RAISE Act Report

ALABAMA STATE DEPARTMENT OF EDUCATION

ERIC G. MACKEY, STATE SUPERINTENDENT

Renewing Alabama's Investment in Student Excellence (RAISE)

Initial Audit and Recommendations

Report of the State Superintendent of Education

to

The Honorable Kay Ivey, Governor,

the Legislature, and the Public

Filed pursuant to Ala. Code §16-13-368(c), (1975)
the Renewing Alabama's Investment in Student Excellence (RAISE) Act

Prepared with the support of Cognia, the Department's external audit partner

November 1, 2026

Executive Summary

Overview. The Renewing Alabama's Investment in Student Excellence (RAISE) Act is already making a clear and unprecedented difference in Alabama's schools. Alabama's school funding system has made many gradual reforms and improvements through the decades, but only on rare occasions does it see a massive leap forward in the form of a new funding stream or system of financial disbursement. The RAISE Act is one of those Acts that has not only substantial initial impact, but even more potential for future growth and improvements as it focuses attention and directs funding based on student demographics:

- Poverty,
- Special education,
- English language learners, and
- Gifted.

Furthermore, the Act provides a unique opportunity to refine our strategies and refocus our energies. As readers may note, the Superintendent often repeats the phrase:

Strategy, Focus, Investment.

Alabama has developed a *winning strategy*, which we tweak and refine every year.

Alabama has *focused* on that strategy, "*keeping the main thing, the main thing*."

Alabama is *investing in its future through RAISE*, the next bold step forward in that investment.

Balance. The key focus of this audit, the upcoming common application, and subsequent work is to reduce the paperwork burden on school system leaders and local school principals and to restore balance where practicable. We all recognize that data are needed, that reports on progress are essential, and that documentation protects both our people and their work. However, every data request, progress report, and document also takes time. The goal is not to eliminate accountability, but to balance accountability with outcomes. At its base, it is all about return on investment (ROI). Closely associated with ROI is efficiency. It may be data or documentation that is essential to the work, but can it be collected, coalesced, and reported in a more efficient manner?

About these findings. This audit is conducted as part of the ongoing implementation of the RAISE Act, one of the most consequential and important pieces of funding legislation in Alabama's history, and was conducted by the Alabama State Department of Education (ALSDE) as part of its ongoing continuous-improvement work. The requirements it reviews were adopted over many years, through many separate laws, appropriations, and rules. It is important to note that each requirement was put in place to serve a legitimate purpose. This review found no extraneous or

unnecessary requirements, at least in context of the requirement's initial adoption and implementation. ***The findings describe how those requirements fit together today and where they can be better aligned. They are not an assessment of any single office, agency, or policymaking body.*** All findings and requirements are bound by legislative requirements.

Statutory Authority. The RAISE Act charges the State Superintendent of Education, with the support of an external partner, to audit the State laws, regulations, reporting requirements, and processes that apply to Alabama's public schools; to identify those that are, in the statute's words, "out-of-date, unnecessary, or otherwise burdensome"; and to recommend corrective actions that empower schools, reduce bureaucracy, and improve student achievement (Ala. Code §16-13-368(c) (1975)). The ALSDE conducted the audit in August and September 2026 with the support of Cognia.

Time back for students. Asked where recovered time would go if their documentation time were cut in half, 88% of principals who responded to the survey chose classroom observations and feedback (63%) or teacher coaching and professional learning (25%). Fundamentally, we know that principals need to spend every minute they can outside their offices and inside classrooms, gymnasiums, cafeterias, and even on the playgrounds and ballfields with their students and faculty. Every hour the recommendations in this report return to schools is an hour that can go to teaching and learning.

Additional aligned work and mission. In 2025-2026, the ALSDE was invited to join a small cohort of states in a state-driven initiative network called "States Leading States" (SLS) through the Council of Chief State School Officers (CCSSO). Each state was encouraged to design a project specific to that state's identified needs. Alabama chose to create a common school planning document. The survey of school and school system leaders verifies that this is the right project for Alabama to undertake currently. The ALSDE plans to unite the common plan project with the common application with as many overlapping areas as possible to improve efficiency. Through the SLS network, Alabama has gained access to consultants that designed common applications as well as common planning tools in states like Arkansas, Louisiana, and others. Additionally, some other states in the network are undertaking similar work, so states will be able to learn from one other over the next two to three years.

Background and Context

The ALSDE serves approximately 702,000 students in more than 1,500 schools across 155 local education agencies (LEAs), many of them in rural communities. Every requirement examined in this audit is ultimately carried out in one of those schools as a form to complete, a dataset to submit, a plan to post, or a deadline to track.

Six layers of requirements apply to Alabama's public schools:

Federal Law. Federal laws including the Individuals with Disabilities Education Act (IDEA); The Elementary and Secondary Education Act (ESEA) currently titled the Every Student Succeeds Act (ESSA) and previously titled as the No Child Left Behind Act (NCLB); The Rehabilitation Act of 1973, particularly Section 504; The Americans with Disabilities Act (ADA); The McKinney-Vento Homeless Education Act; The Farm Bill; and various other Acts of Congress guide programs at every grade level in every public school.

Federal Guidance, Rule, and Mandates. In addition to Acts of Congress, federal agencies have rulemaking authority that direct and regulate schools and school systems. These can initiate from rulemaking authority, Executive Orders, or letters from the U.S. Secretary of Education, commonly called "Dear Colleague Letters."

State statute. Title 16 of the *Code of Alabama*, together with legislative session acts (the Literacy Act, the Numeracy Act, the Principal Leadership and Mentoring Act, the Teacher's Bill of Rights, the RAISE Act, and others), imposes program, reporting, and posting duties directly on the ALSDE and on LEAs.

Appropriations language. The annual Education Trust Fund Appropriations Act attaches line-item reporting conditions (expenditure recaps, effectiveness reports, and counts) that recur each fiscal year and may benefit from periodic review once their original questions have been answered.

Administrative rules. Title 290 of the *Alabama Administrative Code* carries the State Board of Education's rules on accountability, educator preparation and certification, special services, facilities, transportation, and school operations.

ALSDE processes. Memoranda, applications, assurances, surveys, and data collections issued by the ALSDE operationalize the layers above and add deadlines and formats of their own as necessary to effectuate the various Acts and Rules.

Each layer serves a legitimate purpose. As requirements were adopted across multiple policy areas and over many years, opportunities emerged to improve visibility across systems, periodically review longstanding requirements, and promote greater reuse of information already collected.

Methodology

The audit combined document review with structured stakeholder engagement, conducted between August 2026 and September 2026 by the ALSDE with the support of Cognia, its external partner under Ala. Code § 16-13-368(c) (1975). Its findings inform the design of the unified application required by § 16-13-368.

Document review

An inventory of the ALSDE's legislatively required reports: approximately 24 recurring reports with their statutory or appropriations authority, recipients, frequency, and internal owners.

A scan of Title 16 mandates and recent session acts for reporting, posting, and application duties placed on LEAs and the ALSDE.

A review of *Alabama Administrative Code* Title 290, drawing on the ALSDE's Phase I Administrative Rule Inventory (current as of September 1, 2023), which catalogs each regulatory statement, its statutory authority, and its count of discretionary regulatory restrictions. As noted in the report, significant sections of Title 290 have been updated since this reference.

A review of the ALSDE's 2026–2027 data collection calendars for principals, curriculum leaders, and student information system administrators, to trace how State deadlines reach school and district staff.

- A review of the ALSDE's Superintendent Memoranda to LEAs for fiscal years 2024–2026, including announcements, applications, data calls, and compliance reminders, to see how requirements reach districts.
- Note that federal laws, rules, and mandates were not reviewed by the outside reviewer.

Stakeholder engagement

As the statute requires, the audit gathered considerations and recommendations from school and system leaders, educators, advocates, and families through statewide surveys. Survey A, for system leaders, was open September 8–25, 2026, and received approximately 120 responses. Survey B, for principals, was open September 8–23, 2026, and received approximately 235 responses. Survey C, for various other educators, was open September 8–21, 2026, and received approximately 204 responses. Survey D, for advocates and families, was open September 21–25, 2026, and received approximately 21,631 responses.

The surveys were voluntary and open to everyone in each group, so respondents chose to take part and are not a random sample; results describe those who responded rather than every Alabama educator or family. The size of the response, approximately 22,190 people across four groups, and the consistency of what each group reported give weight to the findings.

Screening criteria

Each requirement was screened against four questions:

1. **Current?** Does the requirement serve a purpose that still exists, or has its program, deadline, or funding source concluded?

2. **Unique?** Is the information collected anywhere else, by any layer, in any format?

3. **Proportionate?** Is the effort required of schools proportionate to the use made of the product?

4. **Aligned?** Does the requirement's deadline and format fit the planning and budgeting calendar the unified application will establish?

Key to Recommendations

Based on the survey results and internal audit, there are 12 recommendations for further action and/or consideration, which are referenced below and color coded for ease of use.

Legislature (R1–R3): combine 13 line-item reports into one annual report, repeal 3 reports that have completed their purpose, set a 4-year sunset on new reports, and reuse data the State already holds rather than requesting it again.

Governor (R4): direct State agencies to register and screen the requests they make of schools and to share data with the ALSDE so schools are not asked twice.

State Board of Education (R5): review *Alabama Administrative Code* periodically, with a goal to revisit each section every six years.

ALSDE (R6–R12): deliver the unified application by February 2028, publish a registry of requirements, published a fixed data calendar, name one official respondent system for each type of data, repeat the stakeholder survey in the final year of each quadrennium, adopt one annual assurances package, let completed trainings carry forward, and move school plans to a multi-year cycle. *NOTE that some recommendations for the ALSDE likely require permissions from other federal and/or State entities.*

Results and Recommendations

1. Legislative reporting has evolved over time through multiple statutes and appropriations provisions, creating opportunities to consolidate reporting into a more streamlined structure. The ALSDE files approximately 24 recurring reports with the Legislature, many providing related spending information to the same few recipients on differing schedules.

The reports are due on at least 6 different due dates: October 1, November 1, December 1, the first day of session, the tenth legislative day, and 30 days before session. This does not include additional reports required via Executive Orders. Approximately 13 legislative reports could be combined into one annual report.

Most of the reports summarize spending for Education Trust Fund line items such as the Alabama Reading Initiative, the Alabama Math, Science, and Technology Initiative (AMSTI), Alabama Science in Motion, computer science initiatives, and National Board certification stipends. They go to substantially the same readers: the chairs of the House Ways and Means Education and Senate Finance and Taxation Education Committees, the Legislative Fiscal Officer, and legislative staff.

The ALSDE has already combined some reports in practice. The Literacy Act report is included in the Alabama Reading Initiative report, and Science in Motion reporting is included in AMSTI's report. The underlying mandates remain separate in law, so formal consolidation would align statute with current practice. For at least two reports, the inventory indicates that the responsible office or recipient should be confirmed.

Recommendations to Address Number 1

R1 Consolidate legislative reports. Replace the recurring line-item reports with a single Annual Education Programs Report, filed each year by December 31, with one chapter per program, delivered to a single statutory distribution list and published on the ALSDE's website. Semiannual expenditure recaps would become an annual chapter plus the data already visible in the state accounting system.

R2 Repeal completed reports. Repeal three reports that have completed their purpose: the Digital Tools for Teachers report (one-time, initiative complete); the Special Education Professional Development report (tied to FY2020 spending); and the Principal Leadership and Mentoring Act reports (final reports due in the 2026 session). Any ongoing spending information would move into the annual report.

2. **Funding programs currently use multiple application processes that may be able to be aligned through the unified application.** Respondent districts complete up to 13 separate grant applications, each with its own form and deadline, depending on their interests and needs. Sixty-two percent (62%) of respondent system leaders place plan and application paperwork among their three most time-intensive areas. Utilizing formula-driven funding, as opposed to grant-based funding can also reduce the burden of paperwork on both local LEAs and the ALSDE.

Funding programs utilizing State funds currently use multiple application processes that may be aligned through the unified application initiative. Currently, each grant program has its own announcement, form, budget template, and deadline. Districts often provide the same enrollment, staffing, spending, and planning information across multiple funding applications, creating opportunities for greater integration and data reuse.

There is precedent for consolidated application in Alabama. The ALSDE currently utilizes a consolidated application system called E-GAP for most federal fund applications and awards. The system is relatively user-friendly and generally well-liked by ALSDE and LEA staff. As the ALSDE moves toward a consolidated application for State funds, it will be important not to lose the current consolidated program that works well. This should be a priority area since 62% of respondent system leaders place plan and application paperwork among their three most time-intensive areas. Some smaller sub-grant areas that do not go to all LEAs (e.g., 21st Century Community Learning Centers and McKinney-Vento homeless) also require separate applications. Even though they utilize Federal funds, because they are not formula driven, they do not fit inside the current E-GAP system.

The RAISE Act's unified application is designed to bring these processes together in one application that aligns planning, budgeting, and reporting for all state and federal funding programs. It must be operational for the 2028–2029 budget cycle.

Recommendations to Address Number 2

R6 Allow required trainings (e.g., bully prevention, etc.) to carry forward until their content changes, rather than repeating them annually. Repeated trainings and sign-offs were the most often indicated areas of concerns as too time-intensive for LEA personnel. Whenever possible, combine required assurances into a single annual assurances instrument for each LEA.

R7 Better align plan cycles and move school and LEA improvement plans from annual to multi-year cycles. Respondent principals most often identified plan updates as time intensive.

R8 Deliver the unified application on schedule. Complete development by February 2028 and bring all State and federal funding applications, plans, budgets, and accountability reports, including RAISE Act accountability plans, inside it for the 2028–2029 budget cycle, as § 16-13-368 requires.

3. **Some requirements were designed to address specific circumstances or initiatives and may benefit from review to determine whether they remain necessary in their current form.** Three (3) legislative reports relate to completed, one-time, or FY2020 activities and are candidates for repeal. The Digital Tools for Teachers report was a one-time report tied to a supplemental appropriation, and the initiative is complete. The Special Education Professional Development report still calls for a breakdown of FY 2020 spending. The Principal Leadership and Mentoring Act reports were due on the first days of the 2025 and 2026 sessions. Other reports are tied to page numbers of past appropriations bills and carry forward from one budget year to the next, which a periodic review would address.

Recommendations to Address Number 3

***R2 (Repeated)* Repeal completed reports.** Repeal three reports that have completed their purpose: the Digital Tools for Teachers report (one-time, initiative complete); the Special Education Professional Development report (tied to FY2020 spending); and the Principal Leadership and Mentoring Act reports (final reports due in the 2026 session). Any ongoing spending information would move into the annual report.

R3 Adopt a sunset default. Provide by statute that any new report required of the ALSDE or of LEAs expires after four years unless reauthorized, and that new education acts state which existing collection the new requirement replaces or joins.

4. **Requirements have accumulated over time as new priorities and programs have been adopted, creating an opportunity for periodic review and alignment.** Recent laws have added reports to support new priorities, and existing reports have generally continued alongside them.

For example, the Principal Leadership and Mentoring Act (Act 2023-340) created three (3) reports to four (4) different recipient lists. The curriculum-posting act (Act 2024-35) added an annual complaint report, and the Teacher's Bill of Rights (Act 2024-409) added an annual discipline-data report. The RAISE Act adds accountability plans, a published guide, report card sections, and committee reports. Each law addressed its own priority, and none was designed to combine its reporting with existing requirements.

Some rules remain associated with statutory frameworks that have been in place for many years, such as the Basic Skills Education Programs rule (Acts 93-907) and the Catastrophic Trust Fund rule (Acts 99-594) and may benefit from periodic review to confirm ongoing alignment with current needs. Respondent system leaders rated personnel and certification the second most time-intensive reporting area.

Recommendations to Address Number 4

R3 *(Repeated)* Adopt a sunset default. Provide by statute that any new report required of the ALSDE or of LEAs expires after four years unless reauthorized, and that new education acts state which existing collection the new requirement replaces or joins.

R5 Cyclical Rule Review. Adopt a regular, six-year rolling review of the *Alabama Administrative Code*, updating or retiring rules as practicable. The State Board of Education, with support of the ALSDE, regularly revisits sections of the Code at least annually, but currently no set calendar of review exists. The review cycle should begin in the FY2029 year to align with other RAISE Act priorities.

5. **Requirements are communicated through multiple channels and respondent systems that have developed to meet various programmatic needs over time.** Respondent stakeholders indicated that greater coordination could improve usability and efficiency. The ALSDE's primary form of formal communication is via the State Superintendent Memo. Under the current administration, the Superintendent has greatly reduced the number of Memos by utilizing a weekly newsletter (Midweek Matters) to accommodate simple announcements that had previously gone via Superintendent Memo. However, about 100 memos per year are still issued, primarily to remind local superintendents and staff members of upcoming deadlines or legal requirements. Only rarely does a Superintendent Memo or letter initiate from the Superintendent himself with new guidance. An example of this was the Memo he issued shortly after the assassination of Charlie Kirk. Most Memos initiate within individual sections and matriculate to the Superintendent. Additionally, some section leaders send additional reminders via email and other means. For instance, an announcement that is only relevant to afterschool leaders would not necessarily go to the LEA superintendent unless deemed necessary by the State Superintendent.

State data collection and informational notices reach districts and schools through memos, calendars, and operational systems that have developed to meet different program needs. Respondent stakeholders indicated that additional coordination of communication channels and submission processes could further improve efficiency and predictability.

The ALSDE's memos to LEAs include monthly Foundation Program notices, revised versions of earlier guidance, and yearly cycles such as capital plans, asbestos regulations, transportation route reports, unused-facilities data, self-assessments, and budget hearings, each with its own submission format.

Enrollment, personnel, finance, and incident data may need to be entered into more than one data collection system. Designating one official source for each type of data may allow information to be entered once and reused. Two-thirds of respondent districts (66%) have hired or reassigned staff primarily to manage state and federal reporting, including 60% of respondent districts with fewer than 2,500 students.

Recommendations to Address Number 5

R4 Required Other State Agencies to Work with ALSDE to Limit Data Collections. Provide that State agencies reuse data the ALSDE already holds in an authoritative system rather than requesting it again from LEAs, absent a documented change. Executive orders apply to executive-branch agencies. Several of those agencies also place requirements on schools, for example through health, safety, and social services programs, so an order can support streamlining beyond the ALSDE's own authority. Executive branch agencies should enter into data-sharing agreements with the ALSDE so schools are not asked for information another State agency already holds, and establish an interagency working group to gather ideas for data sharing and cooperation.

R9 Publish a requirements registry. Maintain one searchable, public registry of every requirement placed on LEAs (its authority, the data requested, its deadline, and its owner) so that the full picture assembled for this audit remains available going forward.

R10 Publish a comprehensive data collection calendar. Superintendent Memos may continue to be used as reminders and avenues for sharing important information, however an annual collection calendar would facilitate planning at the LEA level.

R11 Name authoritative data sources. Designate, for each data domain (enrollment, personnel, finance, incidents), the single system of record from which every other consumer draws.

6. **Respondent stakeholders across all groups identified similar opportunities to improve coordination, communication, and data management processes.** Ninety-eight percent (98%) of respondent system leaders report re-entering data the State already holds in another database or format and 84% of respondent educators re-enter the same information in more than one place. Additionally, many families reported that they sometimes had to provide information to the LEA that they believe the LEA already holds. Since data collection from parents and families occurs exclusively at the LEA level, rather than by the State, a deeper dive into this will be needed in the future. The State's common Student Information System (SIS) is provided by PowerSchool., PowerSchool has worked with LEAs and the State to reduce duplicative entries over the past 5-7 years; however, more investigation into this area is needed.

Respondent system leaders, respondent principals, respondent educators, and respondent families each reported providing the same information more than once or checking several sources to find it. Feedback across all four stakeholder groups reflected similar themes regarding communication, reporting, and access to information.

Recommendations to Address Number 6

R4 (*Repeated*) Required Other State Agencies to Work with ALSDE to Limit Data Collections.Provide that State agencies reuse data the ALSDE already holds in an authoritative system rather than requesting it again from LEAs, absent a documented change. Executive orders apply to executive-branch agencies. Several of those agencies also place requirements on schools, for example through health, safety, and social services programs, so an order can support streamlining beyond the ALSDE's own authority. Executive branch agencies should enter data-sharing agreements with the ALSDE so schools are not asked for information another State agency already holds, and establish an interagency working group to gather ideas for data sharing and cooperation.

R6 (*Repeated*) Allow required trainings (e.g., bully prevention, etc.) to carry forward until their content changes, rather than repeating them annually. Repeated trainings and sign-offs were the most often indicated areas of concerns as too time-intensive for LEA personnel. Whenever possible, combine required assurances into a single annual assurances instrument for each LEA.

R7(*Repeated*) Better align plan cycles and move school and LEA improvement plans from annual to multi-year cycles. Respondent principals most often identified plan updates as time-intensive.

R9 (*Repeated*) Publish a requirements registry. Maintain one searchable, public registry of every requirement placed on LEAs (its authority, the data requested, its deadline, and its owner) so that the full picture assembled for this audit remains available going forward

Conclusion and Ongoing Improvements

The RAISE Act is a major piece of legislation that is already positively affecting classrooms across the state by providing more teachers and intensive, specialized programming for students in special education, gifted and talented, and English language classes. It is also having a positive effect on students who attend schools in high poverty communities. One of the great conundrums and frustrations to quantifying education initiatives is that the effects are generally only known long after implementation. Student learning is so dependent so on many extraneous factors in addition to direct interventions, that single cause variation is difficult to assess, especially during the implementation. Investments like RAISE, however, lift the entire school and likely lead to substantial and lasting improvements over time.

Though it will take some time to calculate the results, school leaders already believe the cumulative impacts of RAISE will be to lift all students and accelerate student achievement gains across the state.

The ALSDE is grateful for the additional funding and support for our local school systems, and we are excited about the work to building consolidated planning and application models for both school systems and local schools.

The ALSDE is also committed to work with local school systems to improve their parent engagement portals and information gathering.

Finally, the last recommendation of this audit is to keep it going in hopes that this work will carry Alabama's schools into the 2030's stronger than ever:

R12 Institutionalize stakeholder review. Repeat a stakeholder survey on a four-year cycle, including the hours principals, educators, and district staff spend on compliance, and report results through the RAISE Act Review Committee so the time returned to schools is measured. It is recommended to continue to collect data in the last year of each quadrennium.

ADDRESS

50 N RIPLEY STREET
MONTGOMERY, AL 36104

CONTACT

P : 334.694.4900
E : EMACKEY@ALSDE.EDU