EMIS Change 27-3: Public Comments & Response

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

EMIS Response to Comments

Thank you for your interest in EMIS and EMIS reporting. Thank you also for taking the time to submit a public comment regarding EMIS Change 27-3, which adds the Staff Vacancy (CR) Record to EMIS reporting. This reporting is required by Ohio Revised Code Section 3301.82. Since we are required to collect this data, we are moving forward with this change and this new record.

Given the clear interest in this change, we are providing this comprehensive response to all comments received. Key words are bolded in the response below to help you quickly find the topic(s) about which you commented in the event you don't care to read through the entire response. The responses here are from the EMIS office. All comments have been forwarded to the relevant business office. If they have additional questions about or responses to the received public comments, they will reach out directly.

Please note that an **update to this change document** was posted on June 10. That update rectified some wording that commentors found confusing ("personnel" vs "staff member") and corrected the name of the record in one place. It also added reporting guidance for those positions that do not legally require any kind of certificate or license. Finally, an FAQ section was added to assist districts with this reporting.

An additional update to the Answer for Question 5 is planned. That updated answer is meant to address a comment we received about having multiple similar positions vacant that remain unfilled. The Q/A in the June 10 update only directly addresses a situation where there are two such positions. The update will clarify reporting when there are more than two identical positions vacant and unfilled.

A **Position Code** for EMIS Coordinators will not be added. Position Code option 113–Coordinator Assignment is already available for reporting.

The **Subject Area** (CR080) reporting was designed to collect the information commonly considered by those who review, study, and use such vacancy data. The breakdown into subject areas also took licensure requirements into consideration. We have an option for both music and art (see FA–Fine Arts). We have another option that includes PE (see HP–Health and physical education). There are also three options for the sciences, which separate this subject into the most logical and useful groupings (see SC–Science: Chemistry, SL–Science: Life Science, and SP–Science: Physics). It was determined that these options will capture the necessary information. Additional options to break all of these out separately are not currently being considered.

For **Reason for Vacancy**, there is no need to break that out further as it is possible to find more detailed information via the connected Staff Employment (CK) Records.

This reporting will **begin with FY27** reporting. Begin reporting with vacancies the district plans to fill for FY27.

Currently, there is no requirement or plan for this data to appear on the **report card**. Reporting vacancy data is, however, required. It will appear in some manner on the website. Details of this are yet to be finalized.

The **consequences** of not reporting this data are the same as with all EMIS data: districts would be out of compliance with legally mandated reporting. We cannot speak directly to other specific consequences as we do not know what the future may bring in terms of the many potential uses of this data.

"Double-checking" whether contracted districts are correctly reporting their **contracted staff** is not the purpose of this record. The data included on this record does not make such checks possible. Note that contracting districts should not be reporting "duplicate" data in an effort to report data that contracted districts are not reporting. Districts should work together in contracted situations to ensure proper reporting.

We have no plans to collect **number of applications** received for each vacancy reported. This information is not required by law and would place a greater burden on districts.

Districts/schools will report only their own staff, including staff that they employ but contract out to other districts/schools. If they are a **fiscal agent** for another entity, the vacancies at that other entity should not be reported, assuming those are staff that are not otherwise reported to EMIS. In other words, districts should report vacancies for positions they would normally report to EMIS.

Comment #1

Sent: Monday, May 18, 2026 9:02 AM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change

I would like to provide comment on 27-3, the Staff Vacancy Record.

This will be redundant reporting as all staff records already show the reason for leaving by position code and stop/termination date. New staff are already reported by start date to show that they are new. This information should already show what position codes were left unfilled from one year to the next. If 5 teacher 230 position codes had termination dates of 7/31, and only 3 teacher position codes had start dates of 8/1 for the consecutive year, that should show that 2 positions were eliminated or unfilled. If the purpose is to see the difference between eliminated vs unfilled, there should be an easier way to update the position entry reporting that already exists, rather than creating additional, duplicate reporting.

Comment #2

Sent: Monday, May 18, 2026 9:18 AM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change-27-3

27-3
Staff/Course

TBD Please consider not requiring reporting through entry into USPS for every vacancy, filled or unfilled, every year. Our main concern is this is duplicate and redundant reporting.

Comment #3

Sent: Monday, May 18, 2026 9:23 AM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change

I would encourage reconsideration of this reporting requirement, as vacancy tracking is already managed internally by districts through established staffing systems and spreadsheets. Requiring districts to separately report every staff vacancy to the state creates an additional administrative burden without providing meaningful operational value at the local level.

For districts experiencing significant turnover, this requirement is especially unrealistic. Our current attrition rates are approximately 10% for certified staff and 23% for classified staff. With vacancy activity at that level, reporting every open position through an additional state collection process would create substantial duplicate work for HR departments that are already managing high-volume recruitment, onboarding, and retention efforts.

Districts are already tracking this information closely because staffing vacancies directly impact daily operations. Adding another layer of state reporting does not improve local decision-making; it simply diverts limited time and resources away from critical staffing functions.

At a time when public schools are facing ongoing staffing shortages and financial constraints, state efforts would be better focused on addressing the school funding formula and providing meaningful support to districts, rather than adding new administrative compliance requirements that increase workload without clear benefit.

Comment #4

Sent: Monday, May 18, 2026 9:44 AM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change-27-3

27-3
Staff/Course
TBD Please consider not requiring reporting through entry into USPS for every vacancy, filled or unfilled, every year. Our main concern is this is duplicate and redundant reporting.

Comment #5

Sent: Monday, May 18, 2026 9:51 AM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: Emis Change-27-3

27-3
Staff/Course

TBD Please consider not requiring reporting through entry into USPS for every vacancy, filled or unfilled, every year. Our main concern is this is duplicate and redundant reporting.

Comment #6

Sent: Monday, May 18, 2026 10:51 AM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change 27-3

Good morning,
I am writing to provide public comment regarding EMIS Change 27-3, which proposes the addition of the Staff Vacancy (CR) Record collection.

While I understand the Department's interest in gathering staffing shortage data, this proposed collection appears highly redundant and creates a substantial additional reporting burden for districts without providing meaningful new information that is not already available through existing EMIS collections and state systems.

Much of the proposed data is already collected through current EMIS staff reporting, credentialing systems, position code reporting, employment records, licensure data, and district staffing submissions. The proposed CR record would require districts to manually track and report vacancy timelines, vacancy reasons, filling methods, FTE calculations, former employee identifiers, and subject-area specific vacancy details that are already reflected through existing staffing changes and payroll processes.

From an operational standpoint, this proposal creates a significant additional workload for EMIS Coordinators, Human Resources departments, and Payroll staff. Many districts do not currently maintain vacancy data in a format that directly aligns to the proposed reporting structure, meaning this collection would require the development of entirely new local tracking procedures, cross-department coordination processes, and manual reconciliation efforts.

Additionally, several aspects of the proposal introduce ambiguity and subjectivity into reporting, including:

- Determining the precise "reason for vacancy"
- Tracking intended hiring timelines
- Reporting partially filled FTE positions
- Identifying vacancy fill methodology categories
- Managing multiple records for multi-subject or multi-building assignments

These requirements will inevitably lead to inconsistent reporting practices across districts and raise concerns regarding data reliability and comparability statewide.

I respectfully urge the Department to reconsider this proposal or, at minimum, explore alternative methods of obtaining staffing shortage information through existing data sources already available to the state.

Comment #7

Sent: Tuesday, May 19, 2026 12:27 PM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change #27-3, Public Comment

Good afternoon,

I am writing to provide public comment regarding EMIS Change 27-3, which proposes the addition of the Staff Vacancy (CR) Record collection.

While I understand the Department's interest in collecting data related to staffing shortages, the proposed collection appears largely duplicative and would create a substantial additional reporting burden for districts without yielding significant new information beyond what is already available through existing EMIS collections and other state systems.

Much of the requested data is already captured through current EMIS staff reporting, credentialing systems, position code reporting, employment records, licensure data, and district staffing submissions. The proposed CR record would require districts to manually track and report vacancy timelines, vacancy reasons, filling methods, FTE calculations, former employee identifiers, and subject-area-specific vacancy details that are already reflected through existing staffing and payroll processes.

From an operational perspective, this proposal would create a significant additional workload for EMIS Coordinators, Human Resources departments, and Payroll staff. Many districts do not currently maintain vacancy data in a format that aligns directly with the proposed reporting structure. As a result, implementation would require the development of entirely new local tracking procedures, increased cross-department coordination, and extensive manual reconciliation efforts.

Additionally, several elements of the proposal introduce ambiguity and subjectivity into the reporting process, including:
- Determining the precise reason for a vacancy
- Tracking intended hiring timelines
- Reporting partially filled FTE positions
- Classifying vacancy fill methodologies
- Managing multiple records for multi-subject or multi-building assignments

These requirements will likely result in inconsistent reporting practices across districts and raise concerns regarding the reliability and comparability of the data statewide.

I respectfully urge the Department to reconsider this proposal or, at minimum, explore alternative methods for obtaining staffing shortage information through existing data sources already available to the state.

Comment #8

Sent: Tuesday, May 19, 2026 1:42 PM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Cc:
Subject: EMIS Change #27-3, Public Comments

Good afternoon,

I am writing to provide public comment regarding EMIS Change 27-3, which proposes the addition of the Staff Vacancy (CR) Record collection.

While I understand the Department's interest in collecting data related to staffing shortages, the proposed collection appears largely duplicative and would create a substantial additional reporting burden for districts without yielding significant new information beyond what is already available through existing EMIS collections and other state systems.

Much of the requested data is already captured through current EMIS staff reporting, credentialing systems, position code reporting, employment records, licensure data, and district staffing submissions. The proposed CR record would require districts to manually track and report vacancy timelines, vacancy reasons, filling methods, FTE calculations, former employee identifiers, and subject-area-specific vacancy details that are already reflected through existing staffing and payroll processes.

From an operational perspective, this proposal would create a significant additional workload for EMIS Coordinators, Human Resources departments, and Payroll staff. Many districts do not currently maintain vacancy data in a format that aligns directly with the proposed reporting structure. As a result, implementation would require the development of entirely new local tracking procedures, increased cross-department coordination, and extensive manual reconciliation efforts.

Additionally, several elements of the proposal introduce ambiguity and subjectivity into the reporting process, including:

• Determining the precise reason for a vacancy • Tracking intended hiring timelines • Reporting partially filled FTE positions • Classifying vacancy fill methodologies • Managing multiple records for multi-subject or multi-building assignments

These requirements will likely result in inconsistent reporting practices across districts and raise concerns regarding the reliability and comparability of the data statewide.

I respectfully urge the Department to reconsider this proposal or, at minimum, explore alternative methods for obtaining staffing shortage information through existing data sources already available to the state.

Comment #9

Sent: Tuesday, May 19, 2026 2:23 PM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change #27-3, Public Comment

Hello,
I am writing to provide public comment regarding EMIS Change 27-3, which proposes the addition of the Staff Vacancy (CR) Record collection.

While I understand the Department's interest in collecting data related to staffing shortages, the proposed collection appears largely duplicative and would create a substantial additional reporting burden for districts without yielding significant new information beyond what is already available through existing EMIS collections and other state systems.

Much of the requested data is already captured through current EMIS staff reporting, credentialing systems, position code reporting, employment records, licensure data, and district staffing submissions. The proposed CR record would require districts to manually track and report vacancy timelines, vacancy reasons, filling methods, FTE calculations, former employee identifiers, and subject-area-specific vacancy details that are already reflected through existing staffing and payroll processes.

From an operational perspective, this proposal would create a significant additional workload for EMIS Coordinators, Human Resources departments, and Payroll staff. Many districts do not currently maintain vacancy data in a format that aligns directly with the proposed reporting structure. As a result, implementation would require the development of entirely new local tracking procedures, increased cross-department coordination, and extensive manual reconciliation efforts.

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- Determining the precise reason for a vacancy
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- Reporting partially filled FTE positions
- Classifying vacancy fill methodologies
- Managing multiple records for multi-subject or multi-building assignments

These requirements will likely result in inconsistent reporting practices across districts and raise concerns regarding the reliability and comparability of the data statewide.

I respectfully urge the Department to reconsider this proposal or, at minimum, explore alternative methods for obtaining staffing shortage information through existing data sources already available to the state.

Comment #10

Sent: Tuesday, May 19, 2026 5:49 PM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: change 27-3

If you are going to include EMIS Coordinators in the staff that are to be reported, there should be a 3 digit position code for them. I had submitted this as an enhancement in November of 2024, but it never happened. I think it is now needed.

Comment #11

Sent: Wednesday, May 20, 2026 8:13 AM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change #27-3, Public Comment

Good morning,

I am writing to provide public comment regarding EMIS Change 27-3, which proposes the addition of the Staff Vacancy (CR) Record collection.

While I understand the Department's interest in collecting data related to staffing shortages, the proposed collection appears largely duplicative and would create a substantial additional reporting burden for districts without yielding significant new information beyond what is already available through existing EMIS collections and other state systems.

Much of the requested data is already captured through current EMIS staff reporting, credentialing systems, position code reporting, employment records, licensure data, and district staffing submissions. The proposed CR record would require districts to manually track and report vacancy timelines, vacancy reasons, filling methods, FTE calculations, former employee identifiers, and subject-area-specific vacancy details that are already reflected through existing staffing and payroll processes.

From an operational perspective, this proposal would create a significant additional workload for EMIS Coordinators, Human Resources departments, and Payroll staff. Many districts do not currently maintain vacancy data in a format that aligns directly with the proposed reporting structure. As a result, implementation would require the development of entirely new local tracking procedures, increased cross-department coordination, and extensive manual reconciliation efforts.

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- Determining the precise reason for a vacancy
- Tracking intended hiring timelines
- Reporting partially filled FTE positions
- Classifying vacancy fill methodologies
- Managing multiple records for multi-subject or multi-building assignments

These requirements will likely result in inconsistent reporting practices across districts and raise concerns regarding the reliability and comparability of the data statewide.
I respectfully urge the Department to reconsider this proposal or, at minimum, explore alternative methods for obtaining staffing shortage information through existing data sources already available to the state.

Comment #12

Sent: Wednesday, May 20, 2026 5:50 PM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change #27-3, Public Comment

For this new record, would it be beneficial to collect the assignment area to delineate the 230 teachers for Music and Art? PE is included on this new record as a subject area but other ESP are not.

Will the EMIS Coordinator code be activated as a new Position Code in the CK record reporting?

- Currently there is no EMIS Coordinator position code in the EMIS manual section of position codes.

Can the subject area for credit _or_ subject area for core be used instead of Subject Area 2 digit codes, so we are reporting and gathering all types of educators by areas? The current list proposed does not seem to identify all types of subject area that would be needed to correctly identify all vacancy subject areas. Especially Sciences.

Can there be a vacancy reason of death like we have on the separation reason field on the CK? Can there be vacancy reason for changing positions within the district? Or an Other code?

Will this be vacancy record CR be compared to the reported CK separation reason code at all?

Can guidance be shared if the postings for the 26-27 year include reporting those as of 7/1/26 and beyond? Or are LEAs supposed to be tracking, retroactively, any positions vacant, posted and hired for the upcoming school year, even if this task occurred prior to ODEW EMIS Office posting the CR EMIS Reporting change? Looking for guidance on when LEAs need to begin tracking to be compliant with new EMIS change? When HB96 went into effect? When ODE EMIS Office posted the change, details, on their website (5/15/26)? Those positions posted only 7/1 and beyond? Those positions posted as of 8/1 and beyond? Once this change goes into effect after the public comment for tracking and reporting, so 60 days or so? Lots of questions surrounding what vacancies and posting need to be tracked? Can there be scenarios and FAQs on this topic added to the EMIS manual section.

Will this data show on the LRC for FY27 or beyond or another report from ODEW?

What if a district does not report CR data, are there any consequences?

Comment #13

Sent: Tuesday, May 26, 2026 1:08 PM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change #27-3, Public Comment

Good afternoon,

I am writing to provide public comment regarding EMIS Change 27-3, which proposes the addition of the Staff Vacancy (CR) Record collection.

While I understand the Department's interest in collecting data related to staffing shortages, the proposed collection appears largely duplicative and would create a substantial additional reporting burden for districts without yielding significant new information beyond what is already available through existing EMIS collections and other state systems.

Much of the requested data is already captured through current EMIS staff reporting, credentialing systems, position code reporting, employment records, licensure data, and district staffing submissions. The proposed CR record would require districts to manually track and report vacancy timelines, vacancy reasons, filling methods, FTE calculations, former employee identifiers, and subject-area-specific vacancy details that are already reflected through existing staffing and payroll processes.

From an operational perspective, this proposal would create a significant additional workload for EMIS Coordinators, Human Resources departments, and Payroll staff. Many districts do not currently maintain vacancy data in a format that aligns directly with the proposed reporting structure. As a result, implementation would require the development of entirely new local tracking procedures, increased cross-department coordination, and extensive manual reconciliation efforts.

Additionally, several elements of the proposal introduce ambiguity and subjectivity into the reporting process, including:
- Determining the precise reason for a vacancy
- Tracking intended hiring timelines
- Reporting partially filled FTE positions
- Classifying vacancy fill methodologies
- Managing multiple records for multi-subject or multi-building assignments

These requirements will likely result in inconsistent reporting practices across districts and raise concerns regarding the reliability and comparability of the data statewide.

I respectfully urge the Department to reconsider this proposal or, at minimum, explore alternative methods for obtaining staffing shortage information through existing data sources already available to the state.

Comment #14

Sent: Thursday, May 28, 2026 9:44 AM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change

I am writing to provide public comment regarding EMIS Change 27-3, which proposes the addition of the Staff Vacancy (CR) Record collection.

While I understand the Department's interest in gathering staffing shortage data, this proposed collection appears highly redundant and creates a substantial additional reporting burden for districts

without providing meaningful new information that is not already available through existing EMIS collections and state systems.

Much of the proposed data is already collected through current EMIS staff reporting, credentialing systems, position code reporting, employment records, licensure data, and district staffing submissions. The proposed CR record would require districts to manually track and report vacancy timelines, vacancy reasons, filling methods, FTE calculations, former employee identifiers, and subject-area specific vacancy details that are already reflected through existing staffing changes and payroll processes.

From an operational standpoint, this proposal creates a significant additional workload for EMIS Coordinators, Human Resources departments, and Payroll staff. Many districts do not currently maintain vacancy data in a format that directly aligns to the proposed reporting structure, meaning this collection would require the development of entirely new local tracking procedures, cross-department coordination processes, and manual reconciliation efforts.

Additionally, several aspects of the proposal introduce ambiguity and subjectivity into reporting, including:

- Determining the precise “reason for vacancy”
- Tracking intended hiring timelines
- Reporting partially filled FTE positions
- Identifying vacancy fill methodology categories
- Managing multiple records for multi-subject or multi-building assignments

These requirements will inevitably lead to inconsistent reporting practices across districts and raise concerns regarding data reliability and comparability statewide.

I respectfully urge the Department to reconsider this proposal or, at minimum, explore alternative methods of obtaining staffing shortage information through existing data sources already available to the state.

Comment #15

Sent: Thursday, May 28, 2026 10:58 AM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change #27-3, Public Comment

Good Morning,

Under the Vacancy Filled Method please clarify what the difference is between Hired fully qualified **personnel** and Hired fully qualified **staff** member. What is the difference between personnel and staff?

Comment #16

Sent: Thursday, May 28, 2026 2:32 PM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change #27-3, Public Comment

Good afternoon
I have a request to clarify the language used here:

RE Hired fully qualified personnel – Retired educator
AL Hired fully qualified personnel – Alternatively licensed educator
TR Hired fully qualified personnel – Traditional license pathway
OT Hired fully qualified staff member – Other

And then the definition is
A “fully qualified staff member” is someone who holds the license or credential required by the district to serve in that position. Fully qualified staff members include retired educators whose credentials match the position, an alternative licensure program candidate, or another fully qualified staff member.

I think it would make more sense if TR was Traditional licensed educator and then the definition explains exactly which license types belong here. RE, Professional, Lead, Senior? What about Out of State License or CTE license - would those fall under other?

I spent 12 years in district HR roles working closely with EMIS and this section isn't clear. I think you will get a lot of questions.

Comment #17

Sent: Friday, May 29, 2026 12:08 PM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change #27-3, Public Comment

Hi,

Will the CR vacancy data be used to identify contracted positions not reported by districts?

Sometimes the ESCs do not report complete CI/CK/CJ records for all contracted situations and the burden is on the contracting district to try to report duplicate data within their data to ensure compliancy.

Comment #18

Sent: Friday, May 29, 2026 12:11 PM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change #27-3, Public Comment

Hi,

Can the 'number of applicants' be added to this CR record to tell the story about applications?

Sometimes the hardship to fill vacancies is due to lack of applications and this data point could tell more of the story.

Suggested by HR/Treasurer

Comment #19

Sent: Friday, May 29, 2026 12:23 PM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change #27-3, Public Comment

We were asked if there could more details of the rational of the CR reporting and how ODEW will be using/publishing this vacancy data? Maybe add more language for use case?

Comment #20

Sent: Monday, June 1, 2026 11:51 AM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change #27-3, Public Comment

Hi,

Can the newly proposed position code for the new CR vacancy record, EMC, be added to the available reportable position codes for EMIS Coordinators so they can be correctly coded?

Often times districts will code as a Coordinator, 113, which includes their data in the 1xx position code calculations and data analysis reports by ODEW. EMC would allow correct position reporting since they often do not directly impact district instruction.

Comment #21

Sent: Wednesday, June 10, 2026 8:25 AM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change #27-3, Public Comment

Hello. I understand the Department's interest and reason in gathering staffing shortage data. However, this proposed collection appears to be a repeated effort that will create a substantial additional reporting burden for districts without providing meaningful new information that is not already available through existing EMIS collections and state systems.

Much of the proposed data is already collected through current EMIS staff reporting, credentialing systems, position code reporting, employment records, licensure data, and district staffing submissions. The proposed CR record appears to require districts to manually track and report vacancy timelines, vacancy reasons, filling methods, FTE calculations, former employee identifiers, and subject-area specific vacancy details that are already reflected through existing staffing changes and payroll processes.

From an operational standpoint, this proposal will create a significant additional workload for EMIS Specialists/Coordinators, Human Resources departments, and/or Payroll staff. Many districts do not currently maintain vacancy data in a format that directly aligns to the proposed reporting structure, meaning this collection would require the development of entirely new local tracking procedures, cross-department coordination processes, and manual reconciliation efforts.

Additionally, several aspects of the proposal introduce subjectivity into reporting, such as:

- Determining the precise "reason for vacancy"
- Tracking intended hiring timelines
- Reporting partially filled FTE positions
- Identifying vacancy fill methodology categories
- Managing multiple records for multi-subject or multi-building assignments
- Reporting vacancies for EMIS without a specific code assigned to that position

These requirements will inevitably lead to inconsistent reporting practices across the state and could raise concerns regarding data reliability and comparability statewide.

I respectfully ask the Department to reconsider this proposal or, at minimum, explore alternative methods of obtaining staffing shortage information through existing data sources already available to the state.

Comment #22

Sent: Thursday, June 11, 2026 6:43 AM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Cc:
Subject: EMIS | 27-3 | Staff Vacancy Record | Queries

Hello Team,

My name is [redacted], and I am the [redacted] for [redacted] supporting Ohio school districts.

I'm reaching out with a question regarding the FTE logic on the new Staff Vacancy Record – EMIS 27 – 3 Staff / Course.

Currently, the unfilled FTE value appears to be constrained within a range of 0 to 2.00. However, this may lead to a potential logical issue. For example, in cases where a new position requires multiple FTEs (e.g., a total of 5.0 FTE), the existing constraint could result in duplicate or indistinguishable records when attempting to report multiple unfilled positions.

Could you please clarify how such scenarios are expected to be handled? Alternatively, would it be possible to allow the FTE field to support a broader range (e.g., 0 to 100.00) to better accommodate cases involving multiple unfilled positions?

Comment #23

Sent: Thursday, June 11, 2026 8:57 AM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Cc:
Subject: #27-3, Public Comment

Good morning,

My name is [redacted] and I am the Director of Technology and Information Services for the [redacted]. I am writing, along with my colleague [redacted] our Data Systems & EMIS Coordinator, to respectfully request the staff vacancy requirement (Section 27.3) be reconsidered.

The demands of this proposed process impose an excessive burden on our district's personnel and financial stability. Given that no automated solution exists, capturing and entering this data requires intensive manual labor. To accurately document every change in staff vacancy and employment under these requirements, our district would be forced to hire at least three additional full-time employees. When viewed alongside diminishing state and federal funding, these mandates appear increasingly impractical and disconnected from the operational realities of public schools. We ask that you reconsider the implementation of Staff Vacancy changes in Section 27.3

Comment #24

Sent: Thursday, June 11, 2026 9:47 AM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: Subject #27-3, Public Comment

Dear Colleague,
My name is [redacted] and I have the privilege of serving as a lecturer for the Ohio State University. I am a practitioner in the field as the Deputy Superintendent for the [redacted]. I am writing, along with my colleague [redacted], to respectfully request the staff vacancy requirement (Section 27.3) be reconsidered. The amount of work required by this new process puts an untenable strain on district staff and financial resources. There is currently no efficient method to capture and input this information other than by the human hand. Stated simply, to gather this data for each of our changes in staff vacancy and employment requires our district to hire at least 3 full-time employees. This financial stress coupled with the current cuts in funding from the state and federal government make this change unreasonable and out of touch with the requirements of public schools across the state.

The [redacted] is the [redacted] largest in the state of Ohio, spanning 119 square miles inclusive of 35 learning facilities. As a district, we represent diversity in all facets. We represent 86 different languages and dialects. Our socio-economic status is inclusive of over 67% of our students requiring special financial assistance. Furthermore, the stratification of our district is represented by kindergarten readiness data. We have elementaries that enrolled 80% of students that are kindergarten ready, while others enroll a mere 4%. Importantly, we are the [redacted] largest employer in [redacted] County in both the public and private sector. I share this with you to provide context to the impact that the change

to Section 27.3 will have on the district. The strain is exponential due to the sheer number of staff we employ, transfer, retain, and retire. To provide context, each month our personnel portion of our board agenda includes between 500-700 personnel items relative to the previously mentioned classifications of employment and/or vacancy.

Again, we ask for your serious reconsideration of the impact of this change. Please do not hesitate to contact us for additional information and insights. We would be happy to provide data, evidence and a narrative to support the redaction of the Staff Vacancy changes in Section 27.3 for EMIS.

Comment #25

Sent: Thursday, June 11, 2026 9:58 AM
To: DEW EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change

Good morning!

I am writing to provide feedback regarding EMIS Change 27-3 and gain clarity on he reporting of this record.

1. Are we to include the reporting of vacancies where we are the fiscal agent for a on-public school? For example, a speech language therapist for a non-public school that resides within our district and auxiliary funds are used?
2. I believe there is a typo in the link to the EMIS Manual 3.10 Staff Vacancy (CR) Record for the reference to the EMIS Change 27-3. The first sentence says "Student" Vacancy (CR) Record rather than "Staff".

3.10 Staff Vacancy (CR) Record

Required Collections

The Student Vacancy (CR) Record is reported during the Initial Staff and Course (L) Collection and the Final Staff and Course (L) Collection.

Reporting the Staff Vacancy (CR) Record is required whenever an entity plans to hire for a vacancy for one of the position codes listed in this section. This record is reported by public districts, joint vocational schools, community schools, STEM schools, and educational service centers (ESCs).

General Guidelines

A "staff vacancy" is an open position that the district intends to fill during the reporting year. Whether or not a position is ultimately filled that reporting year, a Staff Vacancy (CR) Record should be reported.

3. I reached out to our vendor for our Human Resources System upon hearing of this change in hopes that they might help to develop a procedure for creating the needed records with a few needed changes in the software. They responded they have no plans to assist with the creation of this record.
4. I am currently mapping out a process and hope to write a report or have our ITC write a report from USPS for records reported with a separation reason for the specific position codes identified. The requirement to produce this record will take time to develop a new process and will create additional work. Just sharing. :) I am hopeful that SSDT may also have further guidance to ease the burden for districts for the creation of this record.