

EMIS Change 23-94: Public Comments & Responses

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

Public Comments 1-3 & 5-9 received the following response:

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

Sent: Tuesday, July 5, 2022 1:48 PM

To: redacted

Subject: RE: EMIS Change 23-94, Public Comment

Thank you for your interest in EMIS and public comment regarding EMIS change 23-94. Your concerns were shared with leaders at the Department charged with developing the policy and requirements associated with this new data collection.

Ohio's education system is dedicated to ensuring that each child is challenged to discover and learn, prepared to pursue a fulfilling post-high school path, and empowered to become a resilient, lifelong learner who contributes to society. To better understand what those post-high school paths of students are, the general assembly and the Ohio Department of Education developed the new exiting student follow-up collection to meet requirements in state and federal law.

Ohio Revised Code [3302.03 \(D\)\(2\)\(f\)](#) now requires the Department to include report-only post-graduate outcomes on district and school report cards for students who earn diplomas in the prior year. For years, many districts have followed up with exiting Career-Technical Education students and students with disabilities. This new data collection builds one seamless approach for reporting the post-high school outcomes for all students. It replaces the currently independent collections (Ohio Longitudinal Transition Study survey and the Career-Technical Education Workforce Development Follow-up) that have historically taken place for these groups.

The new data collection will start in October and close the following summer, which will give districts as much time as possible to reach students and report results. The collection will also offer a data appeal window afterward, to help districts ensure data is reported as accurately and completely as possible.

The Department is currently working on resources to help districts. [Here are a few ideas to help you get started](#), including a [sample student exit survey](#). Additional information on the reporting requirements and supports from the Department will be published in the fall before the collection begins. Information on exiting students will be shared on the report card published in the fall of 2023.

Also, please be assured that the Department is working closely with a variety of state and other systems to find ways to reduce the data reporting burden for districts. Where possible, the Department will seek information from other sources on employment and education and include that information.

Overall, by better understanding what Ohio's students go on to do after high school, we as an educational community can help guide students toward fulfilling, sustainable post-high school paths.

Erica Weaston

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[Public Comment 4 received the following response:](#)

From: EDU EMISPublicComments <EMISPublicComments@education.ohio.gov>
Sent: Tuesday, July 5, 2022 1:54 PM
To: redacted
Subject: RE: EMIS Change 23-94, Public Comment

Thank you for your interest in EMIS and public comment regarding EMIS change 23-94.

Regarding your questions about Employment Typical Hours Per Week, the reporting instructions indicate: "Report the option for the hour ranges listed. If the former student had different jobs at different times during the year, report the option that represents a position held for 90 days or more. If multiple positions were held for 90 days or more, report the position with the most hours. If the former student is working multiple jobs simultaneously, the hours for those jobs may be combined for this element."

Do the instructions help to answer your questions? If not, please clarify or provide an example scenario so that I can more specifically address your needs.

Thank you,

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Public Comments

Please note this includes only comments received by the June 13, 2022 deadline.

[Public Comment #1](#)

From: redacted

Sent: Tuesday, June 7, 2022 8:24 AM

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

Subject: 23-94 NEW EXITING STUDENT FOLLOW-UP RECORD AND COLLECTION

As an EMIS coordinator, I think this information will be next to impossible to collect. We have already collected all contact information, but we have over 275 graduates. This collection will end up being a tremendous waste of valuable resources. With all of the EMIS changes for Seniors, especially SEALS, that are expected in 22-23 there is a huge lack of manpower available to collect the information. Schools do not have extra employees to facilitate this collection. The amount of information that is "required" is truly no one's business and some of the students have already made that comment.

Also, if the FFE is required for reporting, this will take me a HUGE amount of time. FFE requires me to enter information for one student at a time with a drop down field for each question. As the EMIS coordinator (3000 students) and Benefits Coordinator (400 staff), I am already swamped at this time of year. It feels like the additional reporting for 22-23 has added a tremendous amount of work to EMIS coordinators workloads with no consideration by anyone. I have never complained or felt it necessary to comment on any new collection, but this one just doesn't make any sense and is guaranteed to fail. There needs to be some serious thought into this collection by ODE. At the very least, we need to be able to download information into the data collector by using an excel spreadsheet and NOT the flat file editor.

[Public Comment #2](#)

From: redacted

Sent: Friday, June 3, 2022 3:56 PM

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

Subject: EMIS Change 23-94, Public Comment

I am extremely concerned about the update to the report card law (ORC 3302.03(D)(2)(f) that requires districts to include graduate outcomes for students who earn diplomas in the prior year. We are a district that graduates approximately 1600 students each year.

To think it is possible or even plausible to reach out to each of them, in a district with a high mobility rate is not realistic. Our staff is already taxed with the myriad reporting requirements without having to comply with the most recent update.

Is the State planning to provide support on a tool that helps collect the information being requested or is the expectation that each district figure it out on their own as we are asked to do with most unfunded mandates? Without some type of tool to help with this, we will be left to manually enter this data if we can even manage to get the information.

Who is responsible for reaching out to graduates, collecting the data, and inputting the data? Is the state providing funding to hire staff that will assist in contacting our graduates, inputting their data (if they manage to find them), and then sending it to EMIS for reporting purposes? We don't have the staff to handle this type of workload.

In short, I think this is an ask that will further tax schools and districts, especially large districts, pulling essential staff from work that actually matters and improves conditions for teaching and learning. I hope that the decision-makers take a moment to think what this change means in practice and reconsiders their positions.

Thank you for the opportunity to provide public comments on this matter.



[Public Comment #3](#)

From: redacted
Sent: Thursday, May 19, 2022 10:37 AM
To: EDU EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change 23-94, Public Comment

I just don't know how this will be accurate data. We may not be able to contact all of our past grads and if we do how do we know if they are doing what they say they are...

I think that this will not be good data.



[Public Comment #4](#)

From: redacted
Sent: Tuesday, May 17, 2022 3:23 PM
To: EDU EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change 23-94, Public Comment

In reference to the element of Employment Typical Hours Per Week, in the reporting instructions can you please clarify the following:

If multiple positions were held for 90 days or more (does that mean at different time periods after graduation)

and

If the student is working multiple jobs simultaneously (does that mean at different times or days during the same time period or at the same day and time)

Thank you

[Public Comment #5](#)

From: redacted

Sent: Tuesday, May 17, 2022 1:00 PM

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

Subject: EMIS Change 23-94, Public Comment

Public schools should not be held responsible for what the students do up to a year after graduation. Public education is available for all and students have the CHOICE to do whatever they want POST Graduation and the K-12 school cannot impact that once they take their diploma.

Exactly how will ODE or the govt use this information? Seems like just another law made by bureaucrats to collect information with no end use in sight.

[Public Comment #6](#)

From: redacted

Sent: Tuesday, May 17, 2022 9:43 AM

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

Subject: EMIS Change 23-94, Public Comment

This follow-up requirement is an undue burden on school districts. To continually ask more of our districts in regard to reporting and follow-up is ridiculous. There is no guarantee that we can track down all of our graduates as they go to school, start to work, or enter the military and to suggest that we must is a farce. This should not be required. I don't have an issue with reporting what we can, but demanding we do this doesn't make sense.

[Public Comment #7](#)

From: redacted

Sent: Monday, May 16, 2022 7:36 AM

To: EDU EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change 23-94, Public Comment

Good morning,

I believe that this is a prohibitive amount of work to ask of districts. It will require a great deal of time to follow up with students and collect this amount of data. Also, we were initially told that we would need to collect data on which of 4 areas a student is active: college, military, work, and/or apprenticeship. Now there are many more questions to ask, especially for students with a disability.

Unless the government is also going to give districts money to hire someone to manage all of this, it does not seem likely that districts, already stretched thin, will have the resources to do this.

In addition, finding students in transient districts will be especially difficult. Although students almost always have a phone on them, they do not always keep the same number. They usually don't use email. And if we are able to reach them, in this day of spam and phishing, they are likely to think that clicking on a link we send them will be dangerous, no matter how many times we may have told them this was coming (and we didn't have a lot of time to do so).

Even though it is a data point on the report card and does not determine funding, it will make high stakes districts look bad to not have good response rates.

I think the legislature should rethink this unfunded mandate.

Thank you for your time,

[Public Comment #8](#)

From: redacted
Sent: Thursday, June 9, 2022 2:10 PM
To: EDU EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change 23-94, Public Comment

The process of keeping up-to-date contact information accurate on our 'mobile' clientele is already a huge task. Oftentimes, we won't get phone calls returned or receive responses that aren't appropriate. Parents/Students continually respond with 'it's none of your business' and hang up. That's if we can reach them with a valid number. The New Follow-Up Collection creates an excessive burden on districts. This new law came late in the school year where districts were focused on graduation and current end of year processing for data reporting requirements. Gathering this information for the current 21/22 school grads was not attainable based on the timing. Might I suggest starting the data collection for the 22/23 school year.

The amount of time it takes to gather this data and report it to the state takes away valuable time from our daily tasks that must be attended to for the basic needs of our students. Adding additional burden to this work will only add additional strain to our already overloaded staff by focusing our time on the past and putting the present on "pause". Please reconsider adding

these extra elements.

[Public Comment #9](#)

From: redacted

Sent: Monday, June 6, 2022 11:16 AM

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

Subject: Public Comment

To Whom it May Concern,

I am concerned about the tracking of the information of seniors after they graduate. We have been doing a senior survey for years and we often have students who do not want to give us their information to be able to contact them at a later date. They should have the right to not have to provide us that information.

This is one more burden to put on counselors, administrators, and EMIS coordinators who are already spread thin with the CURRENT students. I understand why this information is useful, however, I don't see how this will be able to be done with any fidelity.

Students should be able to graduate and not have to be tracked down at a later date for information. I know how difficult it will be in my small district, I can't imagine what this will look like in a large, urban, transient district.