EMIS Change 22-30: Public Comments & Responses

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

Public Comment #1
Sent: Tuesday, June 22, 2021 2:30 PM
To: EDU EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS Change #22-30, Public Comment

These codes include reference to Structured Literacy Approaches, even though there is little evidence that such approaches work (see attached two articles). Also, there is no such thing as an intervention based on the three cueing system because that is not a theory as defined by any credible researchers. It seems ODE officials are trying to pull a fast one by introducing these codes to confuse school districts into believing that they cannot use Reading Recovery which has the highest rating of all 153 early literacy interventions in the What Works Clearinghouse (which incidentally shows very poor performance by branded and unbranded OG programs, which is precisely what "structured literacy" is. Please visit the International Dyslexia website to see where the term "structured literacy" actually comes from because according to their own website it is a term invented by the IDA board to "sell" and "brand" their interventions. Ohio law is clear that ODE is not supposed to name or support particular materials or programs and yet, here you are supporting unscientific programs (based on real research) and are denying access to proven interventions such as LLI and Reading Recovery. This will not sit well with Ohio's teachers or school districts, so I'm sure that pushing it through in June with no real ability to comment is your best effort to make these changes.

https://dyslexiaida.org/ida-approach/

152760	**Interventions Designed around the Three Cuing System** Small group or one-on-one short-term intervention promoting the use of the Three Cuing System by the student as the primary means to identify words informed by running records. This intervention strategy is not outlined in Ohio's Plan to Raise Literacy Achievement.

From: EDU EMISPublicComments <EMISPublicComments@education.ohio.gov>
Sent: Monday, July 19, 2021 2:22 PM
Subject: RE: EMIS Change #22-30, Public Comment

Good afternoon,

Thank you for your feedback regarding the EMIS Reading Improvement and Monitoring Plan (RIMP) intervention code changes. The Department revised the EMIS RIMP intervention code list to help districts more effectively identify specific reading difficulties and plan for effective intervention strategies. The revised RIMP EMIS intervention code list includes the identification of discrete evidence-based strategies and the elimination of purchased programs (that may provide multiple strategies) to provide a more unified way of analyzing EMIS RIMP intervention code data.

Furthermore, the revised RIMP EMIS intervention codes directly address specific reading difficulties. When purchased programs are listed, it is difficult to know what skill the student needs additional support with and how the intervention is mapping onto that skill.

Nonetheless, the EMIS RIMP intervention code changes do not mean that districts are required to change or replace their current purchased programs. Districts may continue to use their current programs and report into EMIS which specific strategy or strategies the program uses to address individual child needs.

Thank you,

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Columbus, Ohio 43215-4183
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Public Comment #2

I am writing to voice concerns about ODE taking away references to research-based interventions and replacing them with interventions that have few citations of a positive track record of results according to the WhatWorksClearinghouse. Adding the term "structured literacy" is equally problematic b/c it is well-known that this is a code/umbrella term for specific programs such as Wilson, Orton Gillingham and Fundations (as cited on the International Dyslexia website). I believe that ODE is not allowed to endorse specific programs and yet by taking away references to guided reading, Leveled Literacy Intervention, Success for All and Reading Recovery and adding 'structured literacy', you are not only endorsing particular vendors but simultaneously putting other vendors on the blacklist. This is not supposed to happen and needs to be rectified. Also, the research base on "structured literacy" approaches can be easily verified by a look at the WWC which is what ESSA requires. While 'structured literacy' has potentially positive, RR has proven positive results from research. As a matter of fact, the

recommendations often cited from the IES publication by Barbara Foorman in (Foundational Skills to Support Reading for Understanding in Kindergarten Through 3rd Grade) include citations of research about Reading Recovery in over 100 footnotes. Yet this important intervention, which is a non-profit Ohio-based international organization, is being systematically written out of Ohio schools. Not only is this decision not research-based, it seems illegal according to state guidelines about the role of ODE. Please continue to revise your thinking and either remove ALL references to actual programs or replace references to LLI, Reading Recovery and guided reading which all have a strong Ohio tie.

From: EDU EMISPublicComments <EMISPublicComments@education.ohio.gov>
Sent: Monday, July 19, 2021 2:22 PM
Subject: RE: EMIS codes revised

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Public Comment #3
Sent: Wednesday, June 30, 2021 10:35 PM
To: EDU EMISPublicComments <EMISPublicComments@education.ohio.gov>
Subject: EMIS codes

I am writing because I have noticed a change in EMIS codes that refer to interventions for reading that are no longer provided or seem to have been changed. These changes are not random but are specifically being used to remove/replace many proven interventions used in Ohio schools successfully with less successful programs (something called structured literacy) which seems to be a recently invented term that refers to specific programs listed on the IDA website. None of these programs have a great deal of research that shows substantially positive gains for students and yet references to other interventions which do show larger gains across the board (Reading Recovery, Success for All, Leveled Literacy Intervention, etc.) are being removed. Why is this happening? Isn't Ohio expected to be neutral to allow for local control of curriculum and interventions?

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Subject: RE: EMIS codes

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