

## EMIS Change 23-52: Public Comments & Responses

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

### [Response to all public comments](#)

All public comments received the following response:

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

**Sent:** Thursday, June 16, 2022 9:50 AM

Thank you for your interest in EMIS and public comment regarding EMIS change 23-52. The Department has decided to cancel this change for the upcoming 2022-23 school year. They will instead hold focus groups to gather more input before determining how best to move forward with this topic for the 2023-24 school year. Because you have submitted a public comment, you will be invited to participate. They will contact you directly regarding dates and times of focus group opportunities.

Again, thank you for your time and interest in EMIS.

### **Erica Weaston**

Office of Data Quality & Governance

25 South Front Street

Columbus, Ohio 43215-4183

[Erica.Weaston@education.ohio.gov](mailto:Erica.Weaston@education.ohio.gov)

[education.ohio.gov](http://education.ohio.gov)



---

### [Public Comment #1](#)

**From:** redacted

**Sent:** Tuesday, May 3, 2022 9:34 AM

**To:** EDU EMISPublicComments <[EMISPublicComments@education.ohio.gov](mailto:EMISPublicComments@education.ohio.gov)>

**Subject:** New EMIS Code for EL for Preschool

### To Whom It May Concern:

I understand there is consideration for a preschool code for English Learners. Right now, districts are not required to screen or serve English Learners in preschool. In addition, Ohio's screener is not even allowed to be used before kindergarten.

Therefore, there is no reason to add a code and require coding if it is not for funding or for serving students. Districts no longer even have screeners that are applicable

because we were not allowed to continue using them for identification once OELPS was released.

This seems to be an extra task with no purpose or positive outcome for students and should not be added as a requirement.

---

Public Comment #2

**From:** redacted

**Sent:** Tuesday, May 3, 2022 10:19 AM

**To:** EDU EMISPublicComments <[EMISPublicComments@education.ohio.gov](mailto:EMISPublicComments@education.ohio.gov)>

**Subject:** New EMIS Code for EL for Preschool

To whom it may concern:

This is regarding the consideration of a preschool code for English Learners.

Currently, districts are not required to screen preschoolers or serve English Learners in preschool. In addition, Ohio's screener is not allowed to be used before kindergarten. **Therefore, there is no reason to add a code and require coding if it is not for funding or for serving students.**

Additionally, districts no longer have screeners or the funds to purchase screeners that are appropriate for preschool because they were not allowed to continue using them for identification once OELPS was released for K-12.

This seems to be an extra task with no purpose or positive outcome for students and should not be added as a requirement.

---

Public Comment #3

**From:** redacted

**Sent:** Tuesday, May 3, 2022 11:54 AM

**To:** EDU EMISPublicComments <[EMISPublicComments@education.ohio.gov](mailto:EMISPublicComments@education.ohio.gov)>

**Subject:** EMIS code for EL Preschool children

To Whom It may Concern:

Below are some concerns regarding the proposed EMIS code for ELs.

- lack of standardized (across the state) tool to identify ELs at Preschool
- highly questionable validity of standardized tools for children who are this young and especially those who have diverse linguistic and cultural backgrounds

- highly compromised reliability of results of standardized assessments due to the young age of the children and their limited attention span
- the need to complete other preschool assessments and over-testing young children
- the purpose of completing the assessments does not seem to "benefit" the students and families as no additional funding or services must be provided
- the best environment for language developments is a strong preschool program and no additional language interventions are required at this age
- parent of ELs are not typically aware of these changes and/or do not have the language and other cultural resources to advocate for their children's rights because of that the department has the responsibility to find the least intrusive way to account for the number of children with diverse background in place of a questionable standardized assessment
- limited and precious resources will need to be allocated to unnecessary testing vs much needed instruction
- due to the lack of legal guidelines about teacher-student ratios, ESL resources across districts are typically very limited and in many case very discrepant between districts with a large advantage for districts representing affluent communities; this practice will further exacerbate the financial and other inequalities between districts and impacted students
- any practice (assessment or instruction) for marginalized student groups promoted by the department needs to be examined against a strong criteria regarding the validity of the practice as well as outcomes for these already vulnerable subgroups

This is not an exhaustive list and I am sure other colleagues could add to it. In summary, in my professional and personal view this proposed change does not serve the EL community in a positive way.

If the goal is to determine the change in demographic characteristics and language/cultural background of students/families, potentially other forms to evaluate the question could be implemented.

Happy to address/discuss these concerns in a conversation if possible and helpful.



[Public Comment #4](#)

**From:** redacted

**Sent:** Wednesday, May 4, 2022 4:34 PM

**To:** EDU EMISPublicComments <[EMISPublicComments@education.ohio.gov](mailto:EMISPublicComments@education.ohio.gov)>

**Subject:** Preschool Screening of English Learners

To Whom It May Concern,

We were informed of the proposed EMIS code for Preschool English Learners and feel that this change would not serve the dual language learners in our preschools well to give them another assessment when instruction is not compulsory and they are already assessed disproportionately more than other subgroups. Additionally, this would be a tremendous undue burden on Ohio school districts whose budgets are already established for next year. Not to mention the lack of staff that already exists in our districts due to national shortages. This is not the time to be asking schools to complete additional tasks when the existing, mandated tasks are hard enough to complete.

There are other ways in which to obtain the data and information EMIS is asking for other than taking instructional time from students. Please reconsider asking district to implement these additional assessments for our dual language learners.

Thank you!

.....

[Public Comment #5](#)

**From:** redacted

**Sent:** Thursday, May 5, 2022 12:00 PM

**To:** EDU EMISPublicComments <[EMISPublicComments@education.ohio.gov](mailto:EMISPublicComments@education.ohio.gov)>

**Subject:** Proposal to screen PK for LEP status - feedback

Please reconsider the upcoming requirement for districts to screen PK students for LEP status. We enroll several hundred PK students each year in CPS. This potential unfunded mandate would cause us to lose services for ELs in grades K-12 because our dollars can only stretch so far. As a district and a state, we must focus more on helping high school newcomers/SLIFE students meet graduation requirements, not add mandates to a population of ELs for whom the data shows we are successful.

Additionally, adding yet another assessment for a PK student jeopardizes instructional time and provides a negative entry to school for students who are already over-tested.

Please reconsider this proposal.

---

[Public Comment #6](#)

**From:** redacted

**Sent:** Friday, May 6, 2022 8:29 AM

**To:** EDU EMISPublicComments <[EMISPublicComments@education.ohio.gov](mailto:EMISPublicComments@education.ohio.gov)>

**Subject:** Preschool mandate for EL's

To whom it may concern,

It is my opinion that you should reconsider the mandate that starting in August, all preschool-aged students who qualify as determined by the LUS, must be assessed for English Language Proficiency. There is already a great deal of testing for preschool and EL students, staffing shortages are larger than ever with no relief in site (this is a national crisis), this will be another additional cost to districts who will have to find monetary resources and adjust budgets.

---

[Public Comment #7](#)

**From:** redacted

**Sent:** Monday, May 9, 2022 4:57 PM

**To:** EDU EMISPublicComments <[EMISPublicComments@education.ohio.gov](mailto:EMISPublicComments@education.ohio.gov)>

**Subject:** Screening PK ESL students

Please reconsider this proposal

Young children do not need 1 more test!

These funds can be put to better use for current EL's!

---

[Public Comment #8](#)

**From:** redacted

**Sent:** Monday, May 9, 2022 6:51 PM

**To:** EDU EMISPublicComments <[EMISPublicComments@education.ohio.gov](mailto:EMISPublicComments@education.ohio.gov)>

**Subject:** Provide us funding to test and serve or stop the requirement!

*"Please reconsider the upcoming requirement for districts to screen PK students for LEP status. We enroll several hundred PK students each year in CPS. This potential unfunded mandate would cause us to lose services for ELs in grades K-12 because our dollars can only stretch so far. As a district and a state, we must focus more on helping high school newcomers/SLIFE students meet graduation requirements, not add mandates to a population of ELs for whom the data shows we are successful."*

*Additionally, adding yet another assessment for a PK student jeopardizes instructional time and provides a negative entry to school for students who are already over-tested.*

*Please reconsider this proposal."*

---

[Public Comment #9](#)

**From:** redacted

**Sent:** Tuesday, May 10, 2022 7:41 AM

**To:** EDU EMISPublicComments <[EMISPublicComments@education.ohio.gov](mailto:EMISPublicComments@education.ohio.gov)>

**Subject:** PK ELLs

Please reconsider the upcoming requirement for districts to screen PK students for LEP status. We enroll several hundred PK students each year in Cincinnati Public Schools. This potential unfunded mandate would cause us to lose services for ELs in grades K-12 because our dollars can only stretch so far. As a district and a state, we must focus more on helping high school newcomers/SLIFE students meet graduation requirements, not add mandates to a population of ELs for whom the data shows we are successful.

Additionally, adding yet another assessment for a PK student jeopardizes instructional time and provides a negative entry to school for students who are already over-tested.

Please reconsider this proposal.

---

[Public Comment #10](#)

**From:** redacted

**Sent:** Tuesday, May 10, 2022 8:00 AM

**To:** EDU EMISPublicComments <[EMISPublicComments@education.ohio.gov](mailto:EMISPublicComments@education.ohio.gov)>

**Subject:** Requirement to screen PKs for EL status

Please reconsider changing the requirement to screen PKs for EL status. While PKs will have clarification through identification, they will not be serviced and time for K-12 teachers will be depleted by spending time with these tests.

PKs and the lower grades are learning fundamentals alongside their peers who have just started their education journey, these students will be more likely to grow quickly and rapidly in their English development. Additionally, testing at this age proves to be not as accurate because the child has never experienced testing before.

Please reconsider the proposal.

---

[Public Comment #11](#)

**From:** redacted

**Sent:** Tuesday, May 10, 2022 11:58 AM

**To:** EDU EMISPublicComments <[EMISPublicComments@education.ohio.gov](mailto:EMISPublicComments@education.ohio.gov)>

**Subject:** EMIS Change 23-52, Public Comment

Hello!

I work for Hamilton County ESC in several local districts in the Cincinnati area. I am concerned about where this new code leads: will we soon be required to purchase screeners for 3- and 4- year-old children, identify, and serve them- all without funding?

At the PreK age, all students are language learners; to me, it makes sense to allow our highly-trained PreK teachers do the great job they do and leave the identification to the following year.

---

[Public Comment #12](#)

**From:** redacted

**Sent:** Wednesday, May 11, 2022 10:50 AM

**To:** EDU EMISPublicComments <[EMISPublicComments@education.ohio.gov](mailto:EMISPublicComments@education.ohio.gov)>

**Subject:** Proposed EMIS Change for Screening and Reporting PK ELs

Hello,

I respectfully request that EMIS leadership reconsider the upcoming requirement for districts to screen PK students for LEP status. Cincinnati Public Schools enrolls several hundred of PK students each year. The time that it takes to screen hundreds of students would take weeks of instruction away from our school age ELs. Additionally, as the ODE mandated language proficiency screener is not approved for PK students, this unfunded mandate would require districts to spend their limited funds on purchasing a commercial screener. This additional cost would once again limit districts' ability to effectively serve their school age ELs. Additionally, data suggests that our ELs that start US schools in preschool are one of the more successful demographics in achieving English and academic proficiency. Conversely, our high school SLIFE and newcomer ELs consistently struggle to achieve English and academic proficiency, and to graduate. Therefore, as a district and a state, we must focus more on helping high school SLIFE/newcomer ELs acquire English and meet graduation requirements, and not add mandates to a population of ELs for whom the data shows we are successful.

Additionally, adding yet another assessment for PK students jeopardizes their instructional time and provides a negative entry to school for students who are already over-tested.

Please reconsider this proposal.

---

[Public Comment #13](#)

**From:** redacted

**Sent:** Tuesday, May 17, 2022 8:28 PM

**To:** EDU EMISPublicComments <[EMISPublicComments@education.ohio.gov](mailto:EMISPublicComments@education.ohio.gov)>

**Subject:** EMIS Change 23-52, Public Comment

At this time, schools are not required to screen pre-school students for EL. While there is a strong emphasis on literacy in pre-school, this additional screener would cause substantial work and would require duplicate work as an additional screener is Mandated in Kindergarten. Why would we be required to screen in Pre-school and then screen again in Kindergarten? It just seems like a lot of extra work that is not required.

.....

[Public Comment #14](#)

**From:** redacted

**Sent:** Wednesday, May 18, 2022 1:27 PM

**To:** EDU EMISPublicComments <[EMISPublicComments@education.ohio.gov](mailto:EMISPublicComments@education.ohio.gov)>

**Subject:** EMIS Change 23-52, Public Comment

To Whom it may concern:

As I understand the proposed language in EMIS Change 23-52 Reporting of PS EL Students, districts would be required to screen PreK students (although not required to provide services). While I am a firm believer in the value of PreK access and early literacy/language development, this proposal appears to be little more than an "extra step" at the expense of precious time and capacity.

The states current identification screener is provided for students in grades K-12. This change would require districts to purchase a local screener to use for these young students, assess them, and then determine whether or not they would provide services. Additionally, districts would be asked to assess these students AGAIN when they enter KG and are age appropriate to take the OELPS .

Currently, districts provide language background for PreK students (information gathered from the Language Usage Survey at enrollment), calling attention to needs for multilingual supports for PreK families and also helping districts to identify which PreK students should be screened when transitioning to KG. In the current structure, districts can then provide consulting, training, and support to PreK staff based on the range of home language backgrounds.

I strongly urge you to reconsider this proposed change in EMIS reporting and allow us to continue the supports for PK students as they currently stand.

Thank you for your time,



---

[Public Comment #15](#)

**From:** redacted

**Sent:** Wednesday, May 18, 2022 2:13 PM

**To:** EDU EMISPublicComments <[EMISPublicComments@education.ohio.gov](mailto:EMISPublicComments@education.ohio.gov)>

**Subject:** EMIS Change 23-52, Public Comment

To Whom it May Concern,

As the English Learner Coordinator at the ESC of Central Ohio, I wish to submit comments on the proposed change to EMIS reporting.

The change would require districts to assess or screen potential English learners in their preschools and, if they qualify, code the students as ELs in EMIS. There certainly is value in identifying our youngest English learners and providing services to help the students acquire English in a timely manner in order to succeed once they enter kindergarten.

However, I feel that the change puts a burden on many of Ohio's larger school districts as well as the possibility of misidentifying and labeling students as ELs.

Young children are dual language learners in that they are acquiring both languages from 0 – 5 years. They are still learning the home language, say Spanish, while acquiring English at preschool. During that process, there may be code switching or slight delays as their brains develop two separate channels for Spanish and English. This may result in over identification of English learners. To screen preschoolers would involve the purchase of a vendor assessment and a considerable amount of time administering the assessments. In addition, districts lack to capacity to provide direct services to preschools.

Secondly, school districts are already extremely busy at the beginning of any school year screening incoming kindergarten students, and transfer students to their districts with the OELPS. OELPS is time consuming as it is given individually. It often takes weeks to screen all the new students to determine who qualifies. This is time that is not spent on instruction.

Currently, most districts don't screen preschoolers to identify English learners. However, they do provide support for the teachers on best practices. Preschools are a language-rich environment as all children are learning English, even native speakers. I would suggest that providing more resources to preschool teachers would be more effective and fairer all round. One page factsheets on various topics, videos showing effective read alouds and information on language acquisition would be most useful.

Thank you for your consideration of my feedback.

---

[Public Comment #16](#)

**From:** redacted

**Sent:** Friday, May 20, 2022 9:59 AM

**To:** EDU EMISPublicComments <[EMISPublicComments@education.ohio.gov](mailto:EMISPublicComments@education.ohio.gov)>

**Subject:** EMIS Change 23-52, Public Comment

*According to the proposed language, districts would be required to screen PreK students with a new, district-funded vendor assessment as the OELPS isn't available for PreK screening. School districts, however, would not be required to provide EL services, nor would districts receive additional funding for identified PreK students.*

*At HCSD, we currently provide our PreK students with individually and developmentally appropriate language and literacy instruction based on assessments already in place. Specifically, information gathered on the Language Usage Survey (LUS) informs instructional practices in PreK classrooms and the transition process to kindergarten.*

*Updating the reporting of preschool English learners wouldn't provide any clear benefit to the students or families we serve. It would, however, add unnecessarily cumbersome requirements to already overburdened school districts. Therefore, I would appeal to the Ohio Department of Education to reconsider this proposed change.*

---

### Public Comment #17

**From:** redacted

**Sent:** Wednesday, May 25, 2022 11:40 PM

**To:** EDU EMISPublicComments <[EMISPublicComments@education.ohio.gov](mailto:EMISPublicComments@education.ohio.gov)>

**Subject:** EMIS Change 23-52, Public Comment

Hello,

As I understand the proposed language, districts would be required to screen PreK students (although not required to provide services)... but then AGAIN screen them with the OELPS when they enter KG. While I am a firm believer in the value of PreK access and early literacy/language development, this proposal appears to be little more than an "extra step" at the expense of precious time and capacity.

Instead, districts could provide language background for PreK students (information gathered at enrollment), calling attention to needs for multilingual supports for PreK families and also helping districts to identify which PreK students should be screened when transitioning to KG. Districts can then provide consulting, training, and support to PreK staff based on the range of home language backgrounds.