

Good morning, President Kohler, Vice President McGuire, Superintendent DeMaria, and members of the Board:

Thank you for your time and attention as I spoke with you last week about my concerns, and those of the Ohio Association for Gifted Children, over the Department of Education's *Chart of Approved Assessments* as it pertains to gifted identification and screening. I would like to follow up with several points of clarification.

90 Day Referral Window with No Dance Assessment Available

The department has provided an assessment to evaluate students for gifted identification in the area of dance up to 13 years, 11 months. They term this as a K-8 assessment. However, we currently have multiple referrals for students 14 years and older for whom this assessment is not valid. The Department publicly acknowledge the deficiency at our Gifted Regional Meeting on September 5, 2019 and subsequently sent out an email on September 13, 2019 in order to recruit individuals to develop a new State checklist. Meanwhile, districts are bound to the latest list of approved assessments that took effect on July 1, 2019, lacking this assessment, which now forces us to be out of compliance with State law.

Assessment Review Committee

ODE needs to include individuals with expertise specific to gifted assessments on the review committee. These individuals should possess specialized knowledge in regards to norm-referenced assessments, students from special population, twice exceptional students, gifted students, and Ohio gifted law.

The Department of Education has a differing opinion than OAGC in regards to the qualifications of this review committee. We do not feel that those currently on the committee have the necessary background knowledge to evaluate these assessments for gifted identification. We would prefer that individuals have an actual degree in gifted, experience administering and scoring tests for the purpose of gifted identification, **and** training in statistical analysis and psychological testing. Such individuals must be more than someone with an endorsement in gifted education, as our required coursework for this licensure in the State of Ohio does little to educate candidates in regards to testing instruments and statistical analysis.

Assessments used to identify students as gifted are norm-referenced, where the majority of the assessments from the *Chart of Approved Assessments* are being used for criterion referenced scores. Essentially the purpose and application of tests, plus how criteria are established for various benchmarks, is drastically different for tests used for gifted identification as compared to the use of tests for other purposes included in the process.

OAGC communicated with the Department, on multiple occasions, our concerns with the level of expertise on the assessment review committee. We have repeatedly asked for someone with relevant experience to be added and have either had the request ignored or denied by the Department. ODE's own Gifted Advisory made the same request verbally and in writing at least three times last school year and were met with silence from the Department staff. As a result, we have found technical error in several assessments in regards to gifted identification.

Examples of several of the most pressing technical errors include:

-iReady: evidence of validity for the purpose of gifted identification has been requested by OAGC repeatedly. The Department even made a similar request in 2017-18, however the

information furnished by the vendor related to validity for the purpose of predicting achievement on the AIR tests, not toward gifted identification.

- inappropriately applied identification criteria from IQ tests to five achievement tests
- an approved sub-score on a cognitive ability test (CogAT) whose own testing company states in their technical manual that the sub-score is not appropriate on its own for determining a student's intelligence level or giftedness.

RFQ Process: Lacking Instruments for Twice Exceptional Students and those from Special Populations

Following the first round of the RFQ process in March 2018, when few testing companies submitted materials for approval, the Department allowed us to continue using the previous list (from 2017) to identify students. After the second round of the RFQ process when a large chunk of testing materials were still missing from the list, OAGC recommended allowing those previously approved to complete an abbreviated renewal form. The Department denied this request. The issue is that these companies had already gone through an extensive approval process in years prior but were mandated to re-apply, which was poorly communicated and buried in the application materials mid-way through the documents.

The Department has voiced concerns that these tests from the 2017-2018 list have not been properly vetted. However, all of those assessments were reviewed by a team of 5 people, including two psychometricians, and two individuals with doctoral degrees in psychology and giftedness, plus a practicing school psychologist. This past review was far more rigorous and conducted by individuals with stronger qualifications than the 3-person team the Department currently has conducting reviews. By having vendors from the 2017-2018 list use the abbreviated form, it removes an undue burden from the companies, thus increasing the likelihood that the tests can be added back on. At the same time, that abbreviated form allows the Department to review the existence of current norms and have record of renewal similar to their current protocol. That should suffice for the issues the Department has raised.

Finally, one additional point of clarification, in regards to the testing instrument mentioned with norms from 2003. This is an outlier example and does not accurately reflect the reasons why there are so many testing instruments missing from the latest *Chart of Approved Assessments*. We at OAGC heartily agreed with this instrument being removed from the list of approved assessments. However, we take issue with the fact that the great majority of those assessments not currently on the list, that were approved to be on our previous lists (approximately 30), are from only two publishing companies that felt the process was too cumbersome and time consuming for the number of testing instruments they would need to submit paperwork for (which had already been approved by the Department prior to this new RFQ process being implemented).

The gifted community, as always, is willing and able to provide assistance and input to the Department of Education. We are asking that we be allowed to do so and that these issues with the *Chart of Approved Assessments* be addressed so we are better equipped to identify gifted students within the diverse populations represented throughout our school districts in the State of Ohio.

Best regards,
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