

EMIS Change 22-27: Public Comments & Responses

*Please note that names and contact information have been removed from this document.

Comment #1

Sent: Friday, April 30, 2021 1:43 PM

To: EDU EMISPublicComments <EMISPublicComments@education.ohio.gov>

Subject: EMIS Change #22-27, Public Comment

Please see our comments in regards to EMIS Change #22-27.

1. Do not make rule comment deadlines on Saturdays or Sundays. Comments should be due on normal business days.
2. Several of the proposed changes appear to add an additional data collection window. Has the Department considered the level of burden that may put on schools to collect and report another window of data? Were schools consulted about this prior to the proposed change?
3. The updated language strikes out Entitlement and replaces it with Grant - indicating that there may be a definition associated with entitlement programs listed elsewhere. Could the definition not refer to "Entitlement and Grant" programs?
4. Regarding EMIS Change 22-27 - "Why is there no reference to the student not attaining the promotion score here? Is it possible they earn the promotion score on the Third Grade Reading guarantee but are retained anyway if the principal and reading teacher say so?"

From: EDU EMISPublicComments <EMISPublicComments@education.ohio.gov>

Sent: Friday, May 21, 2021 11:31 AM

Subject: RE: EMIS Change #22-27, Public Comment

Good morning,

I have responded to each public comment below. Please note that your comments #1-3 were the same in both emails that you sent, so the responses are the same. Comment #4 is different. Thank you for your interest in EMIS.

1. Do not make rule comment deadlines on Saturdays or Sundays. Comments should be due on normal business days.

Our public comment process is a total of 90 days in length. This schedule includes 30 calendar days for public comments, 30 calendar days for the Department to respond to comments, and then 30 calendar days for the change to be viewed by the public before it is considered "final". Specific dates are documented on the [FY22 EMIS Change webpage](#). The dates for the initial set of changes posted for public comment were derived so the 90 day cycle completed on the last day of the fiscal year and were effective on July 1, 2021.

2. Several of the proposed changes appear to add an additional data collection window. Has the Department considered the level of burden that may put on schools to collect and report another window of data? Were schools consulted about this prior to the proposed change?

The proposed changes referenced do not add additional data collection windows to EMIS. The changes allow districts/community schools to report graduation-related data that currently are only able to be accumulated and reported at year end during other already existing EMIS data collection periods throughout the year. Districts and community schools will not be required to report throughout the year, but will have the ability to do so. This allows for closer to “real time” data reporting by districts/community schools and enables the Department to provide timelier and more accurate progress towards graduations reports and early warning reports. These reports will be especially helpful to districts and community schools when new students enroll during the year.

3. The updated language strikes out Entitlement and replaces it with Grant - indicating that there may be a definition associated with entitlement programs listed elsewhere. Could the definition not refer to "Entitlement and Grant" programs?

This proposed change in the EMIS Manual aligns the terminology with how the ECE grant is now referred to. The referral to 'Entitlement Program' is outdated language. The EMIS change does not change what districts and community schools report.

4. Regarding EMIS Change 22-27 - "Why is there no reference to the student not attaining the promotion score here? Is it possible they earn the promotion score on the Third Grade Reading guarantee but are retained anyway if the principal and reading teacher say so?"

The actual language being added for this change was provided by the business office and aligns with the language in House Bill 409. Though the text being added to the description for option “*” does not specifically reference students who did not meet the promotion score, the text being added to the reporting instructions does: “Report “*” for students who did not meet the regular assessment promotion threshold....”

The decision to retain or promote a student is always up to the district, except for promotions from grade 3 to grade 4. With limited exceptions, the Third Grade Reading Guarantee prohibits students who have not met the requisite reading promotion score from being promoted. However, it does not require that they be promoted if they have met the score. HB 409 is temporarily setting aside the requirement that a grade 3 student meet the reading promotion score and instead leaves it to the district—in particular the principal and reading teacher in conjunction with the tools and data available to them—to determine retention or promotion.

The [Third Grade Reading Guaranteed, Reading Achievement Plans and District Reading Improvement Plans](#) webpage is part of the Reset and Restart information posted on the Department’s website. The page includes links to the language of the bill and the Third Grade Reading Guarantee guidance manual.

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