

## EMIS Change 24-60: Public Comments & Responses

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

All public comments received the following response on Monday, June 5, 2023:

Thank you for your interest in EMIS and providing a public comment. This change adds new program codes for entering kindergartners that describe the student's preschool experience.

This reporting is required by [ORC §3301.0714\(B\)\(3\)\(b\)](#). The law also specifies a breakdown of public, private, and head start programs. The program codes included in this change directly mirror the law, with exception of the public programs that are already reported to EMIS. We do not have codes for those programs because we will calculate this participation based on previously reported data in EMIS.

I do want to emphasize that reporting these program codes is optional for FY24; it will be required in FY25. This information can be used by the Department in a variety of ways, for example, it may help identify where additional PreK funding is needed to close the kindergarten readiness gap ahead of compulsory age.

The Office of Early Learning and School Readiness will be publishing additional information in the Fall to assist districts with the new program codes.

Thank you,

**Erica Weaston**  
Office of Data Quality & Governance

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### [Public Comment #1](#)

**From:** <redacted>

**Sent:** Wednesday, April 12, 2023 7:28 AM

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

**Subject:** EMIS Change #24-60, Public Comment

Good morning,

Why is this information being collected?

Per ORC, compulsory education begins at age 6. While it is "nice to know" if the student has attended PreK, it in no way makes a difference to class placement or the way the teacher proceeds in their classroom. Kindergarten students who are in need of intervention are quickly determined based on classroom observation and the KRA.

I DO NOT support the collecting of this information.

### [Public Comment #2](#)

**From:** <redacted>

**Sent:** Wednesday, April 12, 2023 7:50 AM

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

**Subject:** EMIS Change #24-60, Public Comment

Please clarify which program code should be used for students who attended preschool in a public school district that reports to emis.

For instance, our district has preschool at our Primary building, and we report to emis.

800020 says "preschool school programs licensed by the state of ohio that do NOT report to emis".

Should our preschool be considered 800030 Not identified since we report to emis?

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

**From:** <redacted>

**Sent:** Wednesday, April 12, 2023 9:42 AM

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

**Subject:** EMIS Change #24-60, Public Comment

This change is coming too late to be required for the 23-24 school year. This is typically a question that would be asked at registration, but we started KG registration at the beginning of February and it is too late to ask this question. I would suggest making these codes optional for FY24 and not required until FY25.

#### [Public Comment #4](#)

**From:** <redacted>

**Sent:** Friday, April 14, 2023 9:06 AM

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

**Subject:** EMIS Change #24-60, Public Comment

I'm not sure why this information is being collected if compulsory school age is 6 years old. This information makes no difference on class placement or the way the teacher would interact with the student in their classroom. If intervention is needed, this is determined very early on with the kindergarten screenings and the KRA. This seems nothing more than collecting unnecessary information for no reason. I do not support collecting this information.

#### [Public Comment #5](#)

**From:** <redacted>

**Sent:** Wednesday, April 19, 2023 12:23 PM

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

**Subject:** EMIS Change #24-60, Public Comment

Hello -

Obtaining such specific Preschool information from parents regarding Department based programs vs Non Department based programs, and the time span of attendance will be challenging for districts as parents may not be knowledgeable of the program information or respond as needed on the enrollment forms.

What may be very helpful to districts, is a Level 2 report that would list the incoming KG students that are required to have a program code (similar to the Exiting Student Followup Collection reports) based on data ODE has already received from those Department based programs.

#### [Public Comment #6](#)

**From:** <redacted>

**Sent:** Friday, April 21, 2023 9:30 AM

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

**Subject:** Emis change 24-60

Good morning.

I am not sure why a preschool experience code is necessary. It might be fun information to have, however, preschool education is not required and all kindergarten students are assessed with the KRA and properly placed. This code seems to be fluff that would not have much benefit for the student. I am not in favor of this program code.

### [Public Comment #7](#)

**From:** <redacted>

**Sent:** Tuesday, May 2, 2023 10:07 AM

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

**Subject:** EMIS Change #24-60, Public Comment

Please reconsider the explanations for the 'other than head start' program codes. Parents aren't going to know which preschool programs report students in EMIS and which don't. This lack of understanding will result in inaccurate data being reported. For example, if the parent is unsure they will just select Not Identified/Other. Parents need simple, straightforward explanations of what the codes mean to result in accurate data.

Thank you for this opportunity to comment.

### [Public Comment #8](#)

**From:** <redacted>

**Sent:** Wednesday, May 3, 2023 1:38 PM

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

**Subject:** EMIS Change 24-60

Hello,

In regards to EMIS Change 24-60, the following concerns arose:

1. Too many codes
  1. Confusing
  2. Relying on parent memory (yes this is a challenge)
  3. Does it include summer months
2. Is this referring to Early Intervention? Like Bright Beginnings?
3. Why a code of Student did not attend any PS program before KG
  1. Modifying every record

### [Public Comment #9](#)

**From:** <redacted>

**Sent:** Tuesday, May 9, 2023 9:50 PM

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

**Subject:** FY24 24-60 KG preschool experience

**Importance:** High

Hi,

- 1) It would be helpful to have an additional response/program code that captures – **parent refusal** - which is different than none preschool experience program.
  
- 2) Districts have shared and asked:
  - Gathering data and ensuring parent/guardian/social worker memory and accuracy will be challenging for Ohio School districts.
  - How will this data be used by ODE?
  - Will this preschool experience data be displayed on the report card or student opportunity profiles? If so, what will be reported?

#### [Public Comment #10](#)

**From:** <redacted>

**Sent:** Wednesday, May 10, 2023 9:48 AM

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

**Subject:** EMIS Change #24-60, Public Comment

Good Morning,

Per ORC, compulsory education begins at age 6. While it is “nice to know” if the student has attended PreK, it in no way makes a difference to class placement or the way the teacher proceeds in their classroom. Kindergarten students who are in need of intervention are quickly determined based on classroom observation and the KRA.

I DO NOT support the collecting of this information nor do I support reporting program codes solely based off "parent feedback"

#### [Public Comment #11](#)

**From:** <redacted>

**Sent:** Wednesday, May 10, 2023 10:05 AM

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

**Subject:** EMIS Change #24-60, Public Comment

Good Morning,

Per ORC, compulsory education begins at age 6. While it is “nice to know” if the student has attended PreK, it in no way makes a difference to class placement or the way the teacher proceeds in their classroom. Kindergarten students who are in need of intervention are quickly determined based on classroom observation and the KRA.

I DO NOT support the collecting of this information nor do I support reporting program codes solely based off "parent feedback"

### [Public Comment #12](#)

**From:** <redacted>

**Sent:** Wednesday, May 10, 2023 10:38 AM

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

**Subject:** EMIS Change #24-60, Public Comment

As supervisor of our Registration Department, I would like to comment on proposed EMIS change 24-60.

It has been our experience that most families do not know the difference between Headstart and other Preschool programs. I am not convinced that you will receive good data by asking the parents these questions. If the Headstart programs already report to EMIS, it seems as if that piece of data could be derived from EMIS data already collected.

Also, we have been enrolling Kindergarten students for FY24 since March and have missed the opportunity to ask this question as a part of the enrollment process for FY24 Kindergartenb students. If this reporting requirement is added, implementation would be much easier for districts if required reporting is delayed until FY25.

### [Public Comment #13](#)

**From:** <redacted>

**Sent:** Wednesday, May 10, 2023 10:40 AM

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

**Subject:** EMIS Change #24-60, Public Comment

Good Morning,

As Superintendent, I do not support the collection of data concerning a Kindergartener's preschool experience as prescribed in by [ORC §3301.0714\(B\)\(3\)\(b\)](#). The collection adds yet another burden on our education staff and the data is strictly provided by the parent with no guarantee of its accuracy or truthfulness.

### [Public Comment #14](#)

**From:** <redacted>

**Sent:** Wednesday, May 10, 2023 1:19 PM

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

**Subject:** EMIS Change #24-60, Public Comment

Hello,

I would like ODE to reconsider these new Kindergarten Program Codes. I don't believe parents will be able to provide accurate information. They do not know the difference between Head Start and Preschool, and as we know - garbage in, garbage out.

Is there not another way ODE can derive this data from what you already collect?