

EMIS Change 26-67: Public Comments & Responses

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

Public Comment #1

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

Sent: Monday, June 16, 2025 9:48 AM

Subject: RE: Student Detail Attendance record

Good morning,

Thank you for your public comment and interest in EMIS. Using this new record type is optional at this time, so if your district wants to keep the same reporting you have now, then you do not have to make any updates.

Additionally, this change, if the optional reporting is done, will make it easier for districts to evaluate their data (save both time and avoid errors) because an upcoming enhancement to the Data Collector will allow districts to see which individual records change from one submission to the next. This functionality will enable accidental errors to be addressed earlier in the submission process, for example. If this new optional record is not used, then districts will not be able to easily identify enrollment changes from one submission to the next.

At this time, more detailed attendance codes are not required. This new record type will make it easier, however, if those codes are required in the future.

I hope this helps to explain.

Thanks,

Erica Weaston

IT Project Manager

Office of Data Quality & Governance

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Erica.Weaston@education.ohio.gov



**Department of
Education &
Workforce**

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Sent: Friday, May 16, 2025 12:32 PM

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

Subject: Student Detail Attendance record

Good Morning,

I am writing to address concerns on the proposal to move attendance reporting to a new record.

Akron currently has numerous dashboards and student level risk reports that point at the EMIS FS download records.

We had created reports years ago that have the HB410 status and attendance rate for every student. We have dashboards and reports that look at chronic absenteeism and that examine attendance codes.

This decision means that APS staff must update our reports and dashboards. It also means that every school district in Ohio will need to update THEIR reports. We will also need to update our validation tables for attendance codes so that they crosswalk to the state code equivalent. This means that the technology team will not be able to focus on other initiatives to support our districts.

Additionally, all the SIS vendors will need to update their state reporting software. The vendors will increase the cost of their software in order to pay for that work and that expense will be passed back to the District and to taxpayers.

Please consider if the value that this data will bring to EMIS is worth the cost.

[Public Comment #2](#)

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

Sent: Monday, June 16, 2025 9:49 AM

Subject: RE: EMIS Change 26-67

Good morning,

Thank you for your public comment and interest in EMIS. This EMIS change does not change how districts are currently tracking or entering data into their local student software. It is just a change in formatting in how the data comes in. It will make it easier for districts to evaluate their data (save both time and avoid errors) because an upcoming enhancement to the Data Collector will allow districts to see which individual records change from one submission to the next.

Also please note that using this new record type is optional at this time, so if your district wants to keep the same reporting you have now, then you do not have to make any updates.

Regarding the AT question, I would recommend you reach out to your local software vendor to inquire about default value setting.

Thanks,

Erica Weaston

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Sent: Wednesday, June 11, 2025 2:32 PM

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

Subject: EMIS Change 26-67

I am opposed to this proposed "process improvement". I believe it will add more burden to attendance personnel.

HB410 requires that we address truancy. Districts track absences, make phone calls, send letters and hold truancy plan meetings in an attempt to curb attendance issues. Beyond the plan meeting, the local juvenile courts are overwhelmed with other more significant cases, and therefore do not pursue holding parents accountable when districts have to go the next step. The few truancy cases that are moved through the court system end up with the parent getting a slap on the wrist and their court fees waived. Tracking and addressing truancy is already a discouraging business. Adding a requirement to track "in attendance" on a daily basis seems to be unnecessary. Our system is set up to report when a student is absent. If they are not marked absent, they are in attendance. Why the need to report what is obvious? The state already knows how many hours a student could attend per our district calendar. The state also already sees the absence hours.

Additionally, what other types of reporting will be expected with tracking days in attendance. Certainly something must be expected down the road.

Lastly, will districts be permitted to have "AT - in attendance" set as a default for our daily absence/attendance record? If not, that indicates the additional work involved for personnel to enter "AT" for every attending student in the district every day of school. If so, that may at least cut down on the data entry involved. Either way, the daily attendance list will become so convoluted with at least one entry per day, and in many cases more than one per day for every student who comes late, leaves early, and sometimes does both in the same day.

I'd like to know how this additional reporting will benefit school districts. I don't see how this constitutes a process improvement. I see additional work.

Public Comment #3

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

Sent: Monday, June 16, 2025 9:49 AM

Subject: RE: EMIS change 26-67

Good morning,

Thank you for your public comment and interest in EMIS. I have addressed a few points in red text below, as I am not sure the reporting is currently being completed accurately.

The documentation for this new record does not provide any guidance regarding medical absences that are exempt from House Bill 410 counts. **The optional change at this point does not have any codes to address the reason for an absence.** Because District policies can decide whether these are excused or exempt, detailed guidance regarding these absences should be included in the FM description. **Determinations on if a specific absence is exempted or not is beyond the scope of EMIS reporting- once the district makes that determination, the absence is counted in the appropriate category for EMIS reporting.** Should the attendance type include an option for medical? **We will not add just one category of absence at this time, but if the law instructs us to add categories, I am fairly confident that various medical categories would be included.** Is it going to cause a fatal error when the dates of enrollment matched with calendar hours don't add up to hours in attendance or absent because there isn't an option for medical? **Two answers to this question. There is not currently a check to compare calendars and reported attendance for several reasons. However, even if we add a check, then a medical absence is still an absence, and would still be reported in the current totals or in some future subset of categories. Just because a type of absence is not considered/exempted for HB410 purposes does not mean that it is not reported in EMIS attendance totals. Or will it just cause troubleshooting errors for students with medically exempt absences? Again, those absences are only exempted from HB410 totals. They still are reported as absences in EMIS, and still count towards chronic absenteeism and other measures.** It would create a great deal of work to track down students with this type of absence if District policy says the absences are exempt. **See previous comments. If you are not including those as absence hours in EMIS reporting, then your reporting is not correct.**

[This DEW web page](#) says, "A student cannot be considered excessively absent or habitually truant for medically related absences. Schools and districts can work with families to monitor the student's absences that are a result of the identified medical condition. Students would not be referred to the absence intervention team to develop and complete a plan for absences due to documented illness or absences related to the illness. Further, a student would not be referred to court for medical-related absences. Schools and districts have discretion through their local policies to tailor their approaches to attendance, absences, and truancy to the unique needs of their student populations." This would be a situation where the absence would likely be marked as exempt. How would these be reported in the FM? FM080 would be AB, but there is not a current option for FM070. EX would count towards HB410 and AT/UN would not be applicable. **The calculations for HB410 are different from what is reported in EMIS.**

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Sent: Friday, May 16, 2025 4:09 PM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS change 26-67

The documentation for this new record does not provide any guidance regarding medical absences that are exempt from House Bill 410 counts. Because District policies can decide whether these are excused or exempt, detailed guidance regarding these absences should be included in the FM description. Should the attendance type include an option for medical? Is it going to cause a fatal error when the dates of enrollment matched with calendar hours don't add up to hours in attendance or absent because there isn't an option for medical? Or will it just cause troubleshooting errors for students with medically exempt absences? It would create a great deal of work to track down students with this type of absence if District policy says the absences are exempt.

[This DEW web page](#) says, "A student cannot be considered excessively absent or habitually truant for medically related absences. Schools and districts can work with families to monitor the student's absences that are a result of the identified medical condition. Students would not be referred to the absence intervention team to develop and complete a plan for absences due to documented illness or absences related to the illness. Further, a student would not be referred to court for medical-related absences. Schools and districts have discretion through their local policies to tailor their approaches to attendance, absences, and truancy to the unique needs of their student populations." This would be a situation where the absence would likely be marked as exempt. How would these be reported in the FM? FM080 would be AB, but there is not a current option for FM070. EX would count towards HB410 and AT/UN would not be applicable.

Please provide more information on how to report these exempt absences. Student Information Systems will need this level of detail to be able to make sure reporting will be accurate.

[Public Comment #4](#)

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

Sent: Tuesday, June 17, 2025 8:03 AM

Subject: RE: EMIS Change 26-67

Good morning,

Thank you for your public comment and interest in EMIS. I have requested an example from our EMIS team and will provide that to you when I get it. In the meantime, I recommend your software vendor reach out directly to our team with questions. They should be aware of who to contact, but just in case, they should email the EMIS Inbox (EMIS@education.ohio.gov), David Ehle (David.Ehle@education.ohio.gov) and me (Erica.Weaston@education.ohio.gov). They can also attend our monthly EMIS change vendor call and ask questions in that forum. Our next meeting will be July or August.

Thank you,

Erica Weaston

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Sent: Wednesday, June 11, 2025 2:29 PM

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

Subject: EMIS Change 26-67

Please provide real-world examples of what typical FM records would look like in the submission file. I'm having trouble visualizing it and our software vendor is as well.