

## EMIS Change 22-31: Public Comments & Responses

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

### Public Comment #1

**Sent:** Friday, April 30, 2021 4:12 PM

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

**Subject:** FY22 -31 Immigrant and English Learner EMIS Manual Change

Hi,

I support this change. Anytime the ODE EMIS departments can use the same terminology within their documentation, systems, manuals, presentations, etc., the better for all who use the information and systems as resources and tools.

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

**Sent:** Wednesday, May 12, 2021 8:36 AM

**Subject:** RE: FY22 -31 Immigrant and English Learner EMIS Manual Change

Thank you for your feedback about the Immigrant and English Learner EMIS Manual changes.

Office of Data Quality & Governance  
25 South Front Street  
Columbus, Ohio 43215-4183  
[education.ohio.gov](http://education.ohio.gov)



Learn more about [#EachChildOurFuture](https://www.ohio.gov/#EachChildOurFuture), Ohio's plan to ensure each child is *challenged, prepared and empowered*.

### Public Comment #2

**Sent:** Wednesday, April 14, 2021 3:42 PM

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

**Subject:** EMIS Change #22-31, Public Comment

Hello,

Proposed revision of language for Section 2.5: Student Attributes, Record Field FD170:

For option S (enrolled in school for the 2nd year), **change** "more than 180 school days and less than 360 days" to "more than 180 school days and no more than 360 days." Otherwise, the 360th day is not included in the definitions as currently written.

**From:** EDU EMISPublicComments <EMISPublicComments@education.ohio.gov>  
**Sent:** Wednesday, May 12, 2021 8:41 AM  
**Subject:** RE: EMIS Change #22-31, Public Comment

The program office is taking your proposed revised language for Section 2.5: Student Attributes, Record Field FD170 under advisement.

Thank you for your feedback and interest in EMIS. The data that districts and community schools report to the Ohio Department of Education play a critical role in shaping students' opportunities.

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### [Public Comment #3](#)

**Sent:** Friday, April 30, 2021 1:45 PM  
**To:** EDU EMISPublicComments <[EMISPublicComments@education.ohio.gov](mailto:EMISPublicComments@education.ohio.gov)>  
**Subject:** EMIS Change #22-31, Public Comment

Please see our comments in regards to EMIS Change #22-31.

1. Do not make rule comment deadlines on Saturdays or Sundays. Comments should be due on normal business days.
2. Several of the proposed changes appear to add an additional data collection window. Has the Department considered the level of burden that may put on schools to collect and report another window of data? Were schools consulted about this prior to the proposed change?
3. The updated language strikes out Entitlement and replaces it with Grant - indicating that there may be a definition associated with entitlement programs listed elsewhere. Could the definition not refer to "Entitlement and Grant" programs?
4. Regarding EMIS Change 22-31 - "this replaces an item that determines when a student is reclassified and replaces it with a definition. Does this take the authority away from the district and replace it with a definition from the department: Is this the Trial-Mainstream period that is at issue or the process for reclassification?"

**From:** EDU EMISPublicComments <EMISPublicComments@education.ohio.gov>  
**Sent:** Thursday, May 20, 2021 10:01 AM  
**Subject:** RE: EMIS Change #22-31, Public Comment

I have responded to each public comment below. Thank you for your interest in EMIS.

**1. Do not make rule comment deadlines on Saturdays or Sundays. Comments should be due on normal business days.**

Our public comment process is a total of 90 days in length. This schedule includes 30 calendar days for public comments, 30 calendar days for the Department to respond to comments, and then 30 calendar days for the change to be viewed by the public before it is considered “final”. Specific dates are documented on the [FY22 EMIS Change webpage](#). The dates for the initial set of changes posted for public comment were derived so the 90 day cycle completed on the last day of the fiscal year and were effective on July 1, 2021.

**2. Several of the proposed changes appear to add an additional data collection window. Has the Department considered the level of burden that may put on schools to collect and report another window of data? Were schools consulted about this prior to the proposed change?**

The proposed changes referenced do not add additional data collection windows to EMIS. The changes allow districts/community schools to report graduation-related data that currently are only able to be accumulated and reported at year end during other already existing EMIS data collection periods throughout the year. Districts and community schools will not be required to report throughout the year, but will have the ability to do so. This allows for closer to “real time” data reporting by districts/community schools and enables the Department to provide timelier and more accurate progress towards graduations reports and early warning reports. These reports will be especially helpful to districts and community schools when new students enroll during the year.

**3. The updated language strikes out Entitlement and replaces it with Grant - indicating that there may be a definition associated with entitlement programs listed elsewhere. Could the definition not refer to "Entitlement and Grant" programs?**

This proposed change in the EMIS Manual aligns the terminology with how the ECE grant is now referred to. The referral to 'Entitlement Program' is outdated language. The EMIS change does not change what districts and community schools report.

**4. Regarding EMIS Change 22-31 - "this replaces an item that determines when a student is reclassified and replaces it with a definition. Does this take the authority away from the district and replace it with a definition from the department: Is this the Trial-Mainstream period that is at issue or the process for reclassification?"**

I reached out to the program office regarding your concern. Here is their response:

It is the Trial Mainstream Period that is the issue, not the process for reclassification.

The change is being made to update a component of the trial mainstream description that remains from the days of the Ohio Test of English Language Acquisition (OTELA), which was Ohio’s English language proficiency test before the current Ohio English Language Proficiency Assessment (OELPA).

The Ohio Department of Education defines the trial mainstream as the following:

*The Trial Mainstream category for English learners is used for programmatic and funding purposes only. The Department considers English learners who score a combination of 4's and 5's in three domains and a score of 3 in one test domain as Trial Mainstream. These students still are provided all necessary English learner program supports, with targeted intervention in the domain for which they scored a 3. A student in Trial Mainstream cannot exit the EL program. Although Trial Mainstream status applies only one year at a time, a student may remain in Trial Mainstream status for a number of years. The Trial Mainstream category is determined each year based on the most current OELPA scores. Students with scores of INV = invalidated or N = not attempted are not eligible for Trial Mainstream.*

With the OELPA and in current practice, English learners in the trial mainstream do not remain in the trial mainstream period until they are reclassified from English learner status. Whether the student is reported in the trial mainstream category is determined by the most current OELPA scores, as described above.

Students exit English learner status when they demonstrate English proficiency on the OELPA. A student receives an overall performance level of "Proficient" when he/she scores all 4's and 5's on the domain tests of the OELPA. When a student is proficient and exits English learner status, they are reclassified and reported as non-English learners using code N.

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