survey (UPSOS), School Site Visit, and Utah Schools Information Management System (USIMS) / Utah eTranscript and Record Exchange (UTREx).

The school site visit is a portion of the SCSB Comprehensive Review.

LEA Administrative Burden

LEA staff⁵ provided administrative burden feedback on a sample of total charter school reporting requirements, submitting responses for 89 of the 176 reporting

requirements. Where multiple LEAs provided feedback on the same requirement, their responses were averaged.

Time Spent

LEA staff estimated their time spent on each reporting requirement in gathering information and submitting.

LEA staff dedicate approximately 17,726 hours on these reporting requirements which is the equivalent of 8.5 full-time employees to complete half of the total reporting requirements.

17,726 hours per LEA
for half of the total charter
school reporting requirements

Frustration Level

LEA staff were also asked to describe how frustrated they felt during the reporting requirement.

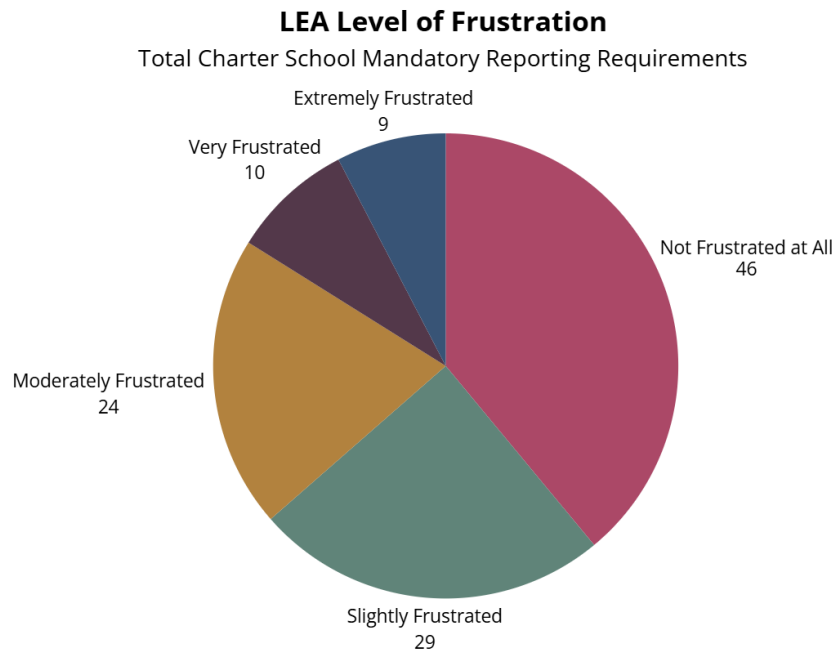
Not Frustrated at All: 46

Slightly Frustrated: 29

Moderately Frustrated: 24

Very Frustrated: 10

Extremely Frustrated⁶: 9



USBE Administrative Burden

State Charter School Board staff estimates have been included under “USBE staff”.

Time Spent

USBE staff estimated their time spent on each reporting requirement across four activities: preparation, LEA support and communication, data validation, and results analysis.

Combined together, USBE staff dedicate approximately 610,693 hours on these reporting requirements which is the equivalent of more than 293 full-time employees.

610,693 hours of USBE time for
176 total charter school
reporting requirements

Frustration Level

USBE staff were also asked to describe how frustrated they felt during the facilitation of the reporting requirement.

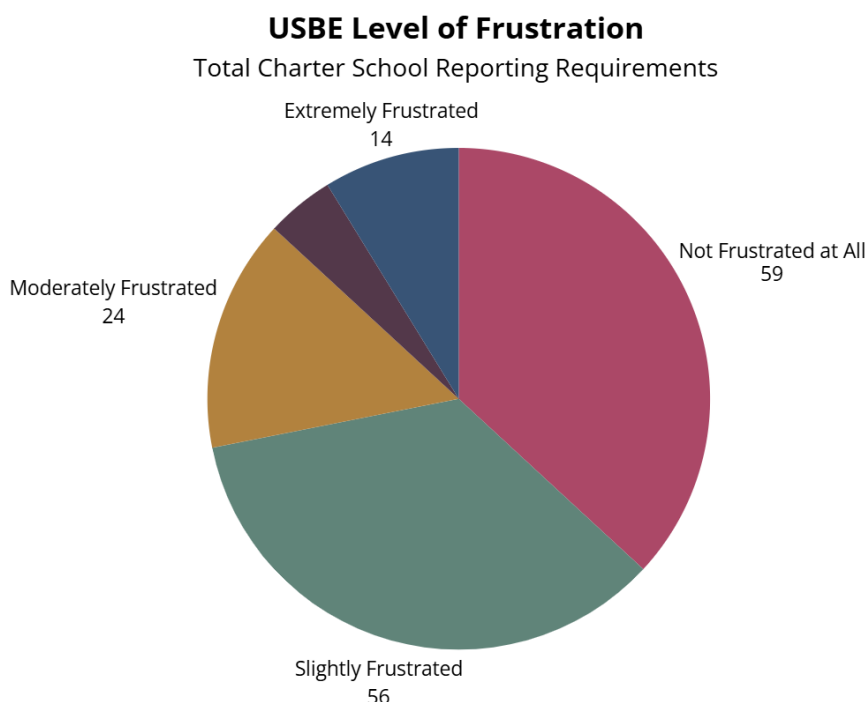
Not Frustrated at All: 59

Slightly Frustrated: 56

Moderately Frustrated: 24

Very Frustrated: 7

Extremely Frustrated⁷: 14



USBE Staff Recommendations

When compiling information for this reporting requirements catalog, USBE staff were asked if they had any recommendations for changes to the reporting requirements. USBE staff replied with many responses that have been sorted into the following categories. More details and examples related to these recommendations can be found in [Appendix B](#).

Specific Change: 12

These are recommendations that USBE staff provided that include specific changes to the reporting requirement.

Elimination, Consolidation, or Reduction: 16

These USBE staff recommendations focus on eliminating, consolidating, or streamlining a reporting requirement.

More USBE Action based on Reporting Requirement Results: 5

These are recommendations that USBE staff take more action either in compliance monitoring, consequences, or in support based on insights from data gathered.

USBE is Currently Improving: 4

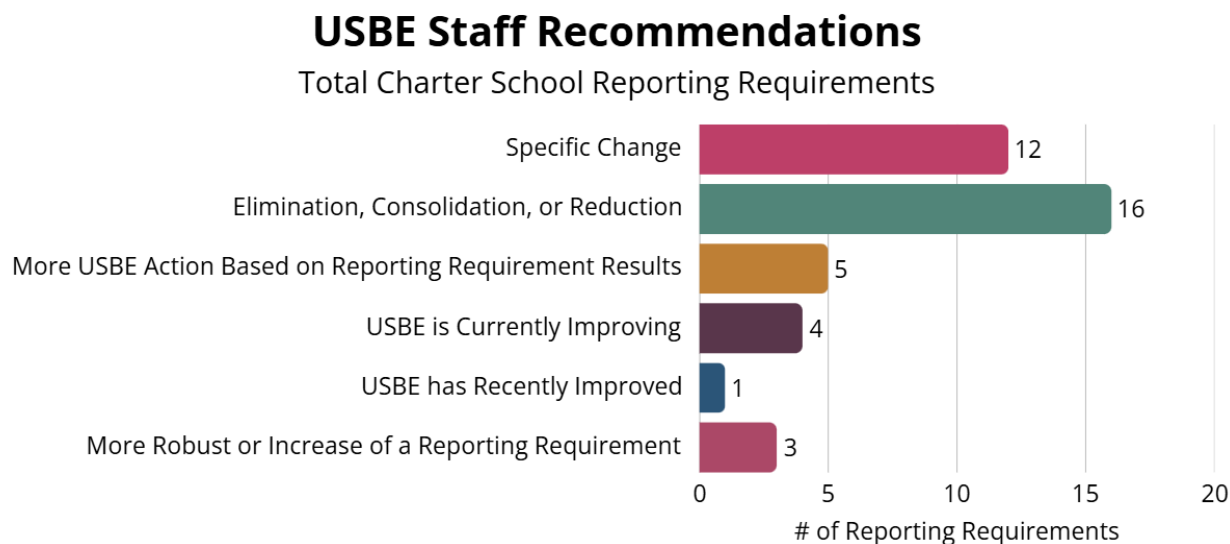
These are comments where staff mentioned that they are currently working on improving the reporting requirement.

USBE has Recently Improved: 1

These are reporting requirements that staff indicated had recently been improved.

More Robust or Increase of a Reporting Requirement: 3

These are recommendations that data elements are added to a reporting requirement.



Additional LEA Obligations

The reporting requirement catalog offers insights into reporting requirements which are required by the federal government, state legislature and USBE. The following are brief descriptions of other groups which request information, reports and data from LEAs.

Additional LEA Obligations

State Auditors
State Agencies/Entities
Local School Boards or Charter School
Governing Boards
Parents and Guardians
Members of the Community, Private
Companies and the Public at Large

State Auditors

The Office of the State Auditor (OSA) enforces standard accounting and financial reporting practices for local governments including LEAs. As part of their responsibilities, OSA requires LEAs to submit financial and operational data. LEAs must complete reports like the Fraud Risk Assessment Questionnaire annually to OSA.

The Office of the Legislative Auditor General (OLAG) is directed by the Utah Legislative Audit Subcommittee. When the Legislature makes audit requests, OLAG conducts these audits. Primarily OLAG conducts performance audits to evaluate the efficiency, effectiveness, and operations of governmental agencies or programs. As part of these audits and evaluations, OLAG periodically requests information from LEAs. LEA staff members have reported this burden increasing substantially in recent years.

State Agencies/Entities

There are many other entities that collect data from LEAs—some through USBE, others directly. For example, when there is a data breach, districts and charters report to the Utah Cyber Center. Similarly, LEAs must report to the Utah Department of Public Safety for the Utah School Safety Needs Assessment.

Local School Boards or Charter School Governing Boards

Local school boards or charter school governing boards often have their own priorities and can request data and reports from LEAs for their decision-making.

Parents/Guardians

Parents both request and receive information from LEAs. Parents can make requests of LEAs formally and informally. Under the Family Educational Rights and Privacy Act (FERPA), parents have the right to access, review and request amendments to their students' education records, thus parents can request information. When a student's records are requested, schools need to identify the correct data to respond to parents, but they also often need to verify the parent's identity and remove the data of other students.

LEA are also required to communicate with parents through report cards, opt-in/opt-out forms, a notice of the parent portal, reports on meetings with school counselors and more.

There are also many non-required data exchanges between LEAs and parents. As an example, an Assistant Principal from a medium-sized school district mentioned in an interview that they receive frequent requests of information from the members of a parent advocacy group in their area. Parents have also made other requests for their children's information including asking for student computer IDs in order to track their student's computer history. This required teachers to fill out information for each student and maintain that updated information for parents.

Members of the Community, Private Companies and the Public at Large

The public also requests information from LEAs, often in the form of a Government Records Access and Management Act (GRAMA) request. Under GRAMA, anyone can request public records and the LEA must respond in 10 business days. While LEAs are permitted to charge fees to cover the cost of searching for and compiling these requests, if fulfilling the request would take less than 15 minutes, then LEAs are responsible for completing the work for free. Even determining the amount of time a response will take, also takes LEA time.

Recently many LEA Appointed Records Officers have shared that private companies inside and outside of Utah have been using GRAMA requests for their commercial use, and inundating LEAs with requests that require response.

Other Types of LEA Administrative Burden

Besides reports or data submissions, LEAs are subject to many other requirements that result in administrative burden.

Required Trainings/Professional Development

Required training and professional development are not included in this report but represent a significant source of time and effort for LEAs. There are 30 required LEA trainings or professional development programs referenced in just USBE administrative rules, not including those only required in state and/or federal code.

Some of these trainings have more specific audiences, like the School Instruction and Sex Education Training, which is provided by USBE for educators with responsibility for any aspect of sex education instruction. Others are for all or most LEA staff, like the Data Privacy & Security Trainings, which are required for all volunteers, employees and contractors with access to student's personally identifiable information.

Trainings for a broad audience, like the federally-required Personal Protective Gear and Bloodborne Pathogens training, can result in thousands of hours of LEA employee time because many employees must complete them annually.

In an attempt to support LEAs with their required trainings and professional developments, USBE has been working to develop and provide them online at no additional cost to LEAs.

Compliance Monitoring

Significant LEA staff time is also spent on monitoring visits from USBE specialists, teacher and staff training, parent communication and other compliance activities.

Monitoring and compliance visits may also result in additional work for LEAs– such as requests for information, creating written plans and performing corrective activities. An example of this type of monitoring is program quality on-site reviews that must be completed every 4 years for approved Career and Technical Education (CTE) programs. As a part of these on-site reviews, LEAs must submit a three to five year plan, minutes and agendas for CTE program advisory committees and an active safety plan. Another example is from Adult Education, programs that are selected for on-site monitoring based on an annual risk assessment tool must gather documentation and prepare for the review.

Reporting Requirements for USBE

These are the reports that USBE must complete.

Note: Counts may not sum to the total due to missing data or nuanced responses that could not be categorized.

Number of Reporting Requirements

276

276 USBE reporting requirements

USBE Sections

Below is the number of reporting requirements submitted by each USBE section.

Data and Statistics: 84

Child Nutrition: 39

School Improvement: 37

ESSA Programs: 30

Youth in Care: 7

Career and Technical Education: 29

Financial Operations: 12

Special Education: 25

Teaching and Learning: 22

Effective Outcomes: 1

Arts and Wellness: 11

Educator Preparation: 4

English Language Arts: 2

STEM Integration and Support: 3

General Teaching and Learning: 1

Policy: 8

Educator Licensing: 6

UPPAC: 1

Student Data Privacy: 1

Achievement Support Services: 2

School Safety and Student Services: 18

School Safety Center: 1

Student Services: 16

Prevention: 1

Legislative Basis

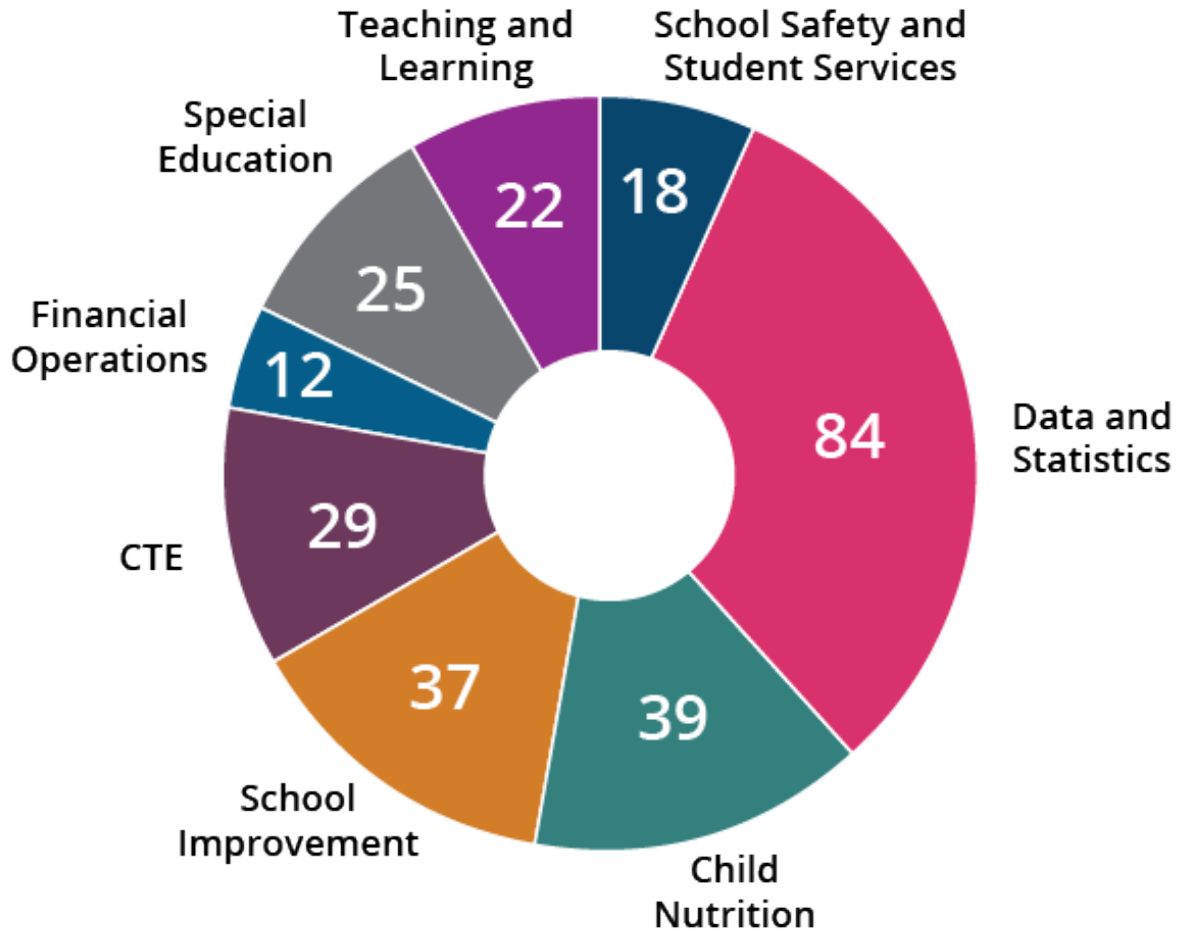
Reporting requirements are established through federal code, state code and USBE administrative rule—frequently through a combination¹.

USBE reporting requirements that are governed by each combination of federal code, state code and/or USBE administrative rule:

- **Federal Code Only: 144**
- **State Code Only: 30**
- **USBE Administrative Rule Only: 8**
- **Federal Code, State Code, and Administrative Rule: 34**
- **Federal Code and State Code: 3**
- **Federal Code and USBE Administrative Rule: 2**
- **State Code and USBE Administrative Rule: 38**
- **None Reported: 16**

Responsible USBE Sections

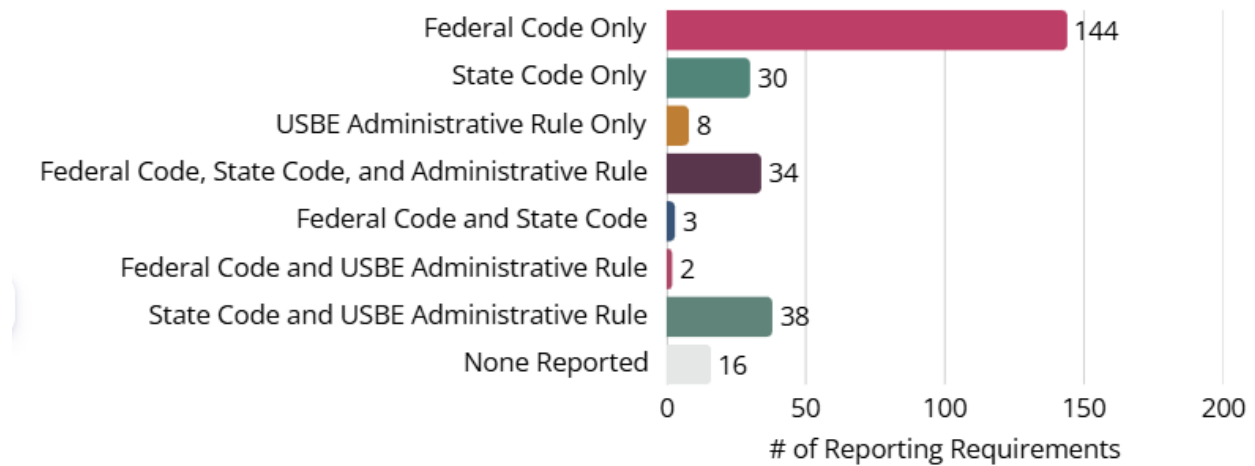
USBE Reporting Requirements



Altogether there are 183 reporting requirements for USBE in federal code, 105 in state code, and 82 in USBE administrative rule.

Legislative Basis

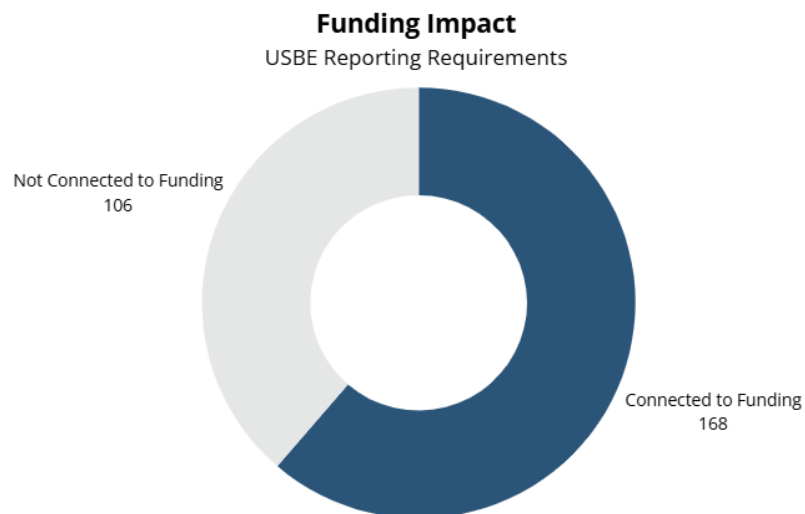
USB E Reporting Requirements



While some of the reporting requirements without legislative basis may be missing information, there are reporting requirements without legislative basis which USB E submits. One example is a report which is a submission to the USB E, which is not written into federal code, state code, or USB E administrative rules, but nonetheless completed annually.

Funding Impact

USB E staff were asked whether there was funding attached to each reporting requirement. This funding could include funds given based on the data in a reporting requirement or funds withheld if a reporting requirement is not submitted.



106 reports were not connected to funding, while 168 were connected to funding.

Submission Frequency

Daily: 1

Annually: 248

Every three years: 2

Every four years: 1

Other: 11

As Needed: 5

USBE has a daily submission to the federal government on migrant students. Migrant student programming is also the source of one of the reports that must be submitted every 3 years. The other is the Administrative Review Final Result Report Summaries for Child Nutrition.

The Perkins State Plan is submitted to the federal government every four years.

Submission Methods

There are 12 methods that USBE uses to submit mandatory reporting requirements.

EDPass: 92

EDPass is the U.S. Department of Education's data system.

Website: 72

Websites include Federal websites like the Perkins website and Title II as well as postings on USBE websites, the Utah Cyber Center website and more.

Email: 38

Vendor: 12

Other submissions include: PrimeroEdge, Progress, MOVEit, Qualtrics Survey, Shared Document, Google Form, Board Meeting Item, Vendors, and Utah's Adult Student Information System (UASIS)

USBE Administrative Burden

Time Spent

USBE staff estimated their time spent on each reporting requirement across four activities: preparation, LEA support and communication, data validation, and results analysis.

Combined together, staff dedicate approximately **99,029.5 hours** on these reporting requirements which is the equivalent of 47.5 full-time employees.

**99,029.5 hours of USBE time
for all USBE reporting
requirements**

Frustration Level

USBE staff were also asked to describe how frustrated they felt during the reporting requirement.

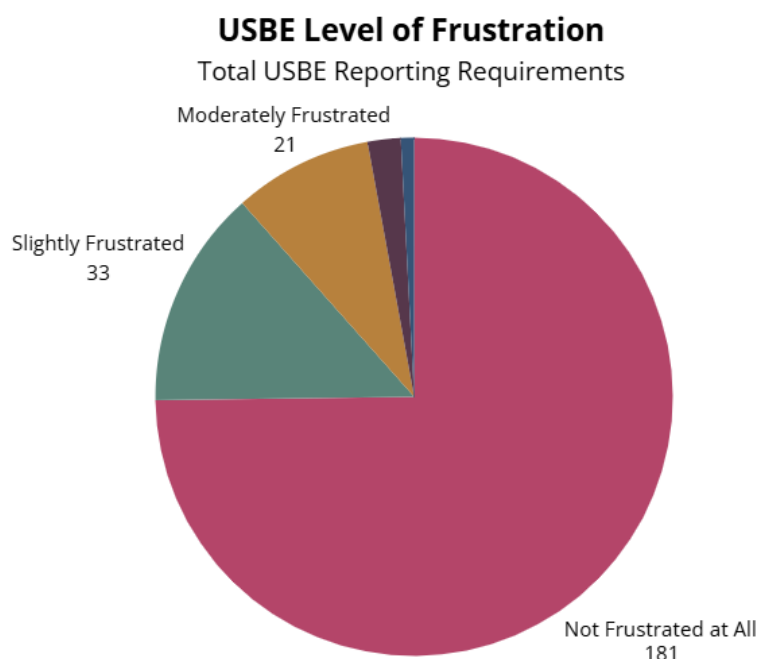
Not Frustrated at All: 181

Slightly Frustrated: 33

Moderately Frustrated: 21

Very Frustrated: 5

Extremely Frustrated⁷: 2



USBE Staff

Recommendations

When compiling information for this reporting requirements catalog, USBE staff were asked if they had any recommendations for changes to the reporting requirements. USBE staff replied with many responses that have been sorted into the following categories.

Specific Change: 19

These are recommendations that USBE staff provided that include specific changes to the reporting requirement.

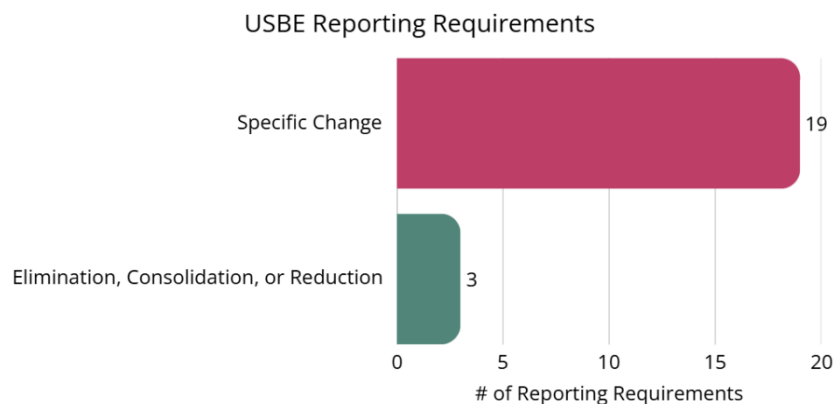
USBE staff recommended similar changes about aligning reports with other indicators or measures from other reports on seven reporting requirements.

Elimination, Consolidation, or Reduction: 3

These USBE staff recommendations focus on eliminating, consolidating, or streamlining specific reporting requirements.

One report was recommended for elimination by one USBE staff member because, "The reporting requirement and the program seem to have had limited success."

USBE Staff Recommendations



Reporting Requirement Findings Analysis

The Impact of the High Volume of Requirements

- **Districts:** Face between 63 and 180 mandatory reporting requirements.
- **Charter Schools:** Face between 56 and 176 mandatory reporting requirements.

LEA Resource Allocation

Current data cannot precisely estimate the total FTE needed to fulfill all reporting obligations. While LEA estimates suggest approximately 2 FTEs are needed for half of the cataloged mandatory reports, this figure excludes major burden drivers such as Financial Operations, Special Education, and School LAND Trust. What is clear, however, is that to fulfil the large number of cataloged reporting requirements and all other administrative tasks, LEA must allocate funding to administrators instead of allocating funding elsewhere.

**“The legislature or the board,
whoever's making all these
mandates... those become the
things that have to get done,
instead of the things that
make a school function
better.”**

*- Large School District Staff
Member*

Pain Points

Overall, the majority of LEA and USBE staff report low levels of frustration with most individual reporting requirements. However, based on LEA interviews staff are frustrated by reporting. This could either point to a few high-frustration reporting requirements or the combination of many low frustration reporting requirements added together creating high frustration.

- **USBE Requirements: 88%** rated as *"not frustrated at All" or "slightly frustrated."*
- **District Requirements: 61%** rated as *"not frustrated at All" or "slightly frustrated."*
- **Charter School Requirements: 63%** rated as *"not frustrated at All" or "slightly frustrated."*

High-Frustration Outliers

Despite generally low frustration, specific outlier reports generate significant levels of frustration. The Civil Rights Data Collection (CRDC) requirement was consistently

cited as the single most frustrating reporting requirement by LEAs due to its complexity, time demands, and a perceived lack of appropriate USBE support.

Grant Programs as Major Sources of Burden

While grant opportunities provide essential funding, the associated reporting requirements significantly increase administrative workload.

Layered Requirements

Grants often require an initial application report alongside multiple recurring evaluation reports to track funding compliance. Single grant programs can entail up to 8 separate reporting requirements—with Child Nutrition Programs requiring up to 28.

Diminishing Returns

The administrative burden has led some LEAs to question whether competitive grants are worth applying for. A USBE staff member noted that several LEAs opted out of a specific grant because they perceived the administrative hours required outweighed the funding awarded.

USBE Efforts

USBE specialists are already actively working to reduce LEA reporting burdens.

In total, USBE staff put forward 42 specific recommendations for improvement and 27 recommendations for report elimination, consolidation, or reduction.

On-going Improvements

Without prompting staff highlighted recent improvements made to 12 reporting requirements. If the survey had explicitly asked staff to indicate recent optimizations, this figure would likely be significantly higher based on staff interviews.

Agency-wide updates to the Utah Grants portal and ongoing efforts to consolidate compliance items through LEA Assurances have generated positive feedback from LEAs.

Key Reporting Requirement Challenges

Through feedback from the Data Systems and Reporting Advisory Committee, the Administration and Transparency Taskforce, LEA and USBE interviews as well as the compiling of the reporting requirement catalog, several major reporting requirement concerns have emerged.

Lack of Centralization

Prior to the creation of the reporting requirement catalog, no single source of truth had existed for reporting requirements.

Challenges for LEAs

School districts and charter schools struggled to find complete submission guidelines. Without cross-departmental visibility, LEAs were often not aware of what data other departments within their own LEA were submitting.

Challenges for USBE

Internal USBE sections have operated mostly independently in their communications about reporting requirements with LEAs, making it difficult for one USBE section to see what another is requiring. Keeping LEAs informed about requirement updates has also been inefficient and ineffective for some USBE sections, requiring some sections to communicate through multiple channels to attempt to reach LEAs.

Knowledge Loss & Turnover

The lack of a centralized catalog made onboarding and orienting new staff difficult during turnover at both USBE and LEAs.

Public and Legislative Transparency

Policymakers and the public have lacked a clear, accessible way to view reporting mandates or understand what data USBE actually collects. Some USBE staff have reported that this lack of clarity has contributed to state legislation that required redundant data collections.

Volume of New Legislative Mandates

The passage of new education mandates during each Utah Legislative session expands the reporting workload for USBE and LEAs. The USBE policy team, taking a conservative approach to calculating new reporting requirements, estimated that in the 2025 general session, 12 new reporting requirements were established for LEAs and 15 for USBE. In the 2026 general session 8 new reporting requirements were established for LEAs and 12 for USBE. In the 2026 general session two reporting requirements were eliminated for LEAs, still resulting in a net gain of 6 new reporting requirements in 2026.

12 new LEA reports in 2025
15 new USBE reports in 2025

8 new LEA reports in 2026
12 new USBE reports in 2026

LEA and USBE staff both reported in catalog responses that the first year of a new reporting requirement takes substantially longer than the following years. Launching a new requirement demands planning, designing submission methods, consulting LEA stakeholders, and training LEA staff to ensure accurate submissions.

Once data is submitted, USBE personnel must validate entries, correct errors, and analyze results.

A constant stream of new reporting mandates restricts USBE's ability to streamline existing processes, as staff time is consumed by rollout demands. Additionally, reporting mandates represent only a fraction of legislative updates. Each session, new legislation introduces administrative requirements across curriculum, testing, finance, personnel, athletics, technology, facilities and more. To manage this expanding workload alongside required reports, LEAs might direct funding toward administration rather than elsewhere.

Legislatively Mandated Quick Reporting Requirement Turn Around

Beyond the volume of new reporting requirements, legislatively imposed short deadlines strain both LEA and USBE staff, complicating effective rollout.

This strain is particularly acute for data submitted through USIMS/UTREx from LEA's SISs. These systems handle massive daily data loads and so changes are technically complex. LEAs must communicate updates to their specific software vendors, and achieving full data fidelity—through design, staff training, and software engineering. To capture a full year of reliable data—and to avoid disruptive mid-year system updates that yield incomplete results—this process can only fully launch in August of the following school year, roughly 15-18 months after the original legislative implementation date.

However, legislation frequently mandates an effective date of May or July following a legislative session, expecting active data collection for the school year beginning in August. Updating USBE's systems and ensuring accurate implementation across LEA vendor systems is simply not feasible within a one to four month window.

To comply with these unrealistic schedules, USBE must issue temporary "stopgap" surveys while permanent system updates remain in development. These workarounds double the workload for USBE staff and often force LEAs into labor-

intensive, manual data collection without the built-in automation of their primary software.

Recommendations

Informed by a comprehensive analysis of education reporting requirements, the following recommendations have been developed for consideration.

Recommendations for the Legislature

#1 LEA Cost in Fiscal Notes

Recommended Action

That the Legislature explicitly incorporate LEA administrative burden into each bill's fiscal note or an appropriate section.

Key Benefits

Increased Transparency for Taxpayers and Policymakers

Fiscal notes inform legislators and the public about a bill's financial impact to ensure adequate funding. However, current fiscal notes sometimes omit direct LEA costs, leaving local property taxpayers to absorb unfunded mandates to their local districts and charter schools. Explicitly tracking this burden gives policymakers and the public crucial, realistic data on a bill's true cost.

Closing the Communication Gap

While USBE staff attempt to include known LEA costs during the session, the rapid pace of legislative proceedings makes consulting local districts in real time difficult. Formalizing LEA fiscal reporting bridges this gap.

Implementation Considerations

To account for LEA impact, the Legislature could introduce a distinct "Local Education Agencies & Schools" reporting category or expand existing "Local Government" or "Individual & Business" metrics. To gather local estimates quickly

without stalling legislative timelines, the Legislature could consider options like establishing a rotating sample group of representative LEAs to provide fast-turnaround input or implement an LEA fiscal impact scale to categorize costs.

#2 The Reporting Requirements Catalog

Recommended Action

That the Legislature allocate \$200,000 of on-going funding for USBE to procure a dynamic software solution, transitioning the reporting requirement catalog from a static spreadsheet into an accessible, interactive platform

Key Benefits

Increased LEA Visibility and Personalization

Dynamic software offers customizable filtering and interactive dashboards. LEA administrators could filter out irrelevant reporting requirements and generate personalized views or calendars that display only their specific reporting deadlines.

Improved USBE Usability

This solution would provide system access to all USBE staff, eliminating maintenance bottlenecks by allowing program managers to update their specific requirements in real time. Modern platforms also support general project management, so staff can integrate catalog maintenance with other workflows—supporting long-term catalog sustainability.

Upgraded Catalog Content

Beyond simple text descriptions or links, an interactive platform can act as a comprehensive library for each reporting requirement. Stakeholders could access detailed guidance, instructional videos, downloadable templates, and example submissions directly within individual report profiles.

Accelerated Report Consolidation

Centralized, high-level data visibility allows all stakeholders to more easily identify overlapping data demands, eliminate redundant requests, and consolidate similar reporting obligations across programs.

Implementation Considerations

Long-term sustainability depends on adopting a user-friendly platform that roots catalog updating directly into USBE staff workflow. Remaining on a static spreadsheet will require substantial staff hours to update manually, increase the risk of errors, and discourage LEA usage due to poor navigation.

Recommendation for both the Legislature and USBE

#3 Reporting Requirement Evaluation Assessment

Recommended Action

That the Legislature and USBE adopt a standardized evaluation matrix to assess reporting requirements during legislative drafting, rulemaking, periodic reviews, and report elimination decisions

Key Benefits

Transparent Impact: Provides clear visibility into who uses each report and how the collected data drives decision-making.

Transparent Effort: Quantifies the administrative workload and resource demands placed on both LEAs and USBE.

An evaluation matrix could prevent the codification of high-effort, low-impact reports while providing data-driven justifications for eliminating mandates or investing in high-impact collections.

Evaluation Matrix: A series of questions to assess the value of a reporting requirement by evaluating the effort exerted to collect the information as well as the impact of that information on stakeholder actions.

Implementation Considerations

Effort vs. Impact Framework

The matrix acts as an evaluation tool, measuring the effort required to collect data against the impact of the resulting information.

Multi-Stakeholder Perspective

Impact and Effort can be assessed from three perspectives.

- **LEA Level:** District and Charter effort and impact
- **USBE Level:** Agency facilitation effort and impact
- **System-Wide Level:** Combined effort for LEAs and USBE and impact on LEA, USBE, policymakers, and the public

Uses Throughout the Policy Lifecycle

The matrix should be embedded across the entire policy lifecycle—from initial legislative drafting before a mandate is codified, to ongoing agency reviews and legislative oversight.

More details and a sample evaluation form can be found in [Appendix C](#).

Evaluation Matrix



Recommendations for USBE

#4 USBE Reporting Requirement Policy

Recommended Action

That the USBE adopt policies and procedures to standardize the reporting requirement collection process

Key Benefits

Consistency Across USBE

This policy will elevate agency-wide standards to match best current internal habits, eliminating inconsistent communication across sections.

Clarity for LEAs

This policy will alleviate LEA frustration by establishing clear guidelines regarding timelines, mandatory or optional reports and submission expectations.

Implementation Considerations

In drafting the new reporting requirements policy, USBE should consider including the following.

Staff will:

- Review any similar reports for possible report consolidation
- Review current data collected by USBE to ensure that there is no duplicative data collection
- Use one default submission method; if an alternative method is needed, it must go through an approval and justification process
- Follow a review and approval process outlined by USBE data governors
- Update the reporting requirements catalog to keep information current and accurate

Communication to LEAs about reporting requirements to LEAs should include:

- Consistent USBE branding
- A privacy notice
- A clear indication of whether the report is required or optional
- A clear indication of consequences associated with the report
- A citation of any relevant USBE administrative rule/statute
- If a report was submitted to USBE, a copy of the LEA's report or a detailed receipt showing successful submission should be provided to them within five business days
- If a survey is being collected, a PDF preview of all questions that will be asked should be included in the initial USBE communication for LEAs to review before beginning their submissions

#5 Recommendation to USBE: New Data Collection Legislative Request

Recommended Action

That the USBE establish an 18-month standard implementation timeline for new data collections

Key Benefits

Enhanced Legislative Transparency

Standards provide lawmakers with realistic expectations for data delivery and a clear understanding of the operational requirements for new requests, potentially encouraging more deliberate policy design surrounding data collection.

Elimination of Burden-Heavy Workarounds

An 18-month runway removes reliance on temporary, short-term solutions that often led to labor-intensive manual data entry, strain LEA and USBE resources, and delay permanent solutions.

Superior Data Quality

A realistic timeline protects data integrity by eliminating disruptive mid-year collection updates and rushed collection methods.

Implementation Considerations:

USBE may also consider developing a set of standardized evaluation metrics to assess technical complexity, system readiness, and resource requirements for any newly proposed reporting requirement. For example, some data collection, which will never go through an LEA's SIS, might be considered for shorter implementation runways after being evaluated.

Other Considerations

Utah Code [§ 53E-3-526](#) required USBE to examine recommendations for LEA input, regular reviews and sunset provisions. Based on the research conducted, these have not been recommended, but some considerations have been included here.

LEA Input

Based on interviews with USBE staff who facilitate reporting requirements, many USBE staff have close communication with LEAs who submit reporting requirements. USBE staff spent over 53,085 hours annually in training, support and communication with LEAs about their reporting requirements. It is clear from these estimates that many USBE staff find themselves in frequent communication with LEAs where feedback is also provided to staff.

Based on these findings, further opportunities for structured LEA input has not been recommended as a high priority. However, if more accurate insight into the administrative burden of reporting requirements of LEAs is desired, LEA input could be provided for each reporting requirement.

Regular Reviews of Reporting Requirements

There are many ways to ensure that reporting requirements are regularly reviewed as long as the reporting requirements catalog remains maintained.

Annual, three year, or five year review cycles could be considered.

Ultimately, it is recommended that incorporating an evaluation matrix, as seen in [Appendix C](#) into each step of the policy lifecycle would be a more powerful tool for review than a regular timed review. Additionally, if USBE staff members continually monitor the reporting requirement catalog, per recommendation #2 and #4, then regular reviews will take place.

Sunset Provisions

Sunset provisions are language written into a law that states that the law will be eliminated at a certain date. This requires the legislature to actively change the law if they would like the law to continue to be in effect.

Possible Benefits

Sunset provisions can allow policymakers the opportunity to eliminate programs or requirements that are not serving the interests of the public—either by their purpose or by their lack of efficiency. Policymakers then have the opportunity to reallocate resources to programs or reporting requirements that are better serving the interests of the public.

Many reporting requirements are, at least in part, required so that policymakers can make decisions about whether a program is effective or not. If the policymakers are not using the report or if staff feel that the information in the report is not adequate to be actionable, then policymakers should eliminate or modify the code.

Considerations

Sunset reviews introduce additional administrative burden to the legislature, USBE, and LEAs as they gather evidence for the review. This could be mitigated by a tool like an evaluation matrix outlined in recommendation #3, which standardizes the type of information policymakers might review when considering a sunset provision.

One possible implementation would be a five year sunset review on all laws or USBE administrative rules that require data collection from LEAs or USBE to USBE and/or the legislature, including grants, surveys, reports and SIS data collection elements.

Future Work

Grant and Elective Reporting Requirements

Future analysis should evaluate opportunities to consolidate grant applications and other elective reporting requirements. Assessing LEA participation rates, the administrative hours required for compliance, and the resulting funding allocations would provide insight into the return on investment of competitive grant funding relative to its administrative burden.

School Level Burden

Further research is recommended to evaluate the administrative burden that reporting requirements place on individual schools. Although measuring school-level impact was beyond the primary scope of this study, data gathered during the creation of the reporting requirement catalog revealed a significant operational footprint. Specifically, USBE staff identified 45 reports that originate at the school level or are directly submitted by school staff, including nine reports required from classroom teachers.

While nine teacher-submitted reports may appear minor relative to the 63 required from districts, the aggregate time investment is substantial. For instance, a single reporting requirement completed by every teacher statewide—even if taking only five minutes per person—could consume thousands of hours of staff time.

Trainings and Professional Development

Investigating a similar reporting requirement catalog for LEA required training or professional development could help coordination and transparency. Mandatory trainings are frequently cited by LEAs as a major source of administrative frustration and a substantial use of staff time. Creating a single repository would allow LEA to better track these requirements, while allowing the USBE and State legislature more clear insight.

Fiscal Note Misalignment

USBE staff have reported a growing trend where fiscal note estimates provided to the state legislature during the legislative process are not fully funded in final appropriations. This gap between requested and appropriated funding could significantly increase the USBE's operational burden. Unfunded or underfunded reporting mandates likely stretch existing staff capacity and agency resources, directly reducing the time USBE personnel can dedicate to supporting LEAs, improving data quality, and streamlining current reporting workflows. Investigating this misalignment could yield powerful data and insights into the legislative process and USBE funding.

Appendix

Appendix A: The Data System and Reporting Advisory Committee

In accordance with Utah Code [§ 53E-3-526](#) and under the guidance of USBE Board leadership, the Data Systems and Reporting Advisory Committee was formed with a variety of required stakeholders; however, all individuals with relevant interest and experience were invited to apply. Information and applications were emailed to subscribers on electronic mailing lists of LEA staff in May 2025. A panel of USBE staff reviewed and ranked all applications received. Members were selected based on their relevant experience and to ensure varied representation. The committee was finalized at the end of May and held its first meeting in early June 2025.

The committee has had a total of 24 members throughout its course. There are 15 members currently working in LEAs. Of these members, there is a mix of urban, rural and charter LEAs represented. Four of Utah's six largest school districts—Davis, Jordan, Nebo, and Washington County—are represented on the committee. One committee member is an elected USBE board member, five are USBE staff members, and one is a representative from Utah Division of Archives and Records Services.

ROLE	APPOINTED INDIVIDUAL
Representative from the Division of Archives and Records Services	<ul style="list-style-type: none"> • Maren Peterson
District or charter school technology director	<ul style="list-style-type: none"> • David Williams, <i>Davis</i> • Melisa Richardson, <i>Logan City</i>
District or charter school designated data manager	<ul style="list-style-type: none"> • Jim Black, <i>Washington County</i> • Caleb Olson, <i>Jordan</i> • Emily Bejarano, <i>Academica West</i>
District or charter school designated information security officer	<ul style="list-style-type: none"> • Jason Eyre, <i>Murray</i>
District or charter school appointed records officer	<ul style="list-style-type: none"> • JaDean Frehner, <i>InTech Collegiate Academy Charter</i> • Stacie Gomm, <i>Cache County</i> • Scot McCombs, <i>Canyons</i>
District or charter school legal counsel	<ul style="list-style-type: none"> • Ben Onofrio, <i>Davis</i>
District or charter school business administrators	<ul style="list-style-type: none"> • Misty Biesinger, <i>Greenwood Charter</i> • Tracy Nuttall, <i>Former Legislative Attorney</i> • Steven Harwood, <i>Jordan</i>
Other	<ul style="list-style-type: none"> • Eric Ferrin, <i>Nebo</i> • Logan Staheli, <i>Iron County</i> • Jonathon English, <i>San Juan</i>
Utah School Superintendents Association/Utah School Boards Association Representative	<ul style="list-style-type: none"> • Ben Dalton, <i>Kane County</i>
Board member of the USBE	<ul style="list-style-type: none"> • Sarah Reale
USBE Deputy Superintendent of Policy	<ul style="list-style-type: none"> • Elisse Newey
USBE Director of Privacy	<ul style="list-style-type: none"> • Katy Challis
USBE Director of Data and Statistics	<ul style="list-style-type: none"> • Aaron Brough
USBE Information Technology Deputy Director	<ul style="list-style-type: none"> • Jared Felt
USBE Chief Product Owner and Program Manager for USIMS	<ul style="list-style-type: none"> • Katrina Brinkley

Appendix B: Examples of USBE Staff Recommendations

When compiling information for this reporting requirements catalog, USBE staff were asked if they had any recommendations for changes to the reporting requirements. USBE staff replied with many responses that have been sorted into the following categories. Examples of the staff comments have been provided below.

Specific Changes

For example, one USBE staff member recommended changing a reporting requirement's submission date by a month.

A USBE staff member recommended simplifying a required data collection element based on a common LEA submission mistake.

Elimination, Consolidation, or Reduction

One USBE staff member recommended eliminating one reporting requirement because it is "an unnecessary step". Another USBE staff member recommended consolidating two reports in Student Services because, "currently UTREx and Qualtrics are used to collect this data."

One USBE staff member recommended eliminating a reporting requirement because, "the data isn't being used to establish corrective action for those schools who are not meeting the requirements." Another USBE staff member mentioned that they had submitted a policy request to repeal a code with a reporting requirement during the 2026 legislative session and would likely make another request during the 2027 legislative session.

More USBE Action Based on Reporting Requirement Results

A USBE staff member recommended more LEA training throughout the year to support an annual submission, rather than just LEA training when LEAs are submitting.

One USBE staff member recommended greater LEA accountability for accuracy. They shared, "In practice, assurances are sometimes submitted despite underlying

reporting deficiencies, which reduces the assurance's value as a compliance control. Introducing graduated consequences or corrective requirements for inaccurate certifications would strengthen oversight and reinforce the importance of accurate attestation.”

USBE is Currently Improving

A School LAND Trust staff member shared, “We are actively redesigning this form to make it easier for councils, schools, and LEAs to maintain compliance. We expect to launch the updated version within the next two years.”

In Student Services one staff member explained, “We are currently working on an updated and easier template that is being piloted in several LEAs this year”.

More Robust or Increase of a Reporting Requirement

A staff member recommended collecting an additional data element in the reporting requirement to be able to compare data and analyze the results to find actionable data.

Another USBE staff member recommended that staff “redesign the report to require a more thorough review” to support increased compliance with more robust requirements.

Appendix C: Reporting Requirement Evaluation Matrix

The proposed evaluation matrix uses a structured questionnaire to measure the strategic value of a reporting requirement by weighing the effort required to collect the data against the impact of the information on stakeholder decision-making.

Matrix Architecture

Questions are divided into two primary dimensions: *Impact* and *Effort*.

To gather an evaluation for three distinct levels, LEA, USBE, and System-Wide, tailored questions are used for each level.

Responses are weighted to generate an overall score, plotting each reporting requirement into its corresponding matrix quadrant to guide policy decisions.

Sample Questions

Below are examples of questions that could be used to plot a reporting requirement on an evaluation matrix.

Impact

1. **Is the information in the report actionable?**

Actionable means that the report includes enough information to make informed decisions

Select each of the following which is true:

- **2 points weighted:** The information gained from this report is actionable by LEAs
- **2 points weighted:** The information gained from this report is actionable by USBE
- **0 points weighted:** The information gained from this report is not actionable
- **2 points weighted:** The information gained from this report is actionable by the Legislature

2. How often does information from this report impact or change the legislature's decisions?
 - 0 points weighted: Unsure
 - 0 points weighted: Never
 - 1 point weighted: Rarely
 - 2 points weighted: Sometimes
 - 3 points weighted: Often
 - 4 points weighted: Always
3. How often does information from this report impact or change USBE's decisions?
 - 0 points weighted: Unsure
 - 0 points weighted: Never
 - 1 point weighted: Rarely
 - 2 points weighted: Sometimes
 - 3 points weighted: Often
 - 4 points weighted: Always
4. How often does information from this report impact or change LEA's decisions?
 - 0 points weighted: Unsure
 - 0 points weighted: Never
 - 1 point weighted: Rarely
 - 2 points weighted: Sometimes
 - 3 points weighted: Often
 - 4 points weighted: Always
5. How much information gained from this report is made publicly available?
 - 0 points weighted: None of the information
 - 1 point weighted: A little of the information
 - 2 points weighted: Some of the information
 - 3 points weighted: Much of the information
 - 4 points weighted: All of the information
6. How much of the information in this report is already available to the entity collecting it through other sources?
 - 3 points weighted: None of it is available through other sources

- **2 points weighted:** Some of it is available through other sources
- **1 point weighted:** Most of it is available through other sources
- **0 points weighted:** All of it is available through other sources

Effort

1. **If an opt-in report:** Select how many LEAs typically opt in to complete this report.
If a mandatory report: Select how many LEAs are supposed to complete this report.
 - **1 point weighted:** 0-20%
 - **2 points weighted:** 21-40%
 - **3 points weighted:** 41-60%
 - **4 points weighted:** 61-80%
 - **5 points weighted:** 80-100%
2. **USBE staff spend time tracking down and contacting LEAs who do not complete the reporting requirement.**
 - **0 points weighted:** Strongly disagree
 - **1 point weighted:** Disagree
 - **2 points weighted:** Neither Agree nor Disagree
 - **3 points weighted:** Agree
 - **4 points weighted:** Strongly Agree
3. **USBE staff complete extensive data review and error corrections after the submission of this reporting requirement**
 - **0 points weighted:** Strongly disagree
 - **1 point weighted:** Disagree
 - **2 points weighted:** Neither Agree nor Disagree
 - **3 points weighted:** Agree
 - **4 points weighted:** Strongly Agree
4. **How long does it take to facilitate or complete this report in USBE time?**
 - **1 point weighted:** 0-5 hours
 - **2 points weighted:** 6-20 hours
 - **3 points weighted:** 21-40 hours
 - **4 points weighted:** 41-60 hours
 - **5 points weighted:** 61+ hours

5. How long does it take to complete this report in LEA time?
 - 1 point weighted: 0-5 hours
 - 2 points weighted: 6-20 hours
 - 3 points weighted: 21-40 hours
 - 4 points weighted: 41-60 hours
 - 5 points weighted: 61+ hours
6. For the entity which is submitting the reporting requirement (LEA or USBE): It is a difficult process to collect/create the data for this reporting requirement.
 - 0 points weighted: Strongly disagree
 - 1 point weighted: Disagree
 - 2 points weighted: Neither Agree or Disagree
 - 3 points weighted: Agree
 - 4 points weighted: Strongly Agree
7. This report requires a new data collection element in UTREx
 - 0 points weighted: No
 - 3 points weighted: Yes
8. Staff at a school level (not a district staff or charter school administrator level) must work on inputting the information for this reporting requirement
 - 0 points weighted: None of the staff
 - 1 point weighted: A little of the staff
 - 2 points weighted: Some of the staff
 - 3 points weighted: Much of the staff
 - 4 points weighted: All of the staff
9. USBE must offer extensive trainings and support for LEAs to complete this reporting requirement
 - 0 points weighted: Strongly disagree
 - 1 point weighted: Disagree
 - 2 points weighted: Neither Agree or Disagree
 - 3 points weighted: Agree
 - 4 points weighted: Strongly Agree
10. USBE staff must receive extensive trainings and support to complete this reporting requirement

- **0 points weighted:** Strongly disagree
- **1 point weighted:** Disagree
- **2 points weighted:** Neither Agree or Disagree
- **3 points weighted:** Agree
- **4 points weighted:** Strongly Agree

Citations

Jilke, S., Bækgaard, M., Herd, P., & Moynihan, D. (2024). Short and sweet: Measuring experiences of administrative burden. *Journal of Behavioral Public Administration*, 7. <https://doi.org/10.30636/jbpa.71.340>

Office of the Legislative Auditor General, State of Utah. (2019, December). *A performance audit of public education reporting requirements* (Report No. 2019-14). https://le.utah.gov/audit/19_14rpt.pdf