

EMIS Change 24-82: Public Comments & Responses

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

Public Comment #1

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

Sent: Thursday, June 15, 2023 11:52 AM

To: redacted

Subject: RE: 24-82 Updates to withdrawal reporting guidance & new element: Data Integrity Concern

Good morning,

Thank you for your public comment and interest in EMIS. Your comment included a number of questions, which I have tried to answer below, in red. Please let me know if you have additional questions or an answer is not clear.

This change seems to negate the fact that 3TRD usually reflects the most accurate depiction of student enrollment for the fiscal year, will create confusion in districts and additional work.

3TRD reflects the most accurate depiction of student enrollment in terms of enrolled or not enrolled, but it does not necessarily depict the most accurate indication of where students who are no longer enrolled have gone.

The instructions lead one to believe that once a withdrawal reason (FS100) has been reported and was true at the time, then that must be permanent for EMIS reporting.

That is the current reporting guidance. The EMIS Manual and guidance provided via the EMIS helpdesk and trainings has been to ***not*** update withdrawal information throughout the school year *unless* what was reported was found to be in error. For example, if a student was withdrawn as of a certain date as moved not known to be continuing and it is later found that the student actually moved out of state prior to the moved not known to be continuing date, then we would direct the district to update the withdrawal information. However, if it is discovered that the student moved out of state 3 months *after* the withdrawal date, we would direct the district to continue reporting the moved not known to be continuing information as that is how the district left the district.

In a transient district and especially during difficult economic times, parents plan one thing for their student and then find themselves on a different course.

The following is an example:

Parent notifies district A that they are moving out of state on 12/01/2022. District A withdraws the student with a 42. On 01/10/2023, District A receives a records request for the student from District B. District B isn't out of state; it is another Ohio public district.

- If district A only updates the new element, Updated Exit Status (FS380), to show an updated exist status of 41, SCR errors will exist for District B.

These SCR conflicts don't impact funding and can be ignored. Districts should not be updating what they report to EMIS just to reduce conflicts in ODDEX. If what was reported in EMIS is correct, the conflicts should be ignored.

- Or is it expected that District A would update both the Updated Exit Status (FS380) and update the withdrawn to IRN (FS360)?

Only the Updated Exit Status would be updated.

- What about times where the parent didn't notify District A of the withdrawal so the student is marked Truant, and then District B reports the students as enrolled?

Given the time, paperwork, and contact with the family and the courts that is required before a student can be withdrawn as truant, this is not something that should be happening much at all. As stated in EMIS Manual Section 2.1.1, "this code should be used in limited and unusual situations." That said, if the proper steps are followed and the district correctly withdraws the student and the student goes and enrolls in another district at a later date, then the original district should not be updating their withdrawal information. Instead, they would report the new Updated Exit Status.

- Why would it be proper to back date the withdrawal date and withdrawal codes just because one of the three collections is still open... why wouldn't we leave them as enrolled since that was our truth at the time?

We may need a little more clarity about your question if this response does not fully address it.

It wouldn't be back dating a withdrawal. If a parent notifies a district they are withdrawing their student, regardless of the reason, then the district should withdraw that student as of the date indicated by the parent. If a parent comes in and says they're moving out of state and their child's last day at the district will be December 1 and December 1 is indeed the student's last day in that school, the district should report accordingly.

If the family ends up not moving out of state and enrolls the child in a different Ohio school district on January 10, leaving the reported withdrawal information is not back dating the withdraw. Leaving the student enrolled is *not* the district's truth between December 1 and January 10. The parent withdrew the student and the student was not in school during that time, so no one should be reporting them as enrolled and no one should be receiving funding for them.

Instructing districts to report the withdrawal as they know it to be true and documented at the time and then expecting them to update other elements to correct EPCT, WTIC, RFIC, etc is going to compromise data integrity for the year. Districts should just continue to keep solid documentation and a proper audit trail in the student's permanent record.

If there's an EPCT conflict indicating overlapping enrollment, then the district may well need to update their withdrawal information. In such situations, it's quite possible that what was known and reported by the district was not correct and is in need of updating. As for withdrawn to and received from

conflicts, we are not asking districts to update reporting to “correct” these. If the data being reported is accurate, then the conflict can be ignored.

This shouldn't be necessary for EMIS reporting and funding. We do not report every component of our staff and financial transactions to match an audit trail, why would this need to be tracked? Please advise what benefit this change will provide to the overall good of education.

This new element will reduce the number of Student Withdrawal Override Records that districts need to report. Take the example of the student withdrawn as moved not known to be continuing who later moves out of state. Because that withdrawal information was true and accurate and should therefore not be updated, the student would negatively impact the district's grad rate. To avoid that, the district would report a Student Withdrawal Override Record the year following the student's withdrawal in order to remove the student from their grad rate. With this change, the district can enter the 40 in the Updated Exit Status Element and no Override Record will be needed the following year.

Thanks,

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From: redacted

Sent: Thursday, May 11, 2023 9:51 AM

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

Subject: 24-82 Updates to withdrawal reporting guidance & new element: Data Integrity Concern

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