

October 15, 2019

Dear Board President Kohler, Members of the Board, Superintendent deMaria,

Thank you for your ongoing attention to the needs of gifted learners and school districts as they seek to properly identify and serve such students. I wanted to provide an update on the status of concerns related to the Department's approved gifted assessment list.

In the month since the Board last met, the Department has made strides in their attempt to address one of the key concerns of OAGC and school districts statewide – the absence of instruments for assessing students age 14 and older for possible giftedness in the area of dance. The Department convened a committee to develop its own checklist. That checklist is in draft form and, at last notice, was being piloted in some districts in order to validate the items and establish scoring norms prior to approval. We were last informed that the Department hopes to have it ready by October 30. In the meantime, the Department has granted limited approval of a checklist that was on the 2017-2018 approved instrument list specifically for the use of evaluating students age 14 and older in the area of dance. We appreciate the efforts of the Department to address this concern and look forward to when everything is fully in place.

However, as the months continue on, new concerns arise. For example, while we initially thought the absence of checklists is an issue only for dance, it has become evident the problem continues in the areas of art, music, and drama. Currently, one checklist is approved for use with students age 14 and older when evaluating students for gifted identification in these areas. However, if a student obtains a score close to the identification threshold but not quite there, districts are required to administer a second checklist. For students age 14 and older, a second checklist does not exist. The Department's current guidance is to find a second rater to complete the same checklist for the student. The problem is that checklists are to be completed by an individual familiar with the student's talent. Unless they are privileged enough to have access to private lessons, most students only have one person at school with both familiarity of the student and proper training to rate the student. To ask someone without such knowledge to complete the checklist would invalidate the assessment. (Note - This is not the first time this fall someone at the Department has provided guidance that promotes administering an assessment in a manner different than what a publisher has indicated. Although in both cases the advice was well-intended, it was misguided and directed districts to use assessments in an unethical manner.) While the Department could develop checklists for high school students to be evaluated in the areas of art, drama, and music similarly to how they are creating one for dance, we realize it will take time and cannot be completed within the limited timeline currently faced by districts. There is a simple solution to this, though. We ask that the Department expand the approval of the GATES-2 checklist from just dance to also include art, music, and drama. Keep in mind, this checklist was reviewed and approved by a qualified committee in the past, and the portion of the checklist in question is the same portion the Department allows for dance. We are not asking for an expansion of the grade bands or ages for which it is approved, just the addition of the other artistic areas. This request was made to the Department staff about a week ago, but no definitive response has been received.

The other newly surfaced concern includes inconsistent calculations of cut scores for the approved cognitive assessments. In one case, it appears the cut scores were miscalculated from a basic arithmetic standpoint. In the other case, it seems the application of the Standard Error of Measurement was done in a way that is inconsistent with its use for other instruments and is different than past practice. Both issues were communicated to the Department about a month ago, but no explanation, resolution, or response has been provided other than to acknowledge receipt of our communication.

We also are still awaiting a response from the Department on three other issues. First, the Department approved use of a single subscore of one test for identification in superior cognitive ability. While the publisher's sales team requested it in the application, the technical documentation provided by the publisher clearly denoted it is inappropriate. Additionally, the Department has past communication from the test developers emphasizing that use of that subscore alone was not appropriate for gifted identification, and the test authors have published research and presentations with a similar message. Once again, approval of the score puts districts in a position to apply an assessment in a manner inconsistent with its validated use; this requires districts to act in an unethical and illegal manner.

Most of these issues would have been prevented if, as has been repeatedly requested, the Department included people on the committee who have proper training and experience in gifted assessment. The Department has treated review of gifted assessments as educational testing. But, in the broader field of assessment, gifted identification really falls under the umbrella of psychological assessment. Therefore, committee members should be qualified in that area. The Department maintains qualified individuals were on their review committee because they included the gifted consultants from within the Department. We disagree. Now, know that we have great respect for the gifted consultants. We believe they seek to do the best thing for children and want to provide the best guidance they can in light of Ohio rule and law. Each has their own unique areas of expertise within the field that allows them to contribute to the work of the Department. But, gifted assessment is not one of them. One of the three staff members is not eligible to administer or score any of the approved assessments per publishers' guidelines. The other two are qualified to administer some of the approved instruments, but they have limited experience administering and scoring the assessments for the purpose of gifted identification; further, they would not be authorized to administer or score many of the others per requirements set by the test publishers and Ohio law. It seems that the people who are reviewing and determining approval of the instruments should, at the very least, be qualified to administer, score, and interpret the tests being reviewed. That kind of expertise is sorely lacking on the committee. Last month, Superintendent deMaria alluded to potentially being open to including someone with such expertise on future committees. We hope that is the case. However, to date, there has been no follow-up on such possibility.

Finally, there has been no action addressing the lack of instruments that can be individually administered to special populations. The Department has commented multiple times that this new assessment approval process is an outcome from the Superintendent's Assessment Advisory Committee. That committee never discussed the approval process itself. However, as

a committee, we did have two goals that were reiterated often. First, and foremost, we sought to reduce the amount of time students would spend testing. Second, we wanted to increase choices for districts to accomplish testing purposes. This limited, approved assessment list does neither. For students who may be twice exceptional, such as students who are both potentially gifted and have a disability or who are English learners, and for students who are at the beginning or end of their school careers, choices for individually administered gifted assessments are very limited. Districts would have to purchase new assessments if their preferred instruments are not on the approved list, would have to pay for training for their staff to learn to administer those assessments, and would potentially have to use an assessment that is not well-suited to the needs of the student being assessed. That does not promote district choice. Alternatively, if a student is tested for a possible disability by a psychologist using a test that is not approved, and the results indicate potential giftedness, the student would have to sit through another round of assessments - which are likely less nuanced than the original psychological testing administered - in order to determine if the child is gifted in line with Ohio's approved instrument list. This double testing is in direct contract to the Assessment Advisory Committee's goal of reduced testing and is not in the best interest of the student.

The Department holds that the lack of assessments that can be used for individual assessment is because the publishers have not submitted them for approval. This is true, but, after two years, the Department refuses to consider that their application process may be the reason for that lack of submission. The two companies that publish most of the assessments in question have not been able to dedicate the manpower needed to complete the cumbersome full application to be reapproved. Yes, I said reapproved. Let me be clear that we are talking about assessments that have been previously reviewed and approved by a highly qualified committee overseen by the Department. We are talking about assessments that are widely considered by the psychological and educational community to be better assessments for the purpose of diagnosing student exceptionalities, including giftedness, than many of the tests currently on the list. The Department could rectify this issue by allowing these previously approved instruments to be submitted for reapproval using the abbreviated process they have in place for other instruments that were added to the list more recently.

Let me say again that we appreciate the steps the Department has taken to address our concern about the lack of instruments for assessing students in the area of dance. The immediate actions they have taken have enabled districts to comply with state laws. This is a step in the right direction. However, we still have a long way to go to resolve the plethora of issues that remain. I appreciate your ongoing support of the needs of gifted learners and the school districts who seek to identify and meet their needs.

Sincerely,
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