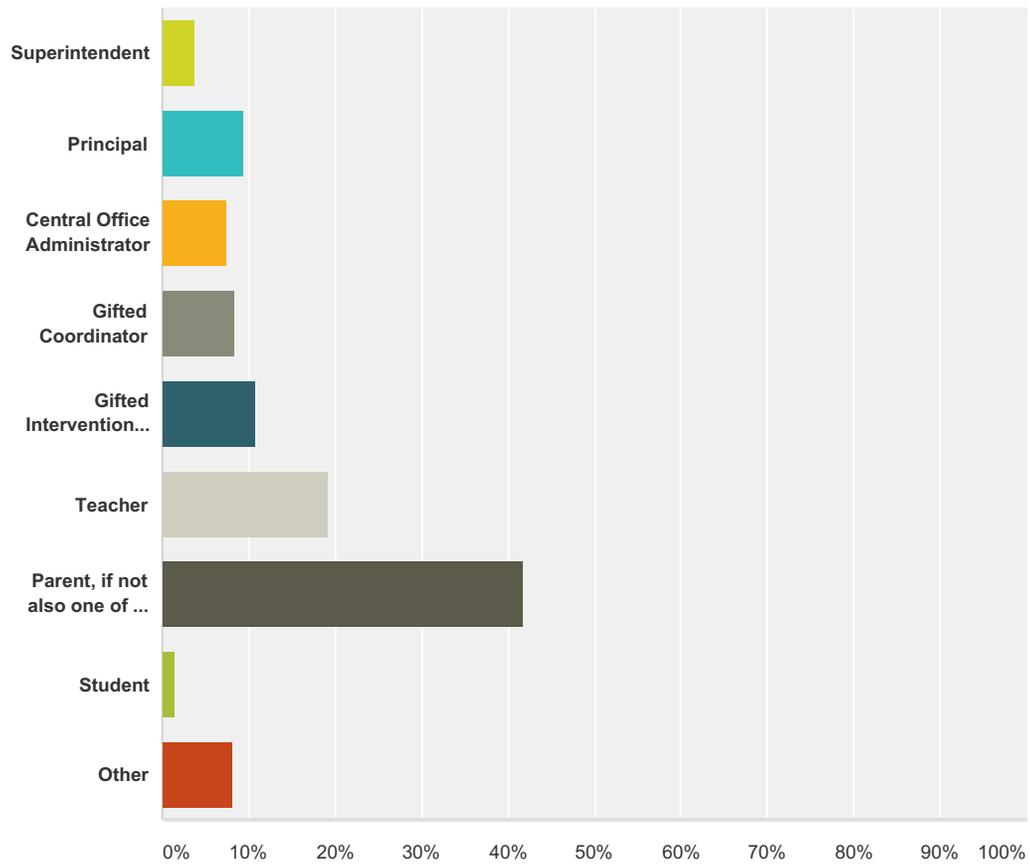


Q1 Please indicate your role:

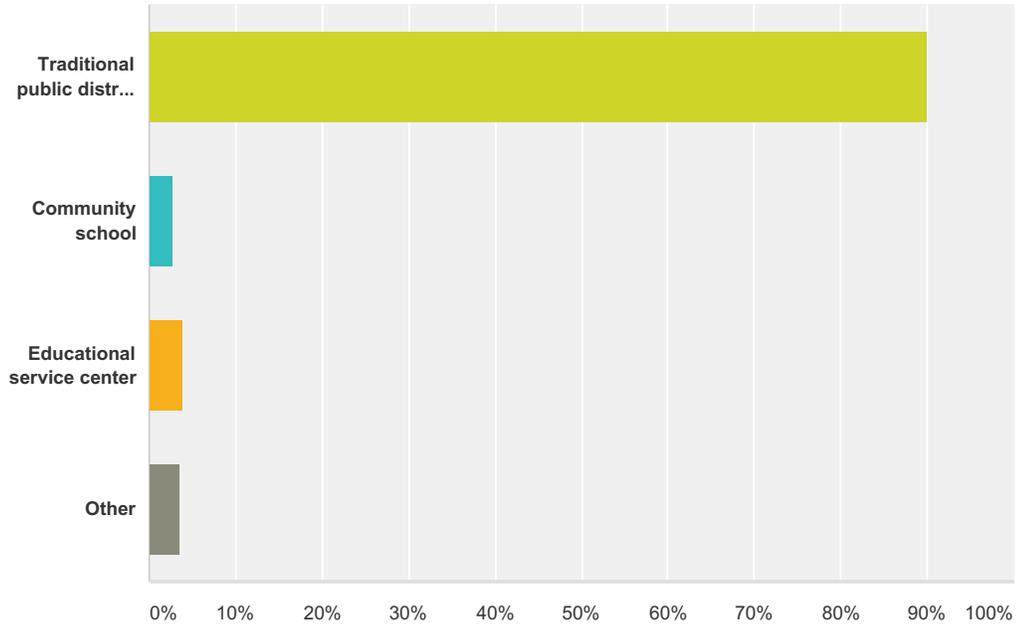
Answered: 3,451 Skipped: 11



Answer Choices	Responses
Superintendent	3.71% 128
Principal	9.42% 325
Central Office Administrator	7.56% 261
Gifted Coordinator	8.43% 291
Gifted Intervention Specialist	10.87% 375
Teacher	19.24% 664
Parent, if not also one of the roles above	41.70% 1,439
Student	1.36% 47
Other	8.11% 280
Total Respondents: 3,451	

Q2 Please indicate your organization type or child's school type, if answering as a parent:

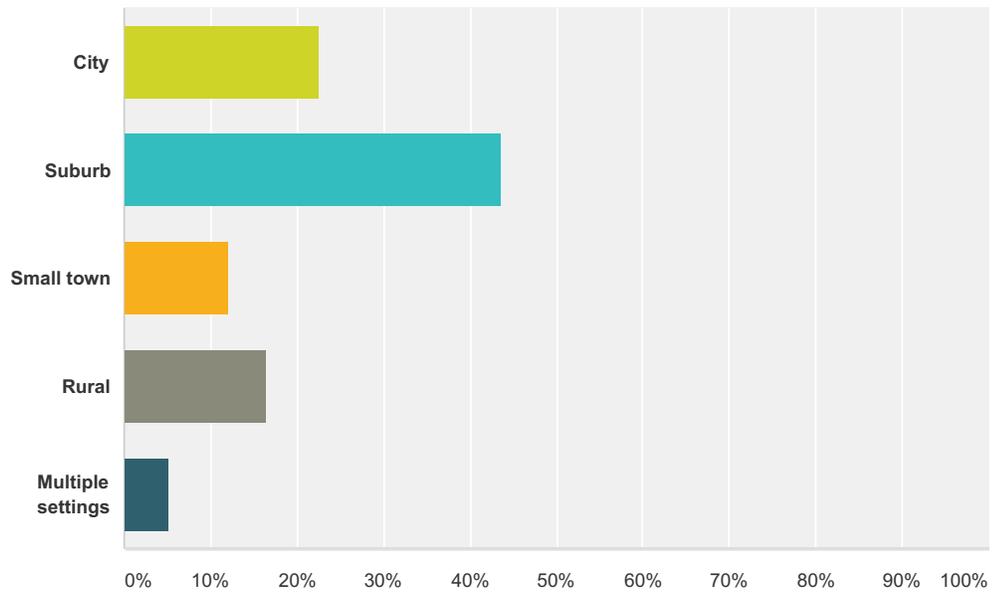
Answered: 3,176 Skipped: 286



Answer Choices	Responses
Traditional public district or school	89.89% 2,855
Community school	2.68% 85
Educational service center	3.87% 123
Other	3.56% 113
Total	3,176

Q3 Please indicate the setting of your organization:

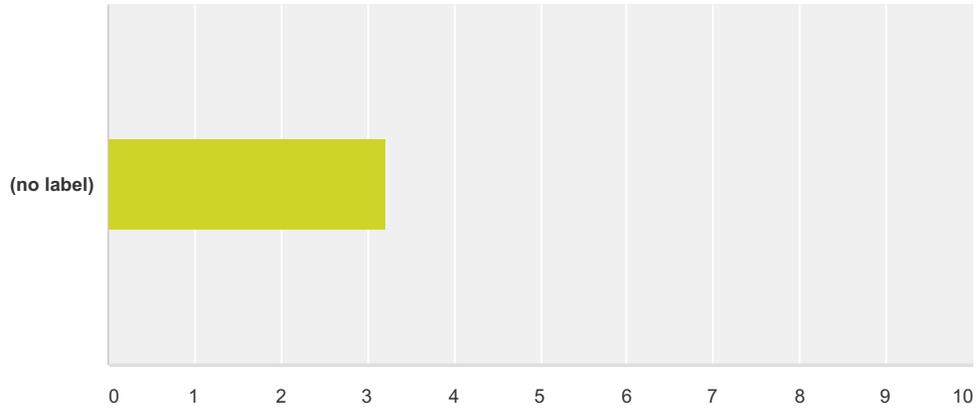
Answered: 3,438 Skipped: 24



Answer Choices	Responses
City	22.54% 775
Suburb	43.72% 1,503
Small town	12.16% 418
Rural	16.46% 566
Multiple settings	5.12% 176
Total	3,438

Q4 The proposed rule provides the guidance needed to support identification of gifted students.

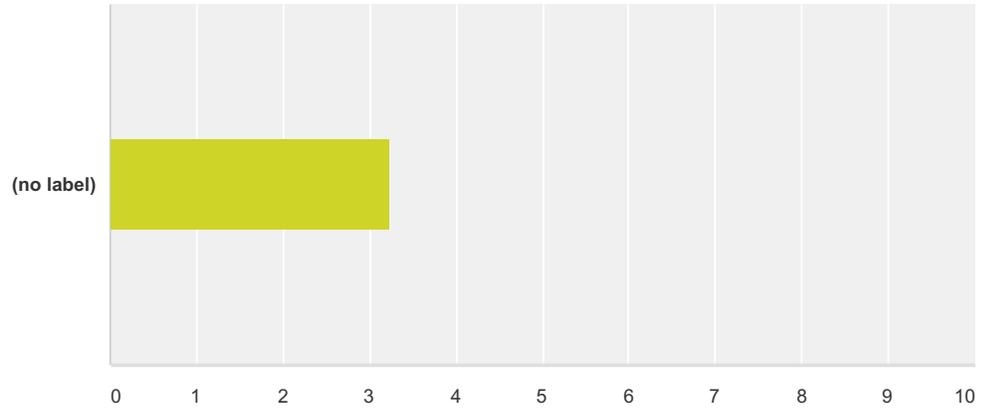
Answered: 2,316 Skipped: 1,146



	Strongly Disagree	Disagree	Neither Agree or Disagree	Agree	Strongly Agree	Total	Weighted Average
(no label)	10.36% 240	20.34% 471	13.08% 303	49.14% 1,138	7.08% 164	2,316	3.22

Q5 The proposed rule clearly defines opportunities for identification of students as gifted.

Answered: 2,312 Skipped: 1,150



	Strongly Disagree	Disagree	Neither Agree or Disagree	Agree	Strongly Agree	Total	Weighted Average
(no label)	10.25% 237	19.59% 453	13.84% 320	48.75% 1,127	7.57% 175	2,312	3.24

Feedback Survey on Proposed Operating Standards for Gifted Education

Q6 Do you have specific changes for the proposed rule related to identification?

Answered: 864 Skipped: 2,598

#	Responses	Date
1	My concern with the policies as presented in this survey is that they are not compared with existing policy. This makes it look as if we are being deliberately given incomplete information, so as to increase likelihood of approving the proposed policies.	11/7/2015 4:48 PM
2	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/7/2015 4:44 PM
3	Adding more testing on top of state testing and current gifted testing takes even more time away from teaching	11/7/2015 4:36 PM
4	Want to keep current language in place	11/7/2015 4:07 PM
5	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/7/2015 3:51 PM
6	The specific general language that currently exists in the current operating standards is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Incorporate the deleted language from the identification section required in ORC and which exist in the current operating standards. Reinstate language in current operating standards 3301-51-15 section A.	11/7/2015 3:35 PM
7	Is there a typo saying that schools have to do one whole-grade screening in grades K-3 and one whole-grade screening in grades 3-6? They can do one whole-grade screening in grade 3 and meet both requirements. No acceptable. Early identification is crucial so that young gifted learners do not waste the first fourth of their time in public school. Whole-grade screening is necessary so that young students who many not be "teacher pleasers" and those not from the majority culture are not overlooked. There has to be at least one whole-grade screening in grades K-2 as well as grades 3-6.	11/7/2015 2:06 PM
8	This sets guidelines for the identification of gifted students, but it lacks support for students that are identified as gifted. I believe this needs to be revised to include basic guidelines for all schools in Ohio to have gifted students supported by staff and teachers that are educated in teaching and advancing our gifted students. Many gifted students that are not adequately challenged in the school setting tend to become behavioral problems. We need to look at a rigorous standard for both staff and students who are identified as gifted, so they can learn at an adequate level. This should be the basic level of service in all schools in Ohio. Our level of education in Ohio has been lacking for many years. It is time for our state to move forward and become a leader in positive educational experience. It would improve our future work force and our states future opportunities. Let's move forward in educating our children so we can improve the future of all Ohians.	11/7/2015 1:09 PM
9	1) Include "valid and reliable" when mandating any screening and/or assessment devices 2) Include language ensuring informed parental consent for gifted identification	11/7/2015 12:41 PM
10	Testing in grades K-3 should be limited to Superior Cognitive and Specific Academic reading and math. Additionally, incorporate the deleted elements from the identification section that re required in ORC and currently exist in the current operating standard. Please reinstate general identification and service definitions as outlined in the current operating standards 3301-51-15 Section A. This will provide clarity to districts.	11/7/2015 12:38 PM
11	Keep the original -- this revision is disastrous.	11/7/2015 12:29 PM
12	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/7/2015 11:48 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

13	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/7/2015 11:48 AM
14	Provide the level of service you gave my older brother.	11/7/2015 10:50 AM
15	Use the present criteria. Expand identification.	11/7/2015 10:38 AM
16	There are no timeframes for how long a school may take in testing and apparently no guidance for identification that is based on any criteria other than a test.	11/7/2015 10:15 AM
17	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/7/2015 9:47 AM
18	More clarity is needed to help guide process of identification, while the mandate to whole grade assess is NOT Why the need to whole grade assess twice in a student's career, let alone once? If one time, grade 3 makes sense, but NOT in the areas of science and social studies Currently a central office administrator in district with a number of responsibilities, including gifted, my licensure and background spans almost 20 years in the field of gifted education, first as a gifted intervention specialist and then as a gifted coordinator serving multiple districts. School districts have very different needs. It would be beneficial to look to national gifted organizations and best practices for both gifted identification and gifted services.	11/7/2015 9:36 AM
19	The draft rule provides virtually no guidance whatsoever. Districts are already doing nothing or very little to identify gifted children, particularly poor children and children of color. I suggest you go back to the previous rule and enforce the law.	11/7/2015 9:09 AM
20	The current rule was clear. Please reinstate general identification and service definitions as outlined in current operating standards to provide clarity to districts.	11/7/2015 8:47 AM
21	The identification of gifted students needs to be followed by a mandate for districts to provide an appropriate education to gifted students. What is the point of identifying them, if nothing else changes? Ohio should ensure that all students get an education that is an appropriate match to their skills and abilities, gifted included.	11/7/2015 8:20 AM
22	Testing should be mandatory at every grade level.	11/7/2015 7:26 AM
23	Revise the whole grade testing from K3 to K2. Reinstate the current identification and servicing procedures.	11/7/2015 12:47 AM
24	It is not clear if the proposed rule is entirely replacing the current rule? It seems it would be more clear and of better service if the current elements for the identification section in the current operating standards remained and for the proposal, revise whole grade testing from K-3 to K-2. Additionally, limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. The general identification and service definitions (as outlined in current operating standards 3301-51-15 section A) provide more clarity to districts than the proposed rule. Please retain the current definitions.	11/6/2015 10:54 PM
25	Keep the current guidelines.	11/6/2015 10:27 PM
26	I feel that having the grade bands of K-3 and 3-6 could possibly lead for districts to have two testing sessions in the third grade and use these to fulfill the third grade reading guarantee testing. As research shows that early identification leads to being able to better begin to grow gifted learners I feel that testing in the K-2 grade band in the areas of cognitive ability, reading and math would be more appropriate. These are the areas where most of primary instruction occurs and therefore it would be appropriate to test in these areas at that point. In the grade band of 3-6 I feel we should test for superior cognitive ability as well as in all four subject areas to reach students in all areas of the curriculum. Having two whole testing bands allows for students who may have had later development of cognitive ability in all areas to be identified and hopefully served.	11/6/2015 9:10 PM
27	In our district, students who miss the one testing date are ineligible for services. It would be great if there was at least one make up day. I understand that, as of now, services are provided at the willingness of the district, so criteria regarding this issue would be helpful.	11/6/2015 8:41 PM
28	In my district, NO accommodations for ELLs such as extended time. The way I read the rules, that should be the case.	11/6/2015 8:10 PM
29	The rule is too broad and allows too much leeway for districts to continue to underserve the gifted population. Identification and services should start in Kindergarten and should include full time gifted classes vs pull out enrichment that doesn't adequately serve the unique needs of the gifted and twice exceptional community. If we continue to push gifted education to the side as elitist and with the mind set that gifted students will thrive no matter what, we risk losing the potential leaders, dreamers, scientists, artists and visionaries, etc., of the future.	11/6/2015 8:05 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

30	Keep the current identification and testing standards, especially the requirements that school districts must use an identification test from the approved list from the ODE. Without specific tests that can be given, school districts could define for themselves what gifted means via the testing methods they choose. Without a standard means of identification, gifted students around the state may or may not be identified depending on which school district they are in. The new standard would fail to meet the needs of gifted students statewide.	11/6/2015 8:03 PM
31	As the Gifted Director for our district I do support these new testing requirements in the Sept. 2015 Gifted Operating Standards Draft: • Two whole grade screening opportunities, however: it would be better for districts if: -\1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. -Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 7:33 PM
32	We shouldn't limit the nomination for testing by specifying parents, teachers or another student. I am a parent volunteer and after some time many students openly volunteeet info, or seek out an adult for conversation. There maybe other family, friends or even the student themself. Gifted children often don't feel like they fit or connect with regular classmates. We should leave requests for testing from anyone. Librarians, girl scout troop leaders, after school piano teacher, coaches, recreation and park centers with after school programs.... it takes a village to raise a child, and children act differently in different surroundings. We are testing the entire population at times, so if a choir director or church leader contacts the school, maybe the referral could be directed to a gifted specialist to arrange the testing. They could interview the student, inviting parent and teacher for their input.	11/6/2015 6:44 PM
33	That any child identified gifted in any area should be given an opportunity to have enrichment.	11/6/2015 6:35 PM
34	As a parent of a child who was identified in testing in Kindergarten, and has been in the gifted program for 4 years, I am very concerned that the proposed rule largely strips out (or fails to include) any clear standards for early identification. For example, I have a second child -- now 2nd grade -- who appears to be on a gifted track also. The rule would be devoid of specific language creating accountability for how students are tested, identified, and brought into the program at these earlier grades.	11/6/2015 5:51 PM
35	Changed the list to OR instead of AND. A child might be gifted in math but not reading (that is especially true for ESL students). Someone who lived in a forign country or following a different religion might not be able to pass the social sciences for lack of assumed background. Item 6a uses AND instead of OR. And my kids have been denied their math level because they could not reach the gifted level in English when they have been in a foreign land for five years and the International English schools there had to cater to the natives and teach at a very basic level.	11/6/2015 5:49 PM
36	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 5:47 PM
37	Please do not change current standards. Districts need specifics	11/6/2015 5:30 PM
38	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 5:22 PM
39	NA	11/6/2015 5:13 PM
40	the whole grade testing is confusing to me. My kid already is in gifted so would they have to keep taking the test every year and what if one year my kid does not do well? does he get removed from gifted? he has asthma which can very much affect his test taking depending on when the test is given and his condition at the time.	11/6/2015 5:12 PM
41	Be more specific on when and what makes up an acceptable test. Our child scored the highest scores possible on math assessments for 8 consecutive tests from kindergarten to 2nd grade, however he missed the gifted guideline by 1 point. Districts should be required to be flexible in their assessments.	11/6/2015 5:02 PM
42	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 5:00 PM
43	List grade 3 in only one grade band, or else allow for only 3rd grade testing. In primary grades, only test Math and Reading, or include alternate methods other than standardized tests. Ensure opportunities for underrepresented populations to be identified.	11/6/2015 5:00 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

44	Requiring two tests of a district to identify a gifted student but not providing any help meeting the needs of that student sounds hollow. My son is gifted and we have a gifted program but I see no effort being made to teach him near his abilities.	11/6/2015 4:54 PM
45	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 4:48 PM
46	The current operating standards are a lot more specific, which I think is better.	11/6/2015 4:43 PM
47	It should stay the same as it was before	11/6/2015 4:20 PM
48	The teacher involved must be more aware of identifying and extending the educational value of the identified gifted children.	11/6/2015 4:18 PM
49	The proposal does indicate the need to identify gifted students and the testing cycles. However, the parameters of the testing are only referred to. I would like to see the specifics of the testing.	11/6/2015 4:15 PM
50	Keep the current specific language to keep districts accountable.	11/6/2015 4:07 PM
51	The specific language in the current operating standards has been removed, making it easier for districts to find loopholes for identification. The proposed rule should keep the original wording for identification and service.	11/6/2015 4:03 PM
52	It doesn't specify what kinds of assessments the districts can use. It refers, instead, to any test deemed acceptable by the DOE.	11/6/2015 3:56 PM
53	Yes, the whole grade screening required for superior cog tests is just one more test our students have to take, when it is not necessary for many. Require it in K - 3, and then as needed after.	11/6/2015 3:51 PM
54	It seems the proposed rules do not offer any guide of guidance which would make sure that school systems follow the best practices in the teaching of gifted students. In fact, all of the wording regarding the specifics in the Revised Code has been removed. All of the "best practices" language has been removed. Glad that whole grade testing is more expansive but early grades testing is haphazard and can be improved, especially for the under-identification of unerrepresented populations. I think that whole grade primary testing could be limited to superior cognitive and math or reading but the deleted Revised Code identification section needs to be put back into the proposed rule. In fact, I would leave the Revised Code standards as they currently are.	11/6/2015 3:38 PM
55	No specific changes but need to support the under-represented student population.	11/6/2015 3:24 PM
56	Gifted services, and requirements and stipulations for such, should be directly linked to gifted identification. Gifted identification does not adequately support the student; only changes to educational experiences and content will adequately support the student. These experiences also need to be tied directly to an individual qualified to work directly with gifted students so that the student is supported in social/emotional development as well as academic and intellectual development. A child will not develop to his/her full potential without appropriate support in their social and emotional development as well.	11/6/2015 3:18 PM
57	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded which is good, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations.	11/6/2015 3:18 PM
58	The question as to whether the rule is clear or not is irrelevant when the rule is not a good one. Gifted identification is crucial especially at the early stages of education. I would propose at best increasing the opportunities for identification and at worst maintaining the current schedule of evaluation.	11/6/2015 3:08 PM
59	The screening should be done starting in kindergarten. My children were identified at 4yrs and they were able to work at an appropriately challenging level for their academic abilities beginning in kindergarten. They would have been absolutely bored had they not be identified early, and my son would have been disruptive to other students. But, because he was appropriately challenged he is succeeding in school.	11/6/2015 3:02 PM
60	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC.	11/6/2015 2:50 PM
61	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 2:38 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

62	I feel we need to revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, we need to incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. In addition, I believe we need to reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 2:37 PM
63	No	11/6/2015 2:26 PM
64	This rule takes out what is currently in place to encourage districts to do what is right by testing student for identification. Testing bans should be k-2 and only screen for cognitive and specific academic areas of reading and math. That way districts are not taking hits on their report cards for science and social studies as well and it eliminates some testing for students. Identification and service language must return so that districts are reporting the same data to the state.	11/6/2015 2:22 PM
65	Need to better define what gifted student is.	11/6/2015 2:19 PM
66	reinstate general identification and service definitions as in current standards 3301-51-15 section A to maintain clarity. Revise the testing from K-3 and 3-6 to K-2 and 3-6. Make k-2 band superior cog. and math and reading only.	11/6/2015 2:19 PM
67	Keep the detailed ways for identification that Ohio currently has in place.	11/6/2015 2:16 PM
68	Individual testing (versus a group administration) should be used for younger students.	11/6/2015 2:06 PM
69	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. I recommend the following: 1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 1:59 PM
70	Gifted students need more group and individual services by specific teachers who are trained in talented and gifted and working with only the talented and gifted. Gifted students need more resources.	11/6/2015 1:43 PM
71	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 1:25 PM
72	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 1:21 PM
73	The K-3 blanket testing in all content areas is a concern. "Districts must ensure that screening and identification procedures for gifted students are comprehensive, consistent and inclusive" is vague. There lacks any guidance from ODE in terms of how this will be carried out.	11/6/2015 1:07 PM
74	Rule standards from ODE should clarify the ORC requirements to enable districts to better interpret and apply the law's requirements and to provide guidance for Ohio's schools. This rule provides generalities, ignores parts of ORC and does NOT give districts adequate guidance. The generalities in this document will not ensure that districts understand ORC requirements and do not include ODE's recommendations and research-based best practices guidance. Many district personnel only refer to the "Rules" and will not be aware of ORC provisions if they are not restated here. Both need to be in agreement. 1) The proposed rule eliminates gifted identification definitions found in ORC as well as identification and service requirements as provided in the current gifted operating standards. Please include them here. 2) A previous draft of the gifted operating standards included recommendations for whole-grade screening in specific grade bands and subjects. This will be good for all students, especially those from minority groups and disadvantaged populations. Please revise this section to require K-2 whole-grade screening in Superior Cognitive Ability, Math and Reading, and in grades 3-6 for Superior Cognitive Ability, Math, Reading, Science and Social Studies. 3) Restate all sections regarding gifted identification and services from ORC in this document. Sections such as testing transfer students at the parent request have been omitted and need to be included.	11/6/2015 1:04 PM
75	Ensure that parents receive the results of assessments in family-friendly language. Provide formal meetings with groups of parents of children who have been identified to explain how the district proposes to serve students. Notify all parents in the district ahead of time about the assessment and when it will be conducted.	11/6/2015 1:00 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

76	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 12:45 PM
77	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded which OAGC supports, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. 1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 12:15 PM
78	It is more important to test the younger children more often - at least by 2nd grade. Waiting until 3rd grade increases the risks that kids will fall through the cracks and lose interest in learning.	11/6/2015 12:09 PM
79	It should be more clear that the opportunities to take gifted testing be easily accessible. Some districts offer the testing on weekends when students may have problems with transportation. The testing should be given during a regular school day. And guidance counselors should follow up to make sure absent students are offered a make up test. By giving the test on a weekend or after school, the results are being skewed in favor of students who have access to transportation, available after school time, and involved parents.	11/6/2015 12:01 PM
80	The law is unclear and allows for too much ambiguity.	11/6/2015 11:54 AM
81	There should be clear cut offs for gifted ed. My district added "high scoring" students so they could keep the gifted units. AKA justify the use of space.	11/6/2015 11:54 AM
82	1.Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2.Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 11:44 AM
83	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 11:40 AM
84	Not specific enough. Too generalized.	11/6/2015 11:32 AM
85	The BOE should follow its own Board Policy adopted in June, 2003 which was based on the work of the Gifted Task Force report, Gifted in the 21st Century. The Operating Standards should: 1) ensure that gifted students will have equitable access to needed services, regardless of where they live; 2) policies at the state and local level will align with the needs of gifted students; 3) all levels of the educational system will have highly qualified personnel who understand the needs of gifted students; 4) accurate identification will include appropriate representation of students from ethnic and minority groups; and 5) - from the Task Force Report - children identified as gifted will receive appropriate services in appropriate settings. The proposed Rule does not clearly define identification. Districts are receiving more state funds for purposes of identification, yet the number of identified students has dropped. Requiring districts to whole grade test in K-2 for superior cognitive ability and reading and math, and in grade band 3-6 for all areas of identification would be a good start in finding gifted students who are in poverty or are twice exceptional and not likely to be referred by teachers or others for testing.	11/6/2015 11:26 AM
86	In my opinion, achievement tests should not be the determining factor for gifted identification in all schools. Achievement is in large part tied to exposure. A student may be cognitively gifted, but have not been exposed to the same quantity and quality of instruction as many upper income children, whose families and schools rigorously expose them to large quantities of information and academic skills. By nature of quantity/quality of exposure, a slightly above average upper middle class student might outperform a highly cognitively gifted student from a poorer, underperforming school on a standardized achievement test. This standard then has built in bias against certain underserved gifted children who will continue to go unidentified, while slightly above average kids are viewed as gifted and offered even more learning opportunities.	11/6/2015 11:22 AM
87	1. Limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 11:18 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

88	Attention should be given to under-represented student populations.	11/6/2015 11:17 AM
89	If they are identified gifted, then they should be serviced with schools getting funding to adequately support this.	11/6/2015 11:10 AM
90	There is no defined process for identifying giftedness in creative and performing arts, although those categories exist. This substantially skews the results and leaves a large cohort of gifted children unidentified and unsupported.	11/6/2015 11:08 AM
91	I think there should be global testing - studies have shown that disadvantaged gifted children are often passed over and not put in programs simply because they aren't identified. Relying on teacher or parent requests skews the population demographics.	11/6/2015 10:58 AM
92	In reviewing the previous version of this section of the Ohio Administrative Code, it seems that too much may have been removed. Certainly the new version is more concise; however, I am concerned that it may leave too much open and that districts will not be priority (also, am I missing that parents will be notified within 30 days of identification from assessments - what timeline is put on notification now?). I have not kept up on this change much and I wonder why so much has been removed.	11/6/2015 10:47 AM
93	This is yet another move that will produce a decline in gifted services and could allow a district to only test once during the elementary years to identify gifted students. That is not in the best interests of the students.	11/6/2015 10:45 AM
94	Services and identification should be in additional areas other than math and reading.	11/6/2015 10:43 AM
95	The verbiage is vague and does not indicate or include by mandate true measures of giftedness.	11/6/2015 10:43 AM
96	Families and educators need to continually advocate for gifted identification of our students. This is best practice. Only relying on periodic whole grade screening will miss students, especially those who might be more transient, underprivileged (as families are often uninformed), and/or poor "large group" test takers.	11/6/2015 10:36 AM
97	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 10:34 AM
98	I do believe that gifted students should receive their instruction from teachers certified specifically in advanced or gifted studies.	11/6/2015 10:27 AM
99	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 10:26 AM
100	As written, the rule would permit districts to offer a single screening in 3d grade and puts the onus on students/parents to request otherwise. While the previous rule did not, to the best of my understanding, require the use of explicit gifted identification testing, it did require ongoing evaluation of students based on standardized test scores. It would be preferable to do both, and to specify, for example, grade bands of K-3 and 4-6, to ensure that students have more than one opportunity to be identified.	11/6/2015 10:25 AM
101	Limit the testing in the K-3 grade band to superior cognitive ability and specific academic areas of math and reading. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 10:25 AM
102	No mention of Visual or Performing Arts for Identification. No mention of Leadership for Identification.	11/6/2015 10:24 AM
103	Opportunities for all grade levels	11/6/2015 10:23 AM
104	I have read that the tests used to identify giftedness tend to be biased towards white, native born children, while children of minority ethnicities may not be understanding due to the way the material is presented.	11/6/2015 10:22 AM
105	Grade 3 appears to be included twice in the whole year testing portion of the proposal.	11/6/2015 10:18 AM
106	We would like to keep the existing Ohio codes for gifted identification and we need the regulation controlled by Ohio department of education. We do not want districts to take independent decisions on gifted identification and intervention. It needs to be controlled by a state agency (ODE) and cont Niue to be funded by the state. We believe that the proposed rule to give this choice to local districts can undermine the quality of education public schools offer and can seriously damage the states intellectual potential in training. America needs to bring up the intellectual power within the country. We need funding, monitoring the process and support from the state government agencies on this matter.	11/6/2015 10:14 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

107	1.Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2.Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 10:12 AM
108	Reinstate minimum service minutes for students from current operating standards along with caseload limits (without the sunset provisions) from the draft of the gifted operating standards approved by the State Board of Education Achievement Committee (11.11.13 draft). 2.Reinstate and improve service and instructional settings as provided in the current standards and adjusted to some extent in the 11.11.13 draft. 3.Remove the provision that untrained general education teachers provide service unless it is an accelerated classroom as outlined in the 11.11.13 draft. 4.Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5.Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC). 6.Reinstate instruction time requirement for teachers from current standards. 7.Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated inORC. 8.Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 9.Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPS. 10.Revise whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that is required in ORC and which exists in the current operating standards.	11/6/2015 10:04 AM
109	Give it more teeth. MANDATE gifted all-day programs in ALL districts and provide funding for them. Provide teachers with money to get certified in gifted education.	11/6/2015 10:04 AM
110	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 9:55 AM
111	Whole-grade screening should be required in the K-2 grade band. The earlier gifted students are identified, the earlier their personalized educational journey will begin. Also, this will impact the gifted indicator for the district. Whole-grade screenings will help to find gifted students in the underrepresented populations.	11/6/2015 9:44 AM
112	We are relying on testing to show giftedness. What about those children who are gifted yet have test phobia?	11/6/2015 9:29 AM
113	Reinstate identification and service definitions as outlined in current operating standards 3301-51-15 and adjusted to some extent in the 11.11.13 draft.	11/6/2015 9:19 AM
114	Reinstate identification and service definitions as outlined in current operating standards 3301-51-15 and adjusted to some extent in the draft passed by the State Board of Education Achievement Committee on 11.11.13.	11/6/2015 9:14 AM
115	It is vague and subjective. I wish the state would try to provide more specific guidelines for identifying gifted to at least establish minimum criteria and then if the district wants to broaden its definition of gifted to include more kids that would be good.	11/6/2015 9:04 AM
116	The current rules are fine. Add to the current rules about some need for flexibility.	11/6/2015 9:01 AM
117	The gifted program is running well, and there needs to be some changes. Gifted students tend to go beyond other students, so there needs to be guidance to support identification of gifted students. Gifted program specialists have help me, as well as other students faster and more efficient then other teachers. Gifted program has been a great help to me, and a majority of the students in my gifted class has probably has said this too. The gifted program needs more funding, gifted classes have been identified, and should deserve all it's supplies as well as better working technology.	11/6/2015 8:48 AM
118	No.	11/6/2015 8:47 AM
119	I believe that identification is fair.	11/6/2015 8:43 AM
120	Yes, I do have specific changes for the proposed rule related to identification.	11/6/2015 8:42 AM
121	I do agree that gifted education has gone well, but some changes should be made. I believe that gifted teachers should be more accepted in terms of getting supplies needed for gifted students. Also, I believe that gifted students should be taught by teachers qualified for gifted. Otherwise, the students are not challenged enough.	11/6/2015 8:41 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

122	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 8:29 AM
123	Restore the specific elements from the current standards for identification of gifted students. This would ensure that all districts have clear unambiguous directions and meet specific service definitions	11/6/2015 8:03 AM
124	I believe that the schools are only identifying, but cannot afford to support gifted students in an actual program. Gifted students are being ignored by our education department. When will it matter that we educate appropriately our brightest kids? Will it ever?	11/6/2015 7:44 AM
125	Keep the current rules - gifted education is as important as special education.	11/6/2015 7:23 AM
126	Keep old language it was more descriptive and helpful	11/6/2015 6:41 AM
127	The change to this language does not provide depth to define what "gifted" is and how determined for the student. These terms are very basic leaving it up to the district to put them in a "gifted" category. It also removes detailed district terms and guidelines that gifted students need. Gifted learners are not just a straight A student, they are students who need instruction with depth and rigor in order to excel in the classroom.	11/6/2015 6:17 AM
128	I think there is a typo in the section about testing- one test per year grades k-3, then should it say one per grade band 4-6, rather than 3-6?	11/6/2015 5:58 AM
129	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded which OAGC supports, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. 1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/6/2015 12:08 AM
130	The testing grade bands should include K-2 using cognitive, reading and math exams and 3-6 including cognitive testing and all four academic areas. This allows for the early identification in areas which are most often served and adds the additional areas in grade levels where service may become available. I also feel that the general identification and service guidelines should be included to give more specification on service requirements for districts.	11/5/2015 11:03 PM
131	Information on opportunities for testing/evaluation should be given to the parents annually, either in writing or by email, not just available on request or if parents look for it (i.e. On the district website, in a handbook, etc)	11/5/2015 10:39 PM
132	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/5/2015 10:27 PM
133	These rules are too vague & are left up to the judgement of people who are not educated about gifted identification or the needs of gifted students.	11/5/2015 10:23 PM
134	No	11/5/2015 10:20 PM
135	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/5/2015 10:13 PM
136	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded which OAGC supports, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/5/2015 10:03 PM
137	Keep the specific language in the current operating standards to ensure that districts follow best practices.	11/5/2015 9:57 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

138	What about identification in the arts? The rule is ignoring an entire population of gifted students.	11/5/2015 9:38 PM
139	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/5/2015 9:26 PM
140	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/5/2015 9:21 PM
141	Yes, test the students according to their potential ability. Not all students are fluent on a computer for testing. And the test questions at their cognitive ability is most likely not age appropriate for every student. Social situations, family dynamic, and more just aren't relevant to their very logical world. Giftedness is not equal to high achieving. They have special needs that require services for them to achieve at their level. The basic standard is obsolete. They need more. Require more. Not more repetition! Not more standard curriculum. Their pace of learning is individual. Please don't hold the back.	11/5/2015 9:11 PM
142	The changes neglect to mention of visual/performing arts.	11/5/2015 9:10 PM
143	It's good that it allows for adjustment for iep. Glad it requires under 3rd, too. Only requires submission to state? Do they approval or accountability?	11/5/2015 9:07 PM
144	Please reinstate identification and service definitions as outlined in current operating standards 3301-51-15 and adjusted to some extent in the 11.11.13 draft.	11/5/2015 9:07 PM
145	Testing at the primary level should only include superior cognitive ability, reading, and math. Clear identification and service definitions are needed.	11/5/2015 8:51 PM
146	It appears to me that testing could be delayed until 3rd grade. I think children should be tested earlier than that. My children needed services as early as 1st grade.	11/5/2015 8:38 PM
147	If the intent was to simplify the document by removing descriptions provided in ORC 3324, you may consider the extra work conscientious districts will take to correlate law and rule as they have typically turned to the rule for explanations of how to implement the law, which actually de-simplifies the document in practice as districts will now have to turn between the two documents to do it "right" if they are so concerned. It could also mean a complete free for all for districts that hold the rule as the comprehensive guidance document and assume it clarifies law. If this simplified version stays one would hope that a comprehensive technical manual would do the correlation as needed AND that there would be oversight by the agency to ensure the LAW is being followed. The change I would propose would be to re-insert the descriptive pieces from the law.	11/5/2015 5:11 PM
148	If it isn't broken; then don't fix it!	11/5/2015 4:53 PM
149	Leave the funding, staff, and opportunities available for the gifted students. Spend the time, manpower, and funds this movement has cost everyone on more pressing matters: how about figuring out what test is best for all Ohio students to take? Note, test was not plural. Too much of our students time is WASTED on preparing for tests that do not count towards anything. All of the mandatory testing is not a true reflection of what our children know, are learning, nor does it reflect what the children need to know in order to become successful adults. Let the teachers teach the material the students need and go back to one big test a year. More tests do not equal better students!	11/5/2015 4:50 PM
150	I would like to see standardized testing benchmarks to identify students on the new common core tests which would help identify students across grade levels every year the tests are administered. I listened in about the new tests being developed for common core (to replace the portions of PARC testing) but am not hearing anything about gifted ID benchmarks.	11/5/2015 4:30 PM
151	Testing for gifted services adds additional testing to students.	11/5/2015 4:06 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

152	The proposed rule needs changed to whole grade testing in grade K-2 and 3-5. In the K-2 group, only cognitive testing and reading and math testing need to be considered. In my district, science and social studies achievement testing in grade 2 gives us data that does not reflect the child's ability in these subject areas due to the content covered at this grade level. I would rather see science and social studies tested in a higher grade level. The proposed rule has left out the general identification and service definitions that are in the current operating standards, and I think this information is critical to ensure that school districts follow best practice when identifying and servicing all gifted students (which includes under represented populations (ELL, low socioeconomic, twice exceptional etc.). I have taught gifted for over 30 years, and it wasn't until the current operating standards were developed, that I felt there was consistency in the identification and servicing of my students. The standards guaranteed that student identification was standardized (in my district and across the state), and service recommendations created guidelines and options that my district now utilizes to meet the needs of our gifted students.	11/5/2015 3:51 PM
153	I feel it's important that there be more specific language for the gifted qualifications. I prefer the previous standards and language.	11/5/2015 3:43 PM
154	This is fairly open ended but I suppose sets some guidelines on how to identify gifted students. It does not however specify an auditing process to ensure the data provided to DOE is accurate or verifiable. Nor does it mention anything related to who will implement the identification, let alone any requirements for instruction of students. This is way too full of loopholes for underfunded areas to exploit and does not contain enough mention of support so they do not have to do so.	11/5/2015 3:38 PM
155	No	11/5/2015 3:34 PM
156	Will funding be provided for testing opportunities?	11/5/2015 2:44 PM
157	Compared to the previous standards, the language of the proposed rule is vague. Previous standards indicated which specific assessments were acceptable. The previous standards also specifically addressed the processes of reassessments and appeals (these are not even mentioned in the proposed rule). There should be guidelines regarding children who are likely gifted but who do not meet test cutoffs on the first try. There should also be guidelines for districts regarding appeals by parents. Also, it appears that gifted identification in the areas of visual and performing arts and creative thinking has been eliminated.	11/5/2015 2:43 PM
158	Reinstate identification and service definitions as outlined in current operating standards 3301-51-15 and adjusted to some extent in the draft passed by the State Board of Education Achievement Committee on 11.11.13.	11/5/2015 2:34 PM
159	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded which OAGC supports, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented students and populations. Changes 1.) Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2.) Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/5/2015 2:17 PM
160	identification is about more than objective measures of IQ- there are additional considerations and it is as individualized as children with a disability	11/5/2015 12:42 PM
161	This survey is being completed by the Ohio Alliance for Arts Education (OAAE). Restore the definitions in current Rule 3301-51-15 (A) including the definition of "gifted" and "visual and performing arts," and specific language about the identification of students in the current rule (C). The proposed draft rule (9/15/15 version) for gifted education streamlines the standards by eliminating duplicate language from the Ohio Revised Code (ORC) and clarifications of the law, but as a result the proposed rule is rather vague. According to our members, who work with districts and teachers to identify and serve gifted students, there is a lot of variability among school districts regarding the identification of students who are gifted. The provisions removed from this section provided school districts, parents, and the public with examples of best practices that increased understanding and transparency about the identification process. The lack of detail and examples in the draft rule could increase the potential for misinterpretations of laws and rules. Local school districts need more detail about implementing the laws to ensure equitable ID measures across the state. On a positive note, the proposed standards expand whole-grade testing for identifying gifted students, including students with disabilities, students who are learning English, or students who are a minority or disadvantaged.	11/5/2015 12:09 PM
162	Revision of whole grade testing from K-3 and such should be limited to testing this initial grade band to superior cognitive ability and specific areas of reading and math only. Additionally, the deleted items from the identification section required by the ORC should be reinstated. Such exists in the current operating standards. General identification and service definitions should be reinstated as outline in the current operating standards in order to provide clarity to all of the districts.	11/5/2015 11:43 AM
163	My concern is not identification, but that services are not provided once children are identified in my district.	11/5/2015 11:08 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

164	Specific definition for giftedness criteria needs to be included.	11/5/2015 10:31 AM
165	No identification criteria provided.	11/5/2015 10:31 AM
166	The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources.	11/5/2015 10:12 AM
167	The wording is vague and makes it seem like any test will do.	11/5/2015 9:45 AM
168	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded which we support, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/5/2015 7:01 AM
169	More specific requirements for school districts regarding exactly what services they MUST offer would be valuable. The current offerings at our school district change like the wind, from year to year, from grade to grade. As a parent it would be nice to know what to expect for my child in each subjects. Currently there are no gifted services for science and social studies until high school.	11/5/2015 6:58 AM
170	Districts must ensure that screening and identification procedures for gifted students are comprehensive, consistent and inclusive. How is this measured. It is very obscure.	11/5/2015 6:05 AM
171	District must provide notice to all parents in writing before testing and to explain the results to all parents.	11/4/2015 10:33 PM
172	Revise whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that is required in ORC and which exists in the current operating standards. Reinstate identification and service definitions as outlined in current operating standards 3301-51-15 and adjusted to some extent in the 11.11.13 draft.	11/4/2015 10:23 PM
173	Identifying is one thing. Adequately serving then and meeting their needs is another.	11/4/2015 10:16 PM
174	B 3)Remove " or other students" A district should not be required to test a student just because another student referred that student. 6) Remove "including minority and disadvantaged students, students with disabilities, and students for whom English is a second language," As a state and as a society we need to stop calling out special groups. All mean "all." Enough said. 6) b. This item (6b) is an unnecessary burden on the district. The district assures equitable inclusion by meeting the requirement to assessing ALL. If the department thinks something to this effect is needed, then just require district to inform all parents of the operating standard: the districts "conduct yearly at least one whole grade screening in grade band K-3 and at least one whole grade screening in grade band 3-6;" and "districts must provide at least two opportunities per year for gifted identification testing in grades K-12 if students request testing or are referred by parents, teachers".	11/4/2015 10:11 PM
175	1) Reinstate the general identification and service definitions as outlined in current operating standards (3301-51-15 section A) to provide clarity and guidance to districts. 2) Incorporate the elements deleted from the identification section that are required in ORC and which currently exist in the operating standards. 3) Revise the whole grade testing from K-3 to K-2. Limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading.	11/4/2015 10:02 PM
176	In accordance with the OAGC recommendations, the Department of Ed. should: Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/4/2015 9:35 PM
177	Proposed language (B)(1) "identification procedures... are comprehensive consistent and inclusive" has absolutely no meaning. What is comprehensive? Not defined in any way. Whole grade testing should happen in K-2 (superior cog., reading and math) , and 3-6 (superior cog. and other areas). Without this change, districts will test only in grade three and call it done. Districts are allocated adequate funds to do this testing. Return to the language in the current which clearly defines identification criteria in ORC!!!!	11/4/2015 9:31 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

178	Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/4/2015 8:58 PM
179	Teachers should have to have gifted education training this is critical for dealing with gifted children and their unique challenges as well as their emotional challenges. Also, trying to provide services to gifted students without funding the personnel directly to provide it is the same as saying children can learn from the book without the need of a teacher. The funding for gifted needs to be directed to the personnel not just to the identification of students and non-human resources.	11/4/2015 8:29 PM
180	In accordance with the Ohio Association for Gifted Children recommendations, I think the Department of Ed. should: Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/4/2015 8:17 PM
181	more than testing is needed.	11/4/2015 8:07 PM
182	If a student is held back because the parent wants them to be mature more for another year or for sports even though their child is of age, they should not be eligible for EPP - the kids who are held back to test and are EPP identified it's really the age appropriate grade for them anyway. They are not gifted per say. They are just up To their grade level and age. It's crazy the amount of kids parents who hold kids back them are in EPP -	11/4/2015 7:45 PM
183	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/4/2015 7:42 PM
184	It needs to be much more detailed, clear, explicit.	11/4/2015 7:23 PM
185	This is very ambiguous. A standardized recommended test and timing of the testing and clear communication to parents about what these are would be the most helpful to families. Leaving it up to individual schools to decide what tests and when to give them defeats the purpose of identifying gifted learners in comparison to their peers. How do comparisons among different tests work. Children tested at the beginning of the year will naturally not perform as well compared to their peers tested in the middle of the year etc.	11/4/2015 6:55 PM
186	This is ridiculous! You have basically stripped the gifted students all of their previous rights... The handling of gifted students need to be handled by the state not the district and have the same consideration as students who have learning disabilities.... This is absolutely not acceptable and you should be ashamed for trying to getaway with this.	11/4/2015 6:07 PM
187	Discard it and start over with the help of a Gifted Educator and an Association that is familiar with the needs of these students.	11/4/2015 5:22 PM
188	The identification of gifted students is such an important and vital part of the process that it seems like it is being "skimmed over" in this new set of standards. I realize that ORC is referenced, but I do not feel this gives much GUIDANCE to districts.	11/4/2015 4:16 PM
189	Just make sure they are serviced by a highly qualified, certified teacher and that it is not just a worksheet marked enrichment. There must be a program to enhance the talent. Not enough just to identify	11/4/2015 3:36 PM
190	Test only for cognitive ability, reading and math in younger grades	11/4/2015 3:23 PM
191	No	11/4/2015 3:20 PM
192	Districts should be required to submit their screening and identification plans and the specifics of this requirement should be written out in these operating standards.	11/4/2015 3:13 PM
193	School districts should provide for Gifted Services in areas that are identified, not just the identification and then leave it up to the classroom teacher to service.	11/4/2015 3:06 PM
194	Totally agree with OAGC concerns..... 1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/4/2015 2:36 PM
195	Rather than rushing this through, how about we take time to allow a thorough vetting process with everyone affected involved?	11/4/2015 2:17 PM
196	the proposed rule does not include current rule for side by side comparison - so how can questions above be appropriate?	11/4/2015 1:59 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

197	Please elaborate on the opportunities for serving gifted students. Also, it is defined vaguely on methods to identify.	11/4/2015 1:56 PM
198	The description is not clear and not specific to general parents who may be interested gifted programs for their children. We need more specific and directed guidelines so that we are not wasting our time to search or ask for the information.	11/4/2015 1:53 PM
199	I feel Worthington Schools purposely adds an IQ test where it disqualifies many students whose MAP scores identify them as gifted. Sounds like these new standards MAP scores will be all that is needed to identify kids as gifted.	11/4/2015 1:42 PM
200	Specific criteria for identifying gifted students and students should be tested at an early stage.	11/4/2015 1:23 PM
201	Annual meetings need to be held at the district level to discuss options for each gifted child. Currently there is one initial document for the parent to sign with no discussion on proposed options for the individual. Parental input needs to be heard.	11/4/2015 1:21 PM
202	After a child is identified as gifted, annual meetings with parental input need to be held at the district, not school, level to ensure parents' expectations are met for their child. Currently students are only offered whatever the school is offering even when the plan is not compatible with their student.	11/4/2015 1:13 PM
203	In my experience, our local public school didn't know how to go about identifying our son who also happened to be on an IEP for speech and written communication disorders. They were either unaware or unprepared for appropriate testing for him.	11/4/2015 12:33 PM
204	My child received a gifted in language arts letter in 3rd grade. He's is now in 5th and continues to test way above average. I have received emails regarding extracurricular ideas for him but nothing within the normal school day. I was told the only real option is for kids gifted in math who are able to attend classes with students in higher grades, but language arts does not have that option. I would like to see opportunities for him within the school day. My husband and I both work and it is difficult to fit in after school programs. This is not fair to him or to us as taxpayers.	11/4/2015 11:53 AM
205	Gifted test scores should be communicated to parents. For instance, I didn't know that my child could be identified early as gifted, as his teacher didn't mention it. Each school should send out information along with test scores that indicates if you child scored above x, then they MAY be identified as gifted and you should contact your childs teacher or principal. For first time parents, if the process breaks down at the school, you may not realize that you can initiate the process. Requiring communication from the school to all parents lets those who may have gifted students start the process.	11/4/2015 11:52 AM
206	None	11/4/2015 11:43 AM
207	The framework has been stripped down in such a way that it is too basic and general. My suggestion for specific changes to the proposed rule would be to use the current gifted framework, as written in March 2008, to reduce the vague language that it is present in the proposed revisions. You need to include input from experts in the field and parents of gifted students and not just gut the current gifted framework without consulting the educational communities that will be affected by these changes.	11/4/2015 11:33 AM
208	I support the draft offered by the Ohio Association for Gifted Children.	11/4/2015 11:25 AM
209	It seems the guidelines pigeon hole students into "gifted" for three years when that assessment may change per student on a yearly basis. It also doesn't seem to give students who did not meet the assessment the first go around an subsequent opportunity until three years later unless that opportunity is being pushed by a parent.	11/4/2015 11:22 AM
210	The type of testing needs to be spelled out. What type of cognitive test will used and who will administer them CogAt, Otis- Lennon, WISC, Woodcock Johnson etc. Will there be a school Psychologist involved. This is all unclear and unacceptable.	11/4/2015 11:09 AM
211	The rules are not clear. I would have to research the referenced Ohio Revised Code; thus the rules for identification are not clear in the proposed rule. The rules should be clearly defined within one document.	11/4/2015 11:07 AM
212	Stop using the term "gifted" it is presumptuous and frankly insulting.	11/4/2015 11:06 AM
213	We need to include specific requirements on how you will support gifted students - there needs to be special instruction given to these students and it needs to be required in this rule. Its not enough to merely test them and identify these students as gifted. It is our responsibility to teach them under special curriculums as well. Well off school districts would likely be fine - what about the lower income areas? They need to be supported as well. Also, we need to add that any instructor of gifted children requires special training. That is missing here.	11/4/2015 10:53 AM
214	Need to include course work, teacher and parent recommendations and not base everything on one test.	11/4/2015 10:53 AM
215	Yes. I believe an alternative rubric could be used rather than just test results.	11/4/2015 10:52 AM
216	There are no standards here. Teachers should be certified to teach gifted education. Standards should be set for this type of education and testing. This is not a school by school or district by district initiative. We set standards for other 'special' groups of students...they must be set for this group too.	11/4/2015 10:47 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

217	The specific language has been removed. Please adopt OAGC recommendations.	11/4/2015 10:06 AM
218	Gifted testing should be done every year and not once within K-3 and once within 3-6 grades.	11/4/2015 9:48 AM
219	Students identified as gifted should be served/taught by a licensed gifted educator.	11/4/2015 9:31 AM
220	The language that currently exists in the current operating standards has been removed. This is necessary to ensure that districts follow best practice. Whole grade testing has been expanded, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. Recommendations: 1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/4/2015 9:29 AM
221	Didn't see any indication of "guidance needed to support identification". The rules are so vague and non-specific as to be devoid of standards or even helpful advice.	11/4/2015 9:22 AM
222	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/4/2015 9:14 AM
223	The proposed guidelines don't go far enough in requiring school districts to provide gifted students with appropriate lesson plans. I'm lucky; I live in a school district that understands and supports the need for offering talented kids a chance to learn and explore outside of the mandated course of study. But I fear for kids whose parents aren't as fortunate as we are and that live in school districts that struggle to balance their budgets. This proposal, the way it's written, gives the school administrators an easy out to ignore this minority group	11/4/2015 8:50 AM
224	The gifted instructor needs to be specially licensed. There need to be clear guidelines of what districts need to provide these children. Poorly funded districts need to be able to provide the same level programs for gifted children, as affluent districts. The State Board of Education needs to listen to people who work with the gifted children. I am the mother of a now adult child, whose life has been so very positively impacted from the gifted classes he was fortunate to attend. This is a very important issue!	11/4/2015 8:44 AM
225	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/4/2015 8:34 AM
226	The specific general language that currently exists in the current operating standards has been removed, and this language is necessary to ensure that districts follow best practice and meet the letter and spirit of the Ohio Revised Code. Expanding whole-grade testing is good; however, the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations.	11/4/2015 8:30 AM
227	1.Revise the whole grade testing from K3 to K2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2.Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/4/2015 8:15 AM
228	There is nothing about Identifying minimum IQ's.	11/4/2015 7:55 AM
229	My son struggled in the traditional classroom but is excelling in his TAG classroom. Licensed teachers as well as customized education are essential to help these wonderful children with special needs grow and excell. When my son was reading at 10+ levels above the other kids in his class he felt isolated, was overlooked by teachers, and started to develop negative behavior as well as negative attitudes toward the education system. Mandatory specialized education for gifted children is essential to help them grow into the smart, caring and engaging adults they can be.	11/4/2015 7:47 AM
230	I think the proposed rule is too vague	11/4/2015 7:37 AM
231	As IQ changes, it makes more sense to determine the status on a yearly basis. As it presently stands, many students who are not presently gifted in any realistic sense of the term receive costly services.	11/4/2015 6:51 AM
232	The guidelines that have been outlined for identification are generally described in broad terms. For a district with licensed administrators and intervention specialists, the proposed rule could be implemented with fidelity. The proposed rule relies on this to be true in districts. There should be language that necessitates this within the guidelines for identification.	11/4/2015 5:54 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

233	It is clear when comparing the current rules to the proposed rules that most guidance on all things is removed. The requirement for testing in the specific grade bands is a positive change, but there seems to be a lot of information missing when comparing these rules to the existing rule and the state laws about identification. As a grandparent of a child who attends a district that never acknowledged a gifted-qualifying test score or and who refused to retest my grandchildren based on their own preference despite the rules requiring them to provide two opportunities a year, I cannot see how less guidance will help students.	11/4/2015 5:07 AM
234	I would consult an expert in the field when asking these questions. Certainly someone specialized would be better able to comment on how to best identify gifted children, more so than a parent, or even a principal, (uncertified) teacher, or superintendent.	11/3/2015 11:59 PM
235	As indicated in the message below the standards threshold elements are currently set very low. The revised water down standards makes Ohio among the worst in educational achievements of economically disadvantaged gifted students, including those communities and neighborhoods who are identified as economically disadvantaged populations. Just think, if your child is one of those students caught-up in this gap, Devalue achievement gap where learning is no longer required for them to perform. just look at the numbers. Especially of those children and students coming from quiet poverty stricken area, tucked away in some remote corner of the community that has no voice or rarely seen in this misguided silo plan of thinking.	11/3/2015 11:33 PM
236	I would suggest that you allow teachers and not politicians determine this.	11/3/2015 10:21 PM
237	Need to improve early grade testing and identification.	11/3/2015 9:28 PM
238	The testing should not be "inclusive" of children of illegal immigrants, but should include children of citizens, legal residents, and diplomats. Illegal immigrants should not receive legitimacy or state funds for regular education, much less the perks of gifted education.	11/3/2015 9:09 PM
239	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. 1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/3/2015 8:52 PM
240	Revise the whole grade testing in the lower grade band to K-2 and keep the second band 3-5. Reinstate general identification and service definitions as outlined in the current operating standards.	11/3/2015 7:56 PM
241	Districts should be required to provide more opportunities for identification. Children who move from one building/district to another may miss out on testing due to the nature of the grade band distribution of the testing.	11/3/2015 7:54 PM
242	Please consider reducing the primary screening to math, reading, and superior cognitive ability. During a time when parents and students want testing reduced, we might consider this concern. Intermediate testing could also be reduced to those 3 areas. Districts should be allowed flexibility.	11/3/2015 7:35 PM
243	6 items per year instead of 2	11/3/2015 7:29 PM
244	Testing in all 5 areas in the primary grades could be reduced to math, reading, and superior cognitive ability. In the intermediate grades testing in science and social studies could be based on referrals. Testing should be reduced, if possible.	11/3/2015 7:12 PM
245	Specific language is necessary to ensure that districts follow best practices. The general identification definitions and service definitions in the current operating standards do a much better job at providing clarity to districts.	11/3/2015 7:01 PM
246	You aren't showing us how the rule is changing. Specifically, what in the old language is being removed and what new language is being added. Parents need to be able to see exactly how the rule is changing if they are to adequately assess whether or not they think the changes are helpful. Because of this fault with the survey, I have to mark strongly disagree.	11/3/2015 6:53 PM
247	I would like to see the language from revised code included in the new gifted operating standards (i.e. the language that spells out the criteria for gifted identification) instead of just referring to Ohio Revised Code 3324. For parents, teachers, and admins, it is nice to have it all spelled out in one document without trying to wade through Ohio Revised Code.	11/3/2015 6:44 PM
248	Which tests will be acceptable for the screening? Will the test be standardized, reliable, valid, field tested etc.? Cognitive Aptitude vs. Achievement Test? There should be a "short list" of tests determined by gifted specialists and psychologists.	11/3/2015 5:41 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

249	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/3/2015 5:33 PM
250	I feel opportunities for identification should be offered more than once a year in every grade level.	11/3/2015 4:23 PM
251	Opportunities for retesting students with borderline scores	11/3/2015 3:28 PM
252	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/3/2015 3:19 PM
253	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/3/2015 3:19 PM
254	PLease keep the guidelines the same. I want licenced specialized teachers for my kids.	11/3/2015 2:26 PM
255	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/3/2015 2:11 PM
256	Request for the following in the Proposed Standards: Language specific to identification areas should be included, as in the current Operating Standards. Whole –Grade testing should be limited to ability, reading and math (other areas by referral). Whole-Grade testing added for K-2 band.	11/3/2015 1:10 PM
257	Eliminate the second screening in grades 3-6.	11/3/2015 12:57 PM
258	Suggestions: Whole grade screening/testing for gifted identification KG-3rd and 4th-6th grades in the areas of math, reading, and cognitive abilities only. Screening/testing in the areas of science and social studies could fall under the referral process. Standardized assessments in these two areas are not well aligned with our new elementary science and social studies state standards. Also there are few if any KG-3rd grade newly published standardized assessments in the areas of science and social studies that could be administered as a whole grade screening to these early elementary grade students.	11/3/2015 12:45 PM
259	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded which OAGC supports, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. I support the following recommendations from OAGC: 1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/3/2015 12:40 PM
260	Because of the high rate of misidentification of students as gifted in science and social studies when tested in primary grades I would suggest testing only for superior cognition and reading and math at the k-3 band.	11/3/2015 12:16 PM
261	Allow current gifted educators and administrators draft a comprehensive plan.	11/3/2015 11:38 AM
262	testing for Science and Social Studies feels like over-testing, especially since many districts don't serve those areas.	11/3/2015 11:35 AM
263	Language could be more specific and should be more focus on early grade testing to identify gifted students in underserved populations	11/3/2015 11:34 AM
264	It seems that tests for Science and Social Studies my be over-testing students considering that many district don't serve these two areas.	11/3/2015 11:34 AM
265	I think that sometimes doing testing for Science and Social Studies can be a little unwieldy and possibly unnecessary since most districts do not service these areas (in fact they have a hard time servicing at all).	11/3/2015 11:30 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

266	My daughter was missed in with all the existing laws. Teachers are not aware or stop to think a kid is having trouble because they are gifted. Now I would like to see, SERVICES for the identified. They are SOOO BORED with repetitive curriculum and under challenging work or such overviews of important historical events, science etc they start to get depressed etc. This is not acceptable to waste minds so eager to learn and grow at a speed the other kids can't.	11/3/2015 11:23 AM
267	No, I am not an expert in this field. I would expect that Ohio's standards would be vetted by experts in this field and not those without such expertise. If this rule is supported by such experts then I am for it, if it is not then I am against it.	11/3/2015 10:49 AM
268	I support the old standards at a minimum or the use of the Ohio Gifted Association's proposed standards which can be found at http://www.oagc.com/files/DraftOAGCResponseto9.11.15ProposedRuleChanges.10.21.15.pdf .	11/3/2015 10:33 AM
269	Require annual whole-grade testing for cognitive ability, reading and mathematics achievement at least once in the K-2 grade band. Require annual whole-grade testing for cognitive ability, reading, math, science and social studies achievement at least once in the 3-5 grade band. Require small group or individual testing for cognitive ability and specific academic achievement within 30 days of a referral from: teacher, parent, school administrator, student, or community member who has regular contact with the student.	11/3/2015 10:26 AM
270	I think a definition of what superior cognitive ability would be important. A minimum group that must be served. I.e. Districts must serve the top 5% of students or if they score on a national test above the 98 percentile or something of this nature	11/3/2015 10:14 AM
271	Be sure to include some input from teachers who have worked with the kids and seen them in action	11/3/2015 10:04 AM
272	Identification is a first step, BUT we need more explicit requirements to SERVING gifted students.	11/3/2015 10:03 AM
273	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts	11/3/2015 9:12 AM
274	The specific language that was included in these rules previously has been removed. These are necessary to ensure that there are "teeth" to the rule and that the various parties who should be supporting gifted education are actually doing what they should be doing. In order to reduce the amount of testing on children, revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/3/2015 8:54 AM
275	This is way too vague. More detail is needed to guide and direct school districts in the ID process. The vagueness of the new proposal increases the potential for misinterpretation of the few rules that are left in the New Operating Standards... and greatly augments the potential for schools to take more advantage of the poorly defined NEW operating standards. School districts need detailed processes and guiding documents (as in the previous Operating Standards) to ensure equitable ID measures across the state. My local districts rely on the state manuals for their ID procedures, implementation guidelines, rubrics, standards, etc.	11/3/2015 8:24 AM
276	The service portion is WAY to WEAK! All children deserve the best teachers possible. Gifted students learn in different ways. Teachers without special certification often miss understand these students and just give more work at a higher level. Teachers need to understand how to teach with more depth! Please don't let this become law in Ohio! Our students deserve better.	11/3/2015 7:39 AM
277	Standardized tests cannot or do not test for gifted in areas such as art, music, business, ag, engineering and many more. Observations are assessments as much as tests are. Tests are nothing more than easy. When I taught, I could identify which students were struggling as well as those with different interests and those that excelled by observing during unstructured time.	11/3/2015 7:10 AM
278	Why are there only two "windows" of testing per year? What if a potentially gifted student moves in after the second window? Does that child have to wait until the first window the following school year to get tested? Are students for Special Education services only tested in two windows? Shouldn't all student potentially needing support services (SpED or Gifted) have the right to be referred and tested on an as-needed basis (as the kid needs it) rather than on an as-convenient-for-the-school basis? It's about the KIDS, right?	11/2/2015 11:17 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

279	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded which OAGC supports, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. 1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/2/2015 10:58 PM
280	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/2/2015 10:40 PM
281	Service for gifted students need to be spelled out. ONLY certified GIS should be teaching in gifted programs. The current language we have now is acceptable - with one exception ... gifted services should be mandated, just as all other special education services are.	11/2/2015 9:03 PM
282	Teacher recommendations and overall student performance are key in identifying gifted students. Testing is only one way to identify. My understanding is right now that this can happen at the parent's request at any time during the year. I see no reason to change this.	11/2/2015 8:56 PM
283	The specific language we have currently in the operating standards has been removed. Why? It is necessary! Districts should follow best practice. I am pleased that whole-grade testing is being expanded...much needed; however, the language needs to be improved. For K-2, limit the testing to superior cognitive ability, reading, and math. Reinstate the deleted elements from the ID section that are required in the Ohio Revised Code and in the current operating standards.	11/2/2015 8:54 PM
284	As a parent of a gifted learner and an advocate for others, I strongly urge the ODE to consider including the following changes: 1. Revise the whole grade testing from K-3 to K-12 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/2/2015 8:43 PM
285	no	11/2/2015 8:32 PM
286	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/2/2015 7:58 PM
287	Addition of parent notification process- an explanation of how/when parents or guardians should be notified of identification.	11/2/2015 7:55 PM
288	I think this is great that it now requires an alternative test for students with disabilities.	11/2/2015 7:55 PM
289	There is no language outlining the definition of what makes a child "gifted," which concerns me. This leaves those definitions up to individual districts, which means that students may be considered gifted in one district but not in others. As a result, some students may be denied services simply based on where they live, which is something over which students have no control.	11/2/2015 7:46 PM
290	Too many students are identified in early grades and the rules need to be more explicit in the early grades.	11/2/2015 7:34 PM
291	Not sure because I don't know what's been left out from the previous guidelines.	11/2/2015 7:11 PM
292	This seemed overly vague. It mentioned guidelines by DoE. Are there any included, or are those Tbd also?	11/2/2015 7:01 PM
293	Guidance is needed for the qualifications of personnel delivering services. And services must also be deemed appropriate for a students' areas of identification as recommended by best practice research in gifted education.	11/2/2015 5:59 PM
294	Please also look at qualitative factors as described by teachers and parents which make individuals fall into gifted needs.	11/2/2015 5:05 PM
295	Stay with current standards	11/2/2015 5:00 PM
296	Abolish the rule and abolish all state-run schools.	11/2/2015 4:07 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

297	My district changes the test scores needed for identification , raising the bar if there are more kids than they can accommodate. Situation ethics??	11/2/2015 4:05 PM
298	I'm glad that the identification begins at the Kindergarten level, this was not the case for when my kids were in that grade level.	11/2/2015 3:44 PM
299	Not sure how you can cut the standards down from 15 pages to 2 and expect quality education.	11/2/2015 3:30 PM
300	While I appreciate strengthening whole-grade testing for identification, the language needs to be expanded to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. I'd recommend revising the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards.	11/2/2015 3:11 PM
301	How this language plays out at the district and/or school level is hard for me to say, as a parent and observer. Sounds great, but is it?	11/2/2015 2:56 PM
302	It's not clear how the rule allows for the flexibility in the how to local districts but still maintains accountability for the fact that it is getting done to a proper standard.	11/2/2015 2:47 PM
303	Omitting specific general language out of the existing operating standards can be problematic as this specific language is necessary to ensure that districts follow best practices and meet the letter and spirit of ORC.	11/2/2015 2:31 PM
304	This appears to only allow the local organization to identify a child as gifted or not. If the particular district does not have someone who is educated in gifted education, I don't know that they are qualified to identify. This says nothing about testing from other, outside sources. Such as a psychologist who specializes in gifted children.	11/2/2015 2:18 PM
305	As long as the testing periods are not fixed (e.g., only at certain times of year, as with insurance enrollment), the twice a year standard seems okay. If testing periods are fixed, they may miss a student who transfers into a school before/after the test-in period. I'd also like this standard to recognize outside testing (psychologist, etc.) that identifies a child as gifted, outside in-school testing.	11/2/2015 2:13 PM
306	I don't know what screening opportunities mean.	11/2/2015 2:11 PM
307	Whole grade testing at grades 2 and 8/9 keep current ID and service definitions	11/2/2015 1:42 PM
308	Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 for clarity to schools	11/2/2015 1:40 PM
309	This rule section appears to establish the mechanism, i.e. testing schedule, for administering the "gifted" testing. However, I see no language as to guidance to support identification of gifted students - there is absolutely no "how to" within this rule.	11/2/2015 1:00 PM
310	Testing should continue to be available through the high school level. If for some reason a student has not been adequately assessed they should have the opportunity to test into the program. (I do appreciate the inclusion of IEP criteria. It will help students like my son (ASD) who could test into gifted programs but may not necessarily be able to complete a test without accomodation.)	11/2/2015 12:34 PM
311	Gifted students should receive education in accordance to their abilities all of the school day. There should be a director of gifted education at each school, with appropriately staff, so the kids do not have to be bounced from building to building.	11/2/2015 12:31 PM
312	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded which OAGC supports, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations.	11/2/2015 12:27 PM
313	Change the whole grade testing from K-3 to K-2 and limit tested areas to Superior Cognitive Ability, Math, and Reading.	11/2/2015 12:22 PM
314	The rules are way too vague. School districts are required to provide support for students requiring an IEP or 504 Plan. Funding is also provided to support these students. On the opposite end, it appears gifted students are provided less support and less funding. The rules require testing and some level of advanced programs. The gifted students have the opportunity to be the leaders of our country. Why not support them with the same level of opportunities and funding as the disadvantaged students.	11/2/2015 12:13 PM
315	I did not see that the gifted screening is performed at vocational schools?	11/2/2015 11:40 AM
316	If these rules are followed they sound great.	11/2/2015 11:24 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

317	I don't believe the wording is comprehensive enough; what I read is that there will be these one time opportunities for entire grades to be screened K-2, and 3-5; I didn't learn in this language how outside of those annual Gifted and Talented sweeps what other opportunities would exist; further I don't think you revealed how you would specifically search for and identify for under-served groups or even explicitly what was the criterion that would be used during the sweep? If State scores are going to be used as the benchmark we know there are a range of problems with this - A. some people get test anxiety and don't test well or they may be ill or didn't sleep; the point is a single criterion or a one day opportunity may shutter opportunities for a multitude of children; B. also again how would it qualify how it was going to expand its search for traditionally under-served populations such as the disabled, minority, female, English Language Learners, or those in homeless shelters - the District should have the same obligations to the Gifted as it does any other Special Education needs group. My point is there needs to be multiple opportunities throughout the year and multiple criteria; this proposal language was too narrow for me.	11/2/2015 10:45 AM
318	Superior cognitive testing for grade band K-2 with specific academic in reading and math only Superior cognitive testing for grade band 3-6 with specific academic in reading, math, science and social studies Superior cognitive testing for grade band 7-9	11/2/2015 10:40 AM
319	Simply stating "districts must provide at least two opportunities per year for gifted identification" does not address the problem of actually informing parents of these testing opportunities. Information is often buried within the district website, with little or no notification of when testing may be requested. Districts must be compelled to do more to reach out to parents with information regarding gifted testing/identification. Additionally, more guidance needs to be provided to districts on evaluating for gifted identification in students that may be bilingual and/or ADHD, but do not have an IEP, 504 plan, or ESL designation.	11/2/2015 10:30 AM
320	Would like more specifics on when to do whole grade testing etc.	11/2/2015 10:18 AM
321	no specifics on what the definition of "gifted" means -- lots of people think their children are gifted -- so put a recognizable standard in writing so that it's clear	11/2/2015 10:09 AM
322	(B)(1) All students shall treated as gifted and their individual gifts shall be encouraged and rewarded with enrichment consistent with their individual level of achievement. (2) Students identified as gifted in a particular area of study shall not be required to complete the standard level coursework in order to receive access to enrichment coursework.	11/2/2015 10:05 AM
323	I would argue that identification (Requirement 6a) should be conducted yearly at least one whole grade screening in grade band K-2, at least one whole grade screening in grade band 3-4, and at least one whole grade screening in grade band 5-6.	11/2/2015 9:57 AM
324	The idea of two whole grade screenings is a good one and well-supported by research. Districts will likely balk at this, but if the state is at all serious about identifying minority students and those who are economically disadvantaged this is the surest way to be successful. It would be better to have K-2 identification as well as 3 - 6 as early identification is really important in urban districts. There should be more specificity around the identification rules -- at least as specific as ORC.	11/2/2015 9:56 AM
325	You need people certified to support and define opportunities for gifted students.	11/2/2015 9:49 AM
326	I would like to see more opportunities for gifted education in math and science. Our school district does not currently offer this type of education for my child.	11/2/2015 9:45 AM
327	Testing 2 times a year would be more ideal than "at least one." Once they test gifted, then what? Are schools required to offer a gifted program in Elementary? They should be.	11/2/2015 9:40 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

328	<p>1. Revise the whole grade testing primary level band from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and that exist in the current operating standards. Rationale: Appropriate screening and identification of students who are gifted is an essential component of ORC and is the foundation upon which gifted services are built. It is poor public policy to remove large sections of current operating standards that serve as best practice for districts to follow, and it will ultimately hurt children. Some of the provisions removed will ensure that many gifted students will not be identified, fall through the cracks, or be subjected to inappropriate assessments. General statements that procedures need to be "comprehensive" are not adequately specific. OAGC supports the goal of comprehensiveness but believes this should be operationally defined in the standards to support clarity and equity. The Gifted Advisory Council recommended that several changes be made to the identification section in the current operating standards, including two whole grade levels of testing, including one during the early years, changes to 90 day referral language, and other language supporting parents and students. The 11.11.13 draft incorporated many of these provisions, which have now been removed from the 9.11.15 draft. OAGC strongly supports the inclusion of two whole grade levels of testing. In fact, compelling new research (Card & Giuliano, 2015) indicates whole grade screening will ensure more minority and economically disadvantaged students will be identified as gifted, as general education teachers typically under refer students from minority and economically disadvantaged subgroups yet these same students perform at gifted levels on whole grade screening instruments. OAGC recommends two changes based on data from the gifted performance indicator and best practice. Data show that gifted students are highly unlikely to be referred for screening in the early grade levels of K-2, which means they are unlikely to be identified and served. Early intervention for gifted learners has been shown to lead to long term success, and lack of early gifted services can lead to underachievement, disengagement from the educational process, and even higher dropout rates. This is especially bad news for at-risk students in urban districts. Conducting whole grade screening in an early grade maximizes opportunity for economically disadvantaged students to be identified in specific academic areas using achievement-focused assessments because state and national assessment data show that achievement gaps between disadvantaged and non-disadvantaged students are smallest in the early grades. Therefore, OAGC recommends that the primary level whole grade testing be moved from K-3 to K-2 to support earlier identification. OAGC also recommends that this initial testing be limited to superior cognitive ability and the specific academic areas of math and reading. Science and social studies are often intertwined with math and reading instruction at the primary grades. Limiting the whole grade testing requirement to superior cognitive ability, math, and reading strikes the balance between limiting the amount of required testing for our younger students while still ensuring there is an opportunity to identify high ability students from all demographic subgroups.</p> <p>2. Reinstate identification and service definitions as outlined in current operating standards 3301-51-15 and adjusted to some extent in the draft passed by the State Board of Education Achievement Committee on 11.11.13. Rationale: The 9.11.15 draft gifted operating standards removes basic definitions and general statements regarding gifted education that serve to clarify other areas of the document. ORC and OAC language typically provides a definition section and overarching general statements (in the case of OAC) to ensure that the document is interpreted correctly and that proper guidance is provided to districts. There is no reason to remove these sections from the operating standards, and the removal could cause confusion at the district level. For the sake of clarity, OAGC recommends that these sections be reinstated as outlined in the 11.11.13 draft.</p>	11/2/2015 9:36 AM
329	Provide more parent education about TAG and how to request testing for their own child.	11/2/2015 9:35 AM
330	Gifted students need to be serviced by licensed gifted teachers.	11/2/2015 9:27 AM
331	These are a start but they need to be more detailed. I also does not mention what qualifications a teacher needs to be able to provide gifted services. Also will a school psychologists or gifted coordinator be involved since giftedness is more complicated than doing exceptionally well on test.	11/2/2015 9:26 AM
332	Superior cognitive ability and specific academic areas of math and reading should be specifically mentioned in this identification and included in gifted programs. In addition, deleted elements from the identification section that are required in ORC and which exist in the current operating standards should be included. General identification and service definitions as outlined in current operating standards 3301-51-15 section A should be included to provide clarity to districts.	11/2/2015 8:51 AM
333	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts	11/2/2015 8:51 AM
334	That's about the most vague list of rules ever. It needs to be more specific.	11/2/2015 8:48 AM
335	The rule should specifically state what is considered services and how they should work.	11/2/2015 8:46 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

336	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded which I support, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. I recommend the following: Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/2/2015 8:42 AM
337	We need qualified teachers with a gifted certification to support our children. Our children deserve qualified teachers.	11/2/2015 8:27 AM
338	It is too broad. What differentiates gifted students is their neurologically atypical wiring. Without the explicit provision of a gifted specialist with gifted training and without the explicit provision of considerable time for these groups of students to work together, their needs are being ignored. These kids need social and emotional support that is distinct from other students. They also need to be challenged in ways that are more complex than traditionally understood "harder" or more advanced work. There also needs to be specific provisions that look out for the gifted children from poor and impoverished backgrounds as this is a documented problem in the current identification and services right now.	11/2/2015 8:18 AM
339	The gifted services should mirror the academic area the child tested gifted in. For example, in South Western City Schools, children who meet the guidelines for gifted services only receive those services in Language Arts in 3-6th grades. So, a child who is gifted in math, gets put into a gifted class for Language Arts which can be really frustrating for that child.	11/2/2015 8:14 AM
340	This is a ridiculous way to get input.	11/2/2015 8:06 AM
341	Districts are not identifying students in any other categories than academic. There should be a requirement to identify on the basis of artistic performance and creative thinking. Clear opportunities and guidance about how to identify on these areas are needed. Also, districts do not make available the alternative tests that can be used for identification.	11/2/2015 8:04 AM
342	Rather than in the areas of superior cognitive ability, math, reading, science and social studies, conduct yearly at least one whole grade screening in grade band K-3 I suggest: In the areas of superior cognitive ability, math, reading, science and social studies, conduct yearly at least each whole grade screening in grade band K-3 This provides additional opportunities for children to be identified in the younger years, since everyone has an "off day" occasionally (i.e. the test day).	11/2/2015 8:03 AM
343	Needs to address specific academic areas for identification	11/2/2015 8:00 AM
344	Gifted students need more classes on their levels. Honestly we need you to be teaching more hands on learning.	11/2/2015 7:23 AM
345	There should not be "Once identified always identified"! The students that have been identified this year and last were identified in 2nd grade in Math and are now in 3rd and 4th grades but are NOT testing in the 95% and ABOVE. Too many students are being identified as Gifted. MAP testing is what my school is using... And most kids are being identified in 2nd grade Math and then they are always identified no matter how their score goes down the following years. This is a problem!	11/2/2015 6:39 AM
346	This proposed rule really excludes students who are gifted in the arts.	11/2/2015 6:35 AM
347	I believe some tests, such as MAP, are identifying as gifted students who are not gifted. A one time score in the 95th percentile should not constitute identification as gifted.	11/1/2015 6:49 PM
348	I don't believe we should be identifying students as gifted at such young ages. We have had cases of students being identified as gifted in different areas, to later not score high enough to be considered gifted in later years. However, the state of Ohio says that once you are identified as gifted, you are always identified as gifted and that it can't be taken away. This is not how we treat other populations of students. If this is the case, then there needs to be a more strict process of identification in the younger grade levels so as to not misidentify students at such young ages, who later hurt a building's rating on state testing because they are not truly gifted.	11/1/2015 5:30 PM
349	Don't allow the students to be allowed to take the gifted test by request. I strongly disagree with that part. Other than that, the rules are pleasing.	11/1/2015 5:06 PM
350	As I am responsible for this and I don't know that much about gifted, I don't think I have enough direction from this language to do this properly.	11/1/2015 2:04 PM
351	Need to have more specific guidelines such as those included in the current standards. Glad to see whole grade testing, but how will this be enforced? ODE doesn't seem to care if districts follow the rules when it comes to gifted students.	11/1/2015 1:49 PM

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352	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	11/1/2015 12:03 PM
353	Why identify gifted students if then the majority will not be serviced with what they need because of lack of funding?	11/1/2015 10:24 AM
354	We have two big areas of concern with the new standards. The current standards require a certain minimum amount of gifted service per week and this disappears in the new standards. The current standards require gifted services to be taught by certified Gifted Intervention specialists and this disappears in the new standards. School Boards want flexibility, but in the field of gifted ed, flexibility ends up meaning less service for gifted students-especially in schools with financial issues. From what we can tell, the only accountability the schools have for gifted children under the new standards is an indicator on the state report card, but administrators who don't understand the complex needs of gifted children will likely think this need can be met by placing students in accelerated classes with teachers who have no training in working with gifted children. This can work with part of the gifted population, but not the part of the population who is most at risk. Gifted children who are most at risk usually just frustrate untrained teachers. We are all for innovative ways to meet the needs of gifted kids, but these standards are not the way to do it.	11/1/2015 10:14 AM
355	The test for identification needs to be more than one multiple choice screener!!!! The test given should be consistent across all districts and should not be a test such as MAPP where kids can guess. If MAPP is the screener to be used students should only qualify after multiple consistent scores to ensure data is consistent! Just as we would not identify a child with an IEP off a single test score we should not label a child gifted without multiple types and consistent data.	11/1/2015 7:35 AM
356	I do caution that some children are tested and retested, as certain parents pressure their children to "make the score/program," studying at home or in special programs to improve test scores, etc. I know this is up to the parent and out of teacher's control, but I feel for these students who fail again and again to make the score, and feel such pressure from home on these tests. I wish there were a limit to the number of tries that can be made in a time period; e.g. perhaps waiting two years between every two tests would help. Some parents sign up every time, hoping that their son/daughter will somehow do better.	11/1/2015 4:54 AM
357	Please set minimum contact hours for working with students that are identified gifted. All this rule does is state how to how identify students. There is nothing in there about servicing them. It is a skeleton with no spine!	10/31/2015 1:42 PM
358	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/31/2015 11:12 AM
359	I think that the rule should state a required band of testing (minimally once) for K-2 in Math and Reading and a second required band of testing in 3-6 for all content areas. My rationale is that if the first band is for grades K-3, everyone will test in 3rd grade. Most districts don't have services for primary students. Finding out they have gifted students in grades K,1 or 2 will push them to provide more support for these students earlier. We shouldn't take four full school years before capturing their ability. I think testing in Math and Reading only makes more sense than testing in M,R,Sc and SS (in the first band) because there aren't very many good instruments to test in science and ss for primary students, and the SC and SS curriculum doesn't even get close to being complex until later grades. In light of the request to reduce testing, it makes sense to just test for Math and Reading in K-2. The second requirement to test once between grades 3-6 makes sense as written.	10/30/2015 4:53 PM
360	Reinstate general identification and service definitions as outlined in the current operating standards 3301-51-15 section A to provide clarity to district. Revise the whole grade testing from K-3 to K-2 and limit testing to math and reading	10/30/2015 3:06 PM
361	REvise the whole grade testing from k-3 and K-2 and limit the testing to superior cog and specific academic subjects of math and reading reinstate general identification and service definitions outlined in current operating standards	10/30/2015 3:06 PM
362	Whole grade testing band should be K-2; limit testing to superior cog, math, reading Listing the current elements in the identification section to clarify ORC	10/30/2015 3:06 PM
363	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/30/2015 2:06 PM
364	Provisions for testing students above the 6th grade should be provided.	10/30/2015 1:39 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

365	The proposed rule does not dictate that districts follow standard testing procedures in the identification of gifted students, nor does it outline appropriate timelines to ensure that identification occurs in a swift and/or reasonable manner. I do agree that the proposal defines opportunities for gifted identification, but my concern is that the definitions for what constitutes identification for giftedness in various academic, cognitive, and artistic areas are not specifically stated. While these definitions are in the ORC, they also need to be in the rule so that there is no confusion as to what constitutes giftedness statewide. The standards should clearly outline the criteria. It is completely unreasonable to expect or require that administrators, teachers, parents, etc., refer back to the ORC for this critical information.	10/30/2015 11:27 AM
366	No	10/30/2015 11:23 AM
367	The reference to the ORC makes it difficult to go back and forth between the rule and the law. Put it all in the rule. The testing requirements are good to have two opportunities in the elementary grades. The should be K-2 and 3-5 and only in reading and math in the primary grades as well as superior cog.	10/30/2015 10:41 AM
368	Rather than referring to the ORC for reference, those part of the law should be included in the rule.	10/30/2015 10:30 AM
369	The new standards are to general and do not provide enough clarity for districts. Under-represented student populations may be missed. We believe the current requirements of 3301-51-15 are more precise.	10/30/2015 10:23 AM
370	I don't have a change to the rule. But I would like to add that not all schools are following this policy. My son was not identified as cognitively gifted until the 3rd grade even though I requested that he be retested at the end of 2nd grade after he told me he didn't finish the InView because it was "nice outside and he didn't know why he needed to take the test." His teacher refused my request to retest him and my son went an entire school year without receiving direct gifted services.	10/30/2015 9:22 AM
371	Yes, the opportunities for identification should be quarterly, not twice a year, particularly important for urban and transient families. In addition, using achievement scores to identify superior cognitive ability is inconsistent with appropriate and valid test use and shows ignorance on the part of the state of the concept of validity. Achievement test measures the past and superior cognitive ability is a predictor of the future and of potential. Sometimes they are related, but especially when children attend under-performing schools with little opportunity for enrichment and acceleration, this may not be true.	10/29/2015 7:56 PM
372	I am concerned about the requirement for yearly screening, especially considering the amount of testing students already participate in yearly. The time and cost of implementing this yearly testing seems impractical. I would prefer to see one or two screening years implemented between 2nd and 5th grade, with individual tested based on teacher and parent recommendation.	10/29/2015 7:01 PM
373	grad band to screen all says K-3 and 3-6 does that is unclear to me.	10/29/2015 3:16 PM
374	Whole grade testing has been expanded which is a positive. However, the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations.	10/29/2015 3:12 PM
375	The language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. Revise the whole grade testing from K-3 to K-2, limit the testing to superior cognitive, and specific academic areas of math and reading. Reinstate general ID and service definitions as outlined in current operating standards.	10/29/2015 11:55 AM
376	Please eliminate the required testing. Our students take so many state assessments already - plus these assessments would need to be taken by all boys and girls, not just gifted boys and girls. Please eliminate: In the areas of superior cognitive ability, math, reading, science and social studies, conduct yearly at least one whole grade screening in grade band K-3 and at least one whole grade screening in grade band 3-6;	10/29/2015 10:35 AM
377	Limit the testing in the early grade band to superior cognitive ability and specific academic areas of math and reading. Incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/29/2015 8:38 AM
378	Under-represented populations are at risk. More grade-level testing should be mandated.	10/28/2015 8:54 PM
379	Grade band overlaps in third grade K-3, 3-6. Make definitive so there is no overlap. What defines a student as gifted? There are no definitions to let districts know how this student is different from others. Identification section does not indicate the areas of possible identification. Does this mean I can put leadership back into the areas for my district? Nothing is indicated about the score for gifted? Is 95th percentile mentioned somewhere else, or can my district determine their own gifted identification score?	10/28/2015 3:27 PM

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380	<p>1. Revise the whole grade testing from K-3 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Rationale: The age of these students make it difficult for a quality scores to be collected in science and social studies until about 3rd/4th grade.</p> <p>2.Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.</p>	10/28/2015 3:23 PM
381	The current Operating Standards provide necessary details/guidelines/requirements for the identification of gifted students. Without those specifics we cannot be assured that districts will test and identify with fidelity.	10/28/2015 2:15 PM
382	Instead of offering a comparable test as stated in #5, allow alternate accommodations on state tests as could be prescribed in an IEP, just as district tests would be required to fulfill.	10/28/2015 2:05 PM
383	<p>1. Change the whole grade testing bank from K-2 and only require testing for superior cognitive ability, math and reading. Add back in the deleted elements from the ID section that are required in ORC and are in the current operating standards (2008).</p> <p>2. Add back in general ID and service definitions as outlined in the current operating standards (2008) section 3301-51-15 section A to provide clarification to districts.</p>	10/28/2015 12:44 PM
384	The rule is unclear. Additionally, there is too much testing.	10/28/2015 11:04 AM
385	<p>1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards.</p> <p>2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.</p>	10/28/2015 9:53 AM
386	Doesn't seem to have the capacity for parents to hold districts accountable for gifted services.	10/28/2015 8:10 AM
387	None	10/27/2015 10:54 PM
388	Yes, please keep all non aggregate data out of the data banks of the department of education. These standards for identification and the data collected, should be left to the states and their school districts, not to the DOE.	10/27/2015 8:15 PM
389	<p>Option 1: Reduce required annual testing opportunities from 2 to 1 to preserve instructional time. Multiple days of instruction are lost due to high numbers of students testing on 2 separate occasions during non-blanket testing years.</p> <p>Option 2: Allow schools to only assess outside school hours (Saturday, evenings, etc...) for non-blanket testing to preserve instructional time.</p>	10/27/2015 7:41 PM
390	No. I think that it is important that also ESL students have an opportunity to be identified as gifted. When we tried testing our son, he did not pass the cognitive test - he was two points short - because of his limited English. He said that he did not understand the questions. Unfortunately, it was after we came back from a more than two months stay in Europe, where he had not been exposed to any English. Later, in spring, when his English became very good again, I forgot to ask for testing, so he had to wait till next year. Pity.	10/27/2015 6:53 PM
391	This has the Revised Code, but doesn't outline the specific areas.	10/27/2015 3:52 PM
392	There does not seem to be any specific area of giftedness that this rule suggests should be identified.	10/27/2015 3:52 PM
393	YES, The MAP testing that is on the approved list show be investigated. I have talked to many others and they also think there is a discrepancy in the scores that are being generated from MAP. If your school district is using MAP to identify students then the average of the baseline, winter, & spring scores should be averaged together to get a true percentage score for that student and then that score be the one used to identify. I believe there are false scores coming from the k-2 MAP. I have seen in our district too many student qualify in the early grades and then can reach that percentage again or achieve that scores once in a year and never come close again. IF they are truely gifted then that student should be able to stay in the 90% range at all times.	10/27/2015 3:32 PM
394	Operating standards need to provide clarity to districts. This is lacking in this draft.	10/27/2015 3:22 PM
395	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/27/2015 2:50 PM
396	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/27/2015 2:50 PM

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397	It is important to include the definitions for identification as provided in the current Gifted Operating Standards. Testing bands should be changed to K-2 and 3-6 to avoid any overlap as it is stated in the proposed draft (K-3 and 3-6). K-2 should only be required to test superior cognitive ability and specific academic areas of reading and math.	10/27/2015 1:36 PM
398	Revise whole grade testing to make first testing K-2 in order to identify students at a young enough age to make sure they are challenged at an appropriate level. The standards should include deleted elements from the identification section that are required in ORC and which exist in current operating standards. Include the general identification and service definitions as outlined in current operating standards 3301-51-15 to provide clarity to districts.	10/27/2015 1:25 PM
399	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/27/2015 11:27 AM
400	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/27/2015 10:52 AM
401	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/27/2015 10:41 AM
402	OAGC concerns: The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded which OAGC supports, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. OAGC recommends the following: Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/27/2015 10:37 AM
403	There could be more detail added in some areas.	10/27/2015 10:29 AM
404	I'm not clear if this was stated in the wording by my son received a perfect score on a state approved identification test in the area of social studies in second grade. Our district states they do not recognize social studies identification scores in the second grade because they are inaccurate. My next question to my district would be then why are you using an inaccurate test. Secondly once identified, always identified is the rule in Ohio.. Why are districts not following this?	10/27/2015 10:12 AM
405	No	10/27/2015 8:33 AM
406	We are concerned about the funding that would be necessary for the required whole grade assessment.	10/26/2015 10:06 PM
407	I don't believe the rule offers support by means of incentive for schools to bother with implementing the identification of gifted students. This rule assumes that districts are in agreement that gifted students (at any grade, level or ability) exist in their schools and that they want to comply with screening/ identification for the good of the student. This rule fails to mention screening for gifted in visual and performing arts in addition to superior cognitive, ELA, math, science and social studies areas. I'd like to see all of the screened areas listed for K-12 students.	10/26/2015 7:18 PM
408	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/26/2015 5:14 PM
409	Increase funds for identification and increased district accountability for district i.d. funds. With the state report card gifted indicator in mind, it's imperative to clearly define gifted identification and service as in ORC 3301-51-15. I respectfully urge you not generalize or water down the current law. The proposed plan will be detrimental for gifted students.	10/26/2015 2:42 PM
410	Districts should not have the right to determine who is qualified to teach gifted students. There is a body of knowledge regarding the nature and needs of gifted children. Since there is no undergraduate or graduate requirement for this subgroup, it is a travesty for untrained people to determine which untrained people would best meet their needs.	10/26/2015 2:31 PM

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411	The testing should be whole grade testing in K-2 for superior cognitive ability and specific academic areas of math and reading. Keep the second band of testing for additional opportunities to keep from missing anyone.	10/26/2015 2:10 PM
412	I have concerns about offering screening opportunities for Superior Cognitive in the grade band per year.	10/26/2015 2:01 PM
413	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/26/2015 1:17 PM
414	Students with English as Second Language are mentioned, but there is no specifics about how to best screen ESL students.	10/26/2015 12:53 PM
415	Whole grade testing back to K-2, only test for Sup. Cog., reading, and math. Replace the elements that have been deleted...	10/26/2015 12:25 PM
416	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts. The wording used in the proposed operating standards is general enough to allow for a wide range of interpretations that may easily stray from the intention and letter of the law.	10/26/2015 12:22 PM
417	Revise the whole grade testing from K-3 to k-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/26/2015 11:44 AM
418	Language is too vague and does not details specifics as well as current language. Testing for specific content beyond reading and math during the band K-2 seems unnecessary.	10/26/2015 11:22 AM
419	The grade bands listed overlap. It should be K-2 and then 3-6. A suggestion would be to limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading.	10/26/2015 11:13 AM
420	No	10/26/2015 10:46 AM
421	no	10/26/2015 10:45 AM
422	I think districts must be required to use more than one criteria to identify a student as gifted. For example, if a student shows gifted ability on one measure, they must also show gifted ability on a different measure in order to be labeled as gifted.	10/26/2015 10:31 AM
423	I am concerned about district with gifted funding being cut where is the money coming from for assessments.	10/26/2015 9:56 AM
424	I believe the described methods will have a difficult time identifying creativity--and I mean the ability to synthesize original ideas. It's difficult to know that without taking the tests themselves. But in engineering, any scientific pursuit involving discovery, and of course in fields wherein creativity is commonly identified, such as in writing, composition of music, etc--that standardized tests have a difficult time identifying the gifted.	10/26/2015 9:46 AM
425	The whole grade testing needs to be changed from K-3 to K-2 and limit the testing in the initial grade band to SCOG and Specific academic areas of math and reading. In the identification section, the deleted items that are required in ORC and that are in the current operating standards needs to be put back in to the new standards. Districts need clarity of the general identification and service definitions like they are outlined in the current operating standards 3301-51-15 section A	10/26/2015 9:43 AM
426	There are no standards for what constitutes a gifted student. In the past, the state standards have been too high.	10/26/2015 9:38 AM
427	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/26/2015 9:28 AM
428	The testing apparatus for ESL students is not clear. Are we allowing different tests to accommodate?	10/26/2015 9:27 AM
429	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/26/2015 9:22 AM

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430	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/26/2015 9:21 AM
431	I am concerned that we are testing and testing these kids way too much.	10/26/2015 8:33 AM
432	I would like to see the law be more specific to the identification of gifted children. It is very frustrating when moving between districts to get a common application of gifted identification. There should be multiple funded opportunities to identify and serve gifted children.	10/25/2015 11:09 PM
433	The language is confusing. It looks like students can be assessed one time K-3 and then 3-6. If they school waits until grade 3, do they then not have to assess that same population since grade 3 overlaps? Do students need to be reassessed every 24 months in order to re-qualify?	10/25/2015 10:01 PM
434	In order to get an accurate picture of a gifted student you need several test results and I feel overall performance in the classroom is important as well.	10/25/2015 9:20 PM
435	This is not specific enough to make me feel assured that my child will receive the appropriate services and support.	10/25/2015 8:01 PM
436	Comprehensive, consistent and inclusive need to be more exactly defined. All three can be a matter of interpretation, and some schools will have a more liberal interpretation.	10/25/2015 6:38 PM
437	no	10/25/2015 2:27 PM
438	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/25/2015 12:33 PM
439	The proposed rule(s) for identification appear sound. It's the lack of accountability the schools have for doing it in a way that meets the needs of our gifted and twice exceptional students. We are in Olentangy and we have processes for identification, but as a parent and a clinical professional specializing in gifted services, I've seen and heard from many parents whose children have been missed under the process. Especially those who are twice exceptional (fall on both sides of the bell curve and may have other issues such as executive functioning, ADHD, dyslexia, learning disability, anxiety and require an IEP).	10/25/2015 11:43 AM
440	N/A	10/24/2015 9:21 PM
441	Provide whole grade screening in grades K-3 to be limited to superior cognitive, creativity, reading, and math.	10/24/2015 5:06 PM
442	Input from the classroom teacher should be included as a deciding factor.	10/24/2015 3:00 PM
443	Not clear on whether identified gifted students must be accommodated. Lots in here about identification, but not much about serving them.	10/24/2015 2:20 PM
444	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/24/2015 1:05 PM
445	I do not agree with the idea that if a students is labeled as gifted they are always gifted. That would be the same as saying if a students is labeled special needs they are always special needs.	10/24/2015 12:13 PM
446	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded which OAGC supports, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations.	10/24/2015 12:07 PM
447	Screenings twice a year could be cost prohibitive and time consuming, especially given the other mandates concerning standardized testing.	10/24/2015 11:14 AM
448	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/24/2015 9:55 AM
449	no	10/23/2015 11:47 PM

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450	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to Superior Cognitive ability and specific academic areas of Math and Reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/23/2015 5:29 PM
451	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations.	10/23/2015 5:11 PM
452	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/23/2015 5:03 PM
453	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to SUPERIOR COGNITIVE ability and specific academic areas of MATH and READING. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/23/2015 4:53 PM
454	You need to allow for those students gifted in areas like music and art as well as academics!	10/23/2015 4:51 PM
455	Where is the comparison of the proposed rule to the previous rule? Not enough information to answer in an educated manner.	10/23/2015 3:00 PM
456	reinstate general identification and service definitiuons as outlined in current operaitng standards to provide clarity to districts	10/23/2015 2:51 PM
457	There are not enough specifics as to which tests can be used, such as "nationally normed". Sending people to ORC 3324 to find approved criteria, etc. will only add more work time used to look it up, when a few sentences in the rule itself would make it clear. The object of the rule should be clarity and ease with which to build a gifted service program. This is much too general. Keep the current operating standards identification service definitions	10/23/2015 2:15 PM
458	I believe that anyone servicing gifted children should have a gifted certification. I would also like to see the special education population of gifted students be supported both academically and financially as much as the typically viewed special education population.	10/23/2015 2:14 PM
459	Will the gifted children be in a self-contained setting? The educational opportunities are vague.	10/23/2015 2:08 PM
460	There doesn't seem to be any specific parameters or benchmarks by which a district would identify a student as gifted - what score or how many standard deviations are required? Where did that info go?	10/23/2015 1:43 PM
461	Can they really be identified 2 times per year, each year of their education? I think the test should have a certain number of times stated that they can take it.	10/23/2015 1:28 PM
462	Many parents and often teachers do not know they have gifted children, especially if they are 2E or have behavioral problems due to the fact they are not challenged and feel out of place. Ohio State should provide a guide on signs telling a student is gifted, including the not so nice traits resulting form feeling different or not challenged. This rule does not solve the problem of identifying 2E children. Yes there is a provision to allow different gifted test if student has 504/IEP accommodations that do not match the gifted test usually utilized, and this is a progress, but very often 2E students do not have a 504 or an IEP because their IQ covers the LD especially from K-6 grade and the LD cover the IQ. State will still miss the identification of many 2E students with this rule as written now. And by the time the student is in 6th grade or higher he/she has accumulated so much frustration that can lead to drop out in later years, without counting the fact that the student missed 7 years of possible gifted and LD instruction when it was more needed. As far as defined opportunities, it does not ask the district to advertise the test dates at the beginning of the year and so parents unaware may miss the tests dates. Gifted testing dates should be on the district and school calendar at the beginning of the school year to allow everyone to plan accordingly.	10/23/2015 12:21 PM
463	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/23/2015 10:59 AM

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464	As a teacher of gifted students and an educational researcher with a doctorate (as well as a parent of 2 identified gifted students), I am frustrated that the definition of "gifted" is limited. Only a small portion of gifted children are identified by our current standards of testing. We are ignoring some truly gifted thinkers, problem solvers, and artists. Gifted education in Ohio (as well as the rest of the United States) should reach beyond accelerating students in traditional school subjects. Students who excel in the aforementioned traits are being neglected by the current system. My own children are not receiving the education that I would expect in gifted programs. Accelerated and gifted do not share a definition.	10/23/2015 10:32 AM
465	Encouragement to districts to rescreen students beyond grade 3. Some only rely on test scores from those years and children change an enormous amount from grades 3-5. Many more identifications occur in academic areas compared to identification undertaken at grades 2 or 3 or younger.	10/23/2015 10:31 AM
466	It should reference those tests specifically authorized for identification outside of the tests given by Ohio schools. If not listed, it should reference a link to ODE website that maintains all methods authorized for the identification of gifted children.	10/23/2015 10:30 AM
467	It seems that social studies identification is redundant to reading and writing giftedness. In what other way(s) can a student demonstrate giftedness in social studies, except through a superior memory, intuition, etc., which would seem to overlap the general cognitive identification.	10/23/2015 9:50 AM
468	The survey fails to ask the real question of whether the district is expending funding appropriately on gifted students as required by ORC.	10/23/2015 8:08 AM
469	the protective need to identified by individual families supportive decision making process that really understands abuse and neglect for opportunities of compassion	10/23/2015 7:58 AM
470	The proposed rule does not include identification of students who have transferred into the state in which were eligible/identified to receive gifted services in another state.	10/23/2015 6:51 AM
471	With so much time spent on standardized testing, I do not think it is necessary to conduct two whole grade-level screenings. Many districts already use diagnostic tests that are approved to identify for giftedness, for instance NWEA's MAP tests. I do think one grade-level screening in the K-3 band is appropriate and then any other cognitive testing may be done by requests from parent or teachers.	10/23/2015 5:27 AM
472	The rule needs to list what constitutes a gifted identification in each area. What does a student need to score in order to be identified as gifted in Superior Cognitive, reading, math, science and social studies? The rule also needs to add the opportunity to be identified as gifted in the Arts and in Creative Thinking and it needs to define what needs to be achieved in order to be identified as gifted in those fields.	10/22/2015 11:54 PM
473	Specific tests and district accommodations should be made available for those children identified as gifted in only one academic subject area.	10/22/2015 10:38 PM
474	More gifted services for mathematics in the intermediate setting.	10/22/2015 9:45 PM
475	Need to revert back to the old old ruling where students were identified as gifted by IQ AND content specific	10/22/2015 9:21 PM
476	What content areas need to be tested for identification?	10/22/2015 7:37 PM
477	The support and language needs to be improved to better testing in early grades in a more productive manner. We need to better support the identification of under-represented student populations such as gifted. These modifications are turning our education system to a non-distinct focus and severely leaving advanced/gifted kids underserved. We as parents need to be able to have resources in our schools to help us guide our children.	10/22/2015 7:03 PM
478	Reinstate general identification and service definitions as outlined in current operating standards section A to provide clarity to districts.	10/22/2015 5:53 PM
479	Spell out the criteria: for example, scoring at the 95th percentile rank on a nationally normed test.	10/22/2015 5:43 PM
480	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/22/2015 4:47 PM
481	Would need a lot more information to answer the above questions. How does the proposed rule differ from the current rule? What tests are approved? Do parents find out ahead of time when the tests are being administered?	10/22/2015 4:12 PM

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482	Providing two opportunities for K-12 identification throughout the year due to parent, teacher or student referral is too much as other whole grade level assessments for identification already take place. One window for referrals would be appropriate. It seems like more and more assessment is being added to districts and it's not inexpensive for these assessments to take place both pertaining to money and time. With the whole grade screening, it should only pertain to ELA, Math and Sup Cog. Adding the requirement of science and social studies will be extremely expensive and more time intensive. Again, another example of more assessments for kids and no financial support given to districts to carry it out in regards to the assessments themselves and to provide high quality services to students. No need to identify in science/social studies if districts are not serving.	10/22/2015 3:53 PM
483	Ode will provide resources and funding outside of any current fund to identify and serve all gifted students.	10/22/2015 3:29 PM
484	Best practice would include requirements for additional whole-grade testing	10/22/2015 3:29 PM
485	Yes, how about mandating not only identification but also service to these children. My daughter has been identified superior cognitively gifted since Kindergarten but has not been serviced adequately. Actually, not at all. Especially since moving into her current building for 3-4th grade. I do not understand the point of identifying when the schools are not mandated to service these exceptional children.	10/22/2015 3:12 PM
486	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/22/2015 3:08 PM
487	A formally notice should be sent to parents that they can request testing at any year.	10/22/2015 3:06 PM
488	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded which is encouraging, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. Suggestions: 1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/22/2015 2:46 PM
489	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded which OAGC supports, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations.	10/22/2015 2:23 PM
490	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded which OAGC supports, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. Recommend the following: Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/22/2015 2:17 PM
491	State the identification definitions and criteria as they currently exist in Section A of the 2008 Operating Standards, in order for them to be and accessible to parents and school personnel. Revise the grade bands for whole grade testing to K-2 and 3-6. The primary grades should be tested for Superior Cognitive, Creative Thinking, Reading and Math. The intermediate grades should be tested in all of the above plus Science and S. Studies. Additional whole grade screening at one or more grades should also be included for Music and Art.	10/22/2015 2:00 PM
492	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/22/2015 1:52 PM
493	Yes - reinstate the general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts. The sheer vagueness of the proposed rule will not guarantee appropriate actions by districts. Sadly, gifted education is an area that is not as a rule given priority (especially in times of tight budgets), and many districts simply do not understand, or make the effort to understand, the nature of the gifted and their special needs. BE SPECIFIC.	10/22/2015 1:38 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

494	Old language that has been removed needs put back into it.	10/22/2015 1:34 PM
495	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded which OAGC supports, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. Changes: -Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. -Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts	10/22/2015 1:23 PM
496	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded which OAGC supports, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. A recommendation would be: Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/22/2015 1:11 PM
497	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/22/2015 1:08 PM
498	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/22/2015 1:04 PM
499	I would like to see grade level groups be split differently, which would allow for earlier identification; instead of a K-3 testing opportunity, perhaps K-1 and 2-3.	10/22/2015 12:41 PM
500	Remove the grade band requirement Remove the requirement for Social Studies and Science	10/22/2015 12:39 PM
501	Identification should be K-2 so that gifted are identified earlier and their needs can be met.	10/22/2015 12:14 PM
502	Testing should be done K-2. Guidelines should be defined.	10/22/2015 12:13 PM
503	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. Suggestions: *Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. *Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/22/2015 12:06 PM
504	I would suggest requiring that one of the whole grade screenings occur in grade K, 1, or 2 to maximize opportunities for economically disadvantaged students to be identified, as the achievement gap between disadvantaged and non-disadvantaged students is narrowest at the early grades.	10/22/2015 12:05 PM
505	None	10/22/2015 12:04 PM
506	No, it is clear what the standard/expectation is. I would say schools should supply the testing numbers and scores to ODE each year. There should be a mechanism to insure that under-resourced schools are offering children in poverty the same opportunities that children in high wealth districts have. If you look at high wealth districts and districts of poverty you will see a significant disparity in identification. Does that mean there are not gifted students in Appalachia or inner-cities? Many parents in low-socioeconomic areas aren't aware of what services and opportunities should be afforded to their children- so they don't 'push' for testing. Providing education and outreach in those communities in particular would be helpful. For example, there are schools such as Federal Hocking that do not test gifted students and haven't for years. There was a number of years were not offering it by saying they are 'differentiating' for all students. When parents ask they aren't able to answer what the procedure is and numerous parents have expressed dissatisfaction. The superintendent at that school is known in the community for saying the state keeps dropping our funding and we can't keep up with everything without the money.	10/22/2015 11:58 AM

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507	The language needs to have more specificity regarding what grades bands will be screened and tested - preferably K - 2 for superior cognitive ability, and grades 2 and up for specific academic prowess. Districts will do what is required as they do now with the current standards.	10/22/2015 11:45 AM
508	Retain current identification definitions as outlined in current operating standards, Section A, to provide clarity to parents and educators. Revise the whole grade testing bands to K-2 and 3-6; K-2 should include Superior Cognitive Ability, Creative Thinking, Reading and Math.	10/22/2015 11:43 AM
509	Include language that encourages improved assessment for early grades to support the identification of underrepresented populations. -revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas that are required in ORC and which exist in the current operating standards. -reinstate general identification and service definitions as outlined in current operating standards to provide clarity to districts	10/22/2015 11:37 AM
510	The proposed testing in grades k-3 seems excessive, considering all of the other required testing of students.	10/22/2015 11:14 AM
511	Our current whole grade testing in second grade serves our small district goals more effectively. Administering a whole grade assessment for 3-6 would not benefit our current program.	10/22/2015 10:49 AM
512	No	10/22/2015 10:36 AM
513	I may have missed it being mentioned, but I would prefer a system that had some teacher input as well, so that IQ tests weren't the only indicator. Some gifted students will be missed using only test, especially minorities which are sometimes affected by testing bias.	10/22/2015 10:35 AM
514	The time frame may be in question if a parent requests testing (new to the district) and the 90 day falls outside the time the next scheduled test. That may need clarified.	10/22/2015 10:28 AM
515	From the standpoint of mathematics, most of the tests that we use to identify giftedness are not especially telling or even valid. Mathematical thinking is a complex set of habits of mind that cannot be easily measured by any one standardized test. Districts should be required to rely on at least one assessment that reveals students' thinking, not just the answers to questions or problems. For instance, Cognition Based Assessment (Battista) would be one such assessment system -- there are not many like this available at this time.	10/22/2015 10:12 AM
516	Money provided to the districts to take on the additional testing.	10/22/2015 10:02 AM
517	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in the current operating standards 3301-51-15 section A to provide clarity to districts.	10/22/2015 9:47 AM
518	The language in the current operating standards is much clearer. Requiring whole grade screening is excellent, however, K-3 should be K-2 with the requirement being superior cognitive ability and specific academic areas of math and reading. Also, the incorporation of the deleted elements from the identification section that are required in the ORC and that exist in the current operating standards is a must.	10/22/2015 9:19 AM
519	The language is too broad and there is nothing to ensure the law is being followed.	10/22/2015 9:14 AM
520	The rule indicates that the district will offer ID twice a school year for K-12. Based on what I currently know about doing that testing, it is expensive for the districts and that may be difficult to fund. Will ODE consider supporting the districts who cannot afford that testing?	10/22/2015 9:02 AM
521	Identifying individuals in grades K-2 does not give accurate results. If the child comes from a home where there is a great deal of interaction and instruction provided by the parents and or goes to a great preschool, the child is going to score significantly well. I can give you a recent example of what I mean. We have a psychologist who worked with his daughter on reading and math from the time she was two. She came to school and could read better than all of the other children and was equally adept at math. She scored grade levels above all of the other children. By the time she was in third grade, a couple other students were passing her. In fact, he had her tutored in math, by a teacher, to enable her to remain one of the top individuals in math in her class. Identified in the primary grades as gifted, the individual remains as identified according to the rules. This individual is not truly gifted and if tested in grade 3 or later would not meet the criteria. I think that such an individual should be provided some services, but not be identified as gifted. A few years ago, we had a coordinator who identified many students at the primary level. We have about 100 students per grade level. At that time the individual often identified 10 to 15 students per grade. Sorry, we are a small town. It would be great if we had 10% to 15% of our students gifted, but it just isn't so. We are living with the consequences. This isn't a recent observation. This is a conclusion developed over the 30+ years ago that I have had gifted certification.	10/22/2015 9:00 AM
522	Names of specific test should be included.	10/22/2015 8:44 AM

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523	<p>Revise whole grade testing from K-3 to K-2 and limit testing in this band to Superior Cognitive, Reading and Math. Incorporate deleted elements from identification section required in ORC which exist i the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A which will provide clarity to districts.</p>	10/22/2015 8:20 AM
524	<p>#4 I disagree with. I have seen too many discrepancies with MAP K-8 scores and have discussed with many educators across the state and they have also seen the same happening in the schools where they work. I think this issue needs to be investigated or change it to an average of the three percentages (baseline, winter, spring) together to get the final percentage and then qualify from that score.</p>	10/22/2015 7:12 AM
525	<p>1. Regarding assessment for gifted identification and the proposed mandate for whole grade testing, leave the current rule as is with NO MANDATE for whole grade testing OR provide options for districts to make the BEST DECISIONS LOCALLY based upon best practice, students/student needs and services. Mandating assessment in all areas over multiple years is not best practice, nor does it support or align varying districts' student services and needs. 2. Reinstate the general identification and service definitions found in the current operating standards 3301-51-15</p>	10/22/2015 6:24 AM
526	<p>The proposed rule does not sufficiently address the identification of twice exceptional students. The rule needs to be strengthened with regard to testing potentially twice exceptional students, especially students with any type of disorder, which may not be classified as a disability. For example, dyslexia is often masked due to giftedness, therefore the dyslexic gifted student cannot qualify as having a "disability" and cannot receive appropriate gifted testing (most tests are reading-based). I am an Ohio educator. I am also the parent of three gifted children with learning disorders. They are all honors students. One of my gifted children has dyslexia. This child was identified by Cincinnati Children's Hospital (we took her there due to reading and spelling frustrations which were not being addressed by the school) as having an unspecified reading disorder. However, the elementary school refused to grant special help with spelling or gifted testing accommodations, and my child was left out of all gifted programs, including a gifted math program for which she qualified through testing. [REDACTED]</p> <p>[REDACTED] She is gifted, and she has succeeded academically despite her Ohio elementary school experiences. Another of my children has ADHD, and the 3rd has both dyslexia and ADHD. We did not have the other two children formally tested and identified, as it served no purpose. The local elementary school would not have recognized their learning issues as a disability due to their adequate (passing) academic performances. Formal testing for ADHD and dyslexia would not have generated special services nor accommodations for gifted testing. Instead, we transferred these [REDACTED] [REDACTED] they qualified for the gifted program. When they transferred back to the local school two years later, they qualified for the local junior school gifted program.</p>	10/21/2015 10:44 PM
527	<p>List the acceptable tests that would qualify a student as gifted. This way no one would wonder if a test is acceptable or not.</p>	10/21/2015 10:34 PM
528	<p>As part of an urban district, there is concern that the testing and records of a transient population fall through the cracks. (I believe Columbus City Schools had about 10,000 "new to the district" students, not to mention the huge number of students who move from one building to another) So, basically, unless such a district tests the students (grades (2-7) though group testing every year, many fall through the cracks for several reasons: - Many parents do not know the process and assume the GT identification is being taken care of and do not know enough to follow through. - If district A tests in grades 2 and district B tests in grades 3. Then, student in B moves before testing to school A in the summer before 3rd grade, that student misses testing. - Additionally, there is a big problem with the loss of the individuals records in regard to GT. Some districts do not send "gifted identified" data with the student records ever. In other cases, the receiving building does not check the records in search of gifted identification. Even if there is a testing report sheet in the folder, the receiving person does not know what to look for. Possibly, within the state of Ohio, there could be a data base so that when a student arrives in a building, the receiving school can check the statewide data base, and go from there.</p>	10/21/2015 10:15 PM
529	<p>I am told "Gifted Students" are tested in 4th grade and then are labeled that until they graduate. This is not right, just because they are labeled in 4th grade does not mean they are in the 12th grade.</p>	10/21/2015 10:09 PM
530	<p>I have concerns about offering an alternative assessment for students with a disability. In my circumstances, parents will want a cognitive assessment that allows for extended time. This may lead to a significant increase in requests for individualized IQ tests. With one school psychologist for grade K-5, we would not be able to meet this need. Possibly, a better understanding would help me to interpret it differently.</p>	10/21/2015 9:41 PM
531	<p>use other methods to identify giftedness, instead of standardize testing</p>	10/21/2015 9:35 PM
532	<p>I do not have any specific changes at this time.</p>	10/21/2015 9:20 PM
533	<p>I believe our state should be required to service gifted students and the funding needs to be available to be able to support gifted services.</p>	10/21/2015 8:56 PM
534	<p>Identify what measure will be used to arrive at gifted status.</p>	10/21/2015 8:54 PM

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535	The identification rule seems to be a bit vague. For instance, what is considered "comprehensive, consistent and inclusive?"	10/21/2015 8:49 PM
536	Once gifted not always gifted... Work Ethic is a major part - those that test gifted and don't want to do the work. Those that don't test well, but would do the work and excel.	10/21/2015 8:43 PM
537	Too many assessments. More testing does not equate to more gifted learners	10/21/2015 8:04 PM
538	no	10/21/2015 7:21 PM
539	I believe the rule needs to have more structure for identification procedures including a need to recognize that many students of remarkable intelligence, creativity and academic ability are not identified with traditional standardized testing. Alternate paths to gifted identification such as portfolio and teacher evaluations should be considered as an option for identification in subject areas or superior cognitive.	10/21/2015 7:13 PM
540	There is no mention of artistic or creative abilities. No mention of visual or performing arts. One can be gifted in other areas of life besides math, and science.	10/21/2015 7:12 PM
541	No	10/21/2015 6:54 PM
542	Don't believe students should be tested more than 1 time per school year. If the student does not obtain a qualifying score, they should have wait until the following school year to retest.	10/21/2015 6:26 PM
543	No need to test for Social Studies and Science in the k-3 grade band	10/21/2015 6:20 PM
544	Is the state going to pay for the testing? How do professionals give input into the classification of gifted?	10/21/2015 6:16 PM
545	Seems way too vague.	10/21/2015 6:14 PM
546	Flexibility for twice exceptional Id.	10/21/2015 6:05 PM
547	Identification should be based on content area, IQ, or motivational levels. Because some students are gifted in one content area, but not at a gifted IQ level, they need to have a way to get services for that content area. Music and art giftedness also need to be protected. Otherwise, many students fall through the cracks and are not provided with services that guarantee they will be challenged to their full potential. For example, a fifth grade student at an 11th grade reading level/9th grade overall ELA skills level, but does not have an overall IQ of 140 should not be denied services in ELA.	10/21/2015 5:40 PM
548	Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/21/2015 5:38 PM
549	Include ways to write a WEP for students attending private schools.	10/21/2015 5:28 PM
550	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/21/2015 5:19 PM
551	I believe that all scholars should be screened twice a year	10/21/2015 5:15 PM
552	For the district-wide testing, spell out TESTING (not just the word "screening") as districts need non-negotiable terms that cannot be defined any way but "use a nationally standardized test on all students in a given grade level" or something specific to that effect.	10/21/2015 5:08 PM
553	The general identifications and service definitions found in the current standards provide clarity to districts and gifted staff on how gifted operations should be running. Please reinstate these guidelines to help guide districts and gifted staff	10/21/2015 4:50 PM
554	Study helps like dictionaries, a thesaurus, and possible interpreters may be needed as well as additional time allotment for each student.	10/21/2015 4:39 PM
555	Not all students do well on tests - and this includes gifted students. Students need learning opportunities during which they can engage in child led learning projects. These types of projects can adequately identify gifted students that standardized testing missed.	10/21/2015 4:37 PM
556	More than one test score should be used and when identified, all gifted students should be clustered with one teacher who either has gifted certification or has been given training by their district in gifted education.	10/21/2015 4:24 PM

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557	Clarity is here, but support is a problem. 1. The list of approved measures is extremely limited for science and social studies and forces districts to select from a limited number of published test batteries that are extremely expensive, especially if we don't have another use for the scores. If ODE is approving these batteries, then can they negotiate with the test publishers to permit Ohio districts to get a price break if all they really want is science & social studies? 2. Given the commonly held assumption that once gifted, always gifted doesn't seem to have support either in these operating standards OR the ORC, perhaps it should be clear that to be gifted in a category, a student must have results from within the past 24 months to confirm that the child's level of functioning is within the gifted range.	10/21/2015 4:10 PM
558	There are other ways to identify "giftedness" than by standardized tests. There are other factors that could be considered, such as student work and performances. If you are only speaking of high IQ as measured solely by a standardized tests, than these students would be identified. Others will not.	10/21/2015 3:54 PM
559	The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded which OAGC supports, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. recommendations: Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/21/2015 3:41 PM
560	There are times when a parent refers their child and the child is in the bottom quartile for performance in that content area. The way the rules states, it doesn't sound like the district has a choice in whether or not to screen the child. We do offer whole grade level screenings at grade 2 and grade 4.	10/21/2015 3:15 PM
561	My MAIN concern is that the specific general language that currently exists in the current operating standards has been removed. This language is NECESSARY to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. Therefore, I recommend the following: 1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/21/2015 2:48 PM
562	Removing the definitions leads to ambiguity and uncertainty on the identification and opportunities for gifted students. Clarity on the grade bands, K-3 and 3-6, would help determine if one assessment can be used at third grade to meet the assessment requirements of both grade bands.	10/21/2015 2:13 PM
563	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/21/2015 2:11 PM
564	Improve the language to improve gifted testing in early grades to be support the needs of young gifted students and provide more opportunities for their growth.	10/21/2015 1:50 PM
565	*Whole grade testing needs to be taken from K to 3rd grade down to K to 2nd grade in the Cognitive, Reading and Math areas. *To give districts clearer guidance, keep the general identification and service definitions/elements as stated in current Operating Standards.	10/21/2015 1:37 PM
566	Is it up to the districts to decide what qualifies as gifted? If that is the case, as students move between districts, there will be not consistency with regards to whether a student qualifies for gifted services.	10/21/2015 1:23 PM
567	Is it up to the districts to decide what qualifies a student as gifted? If this is the case, as students move between districts, there will be no consistency in whether they qualify for gifted services.	10/21/2015 1:20 PM
568	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/21/2015 1:15 PM
569	no	10/21/2015 1:12 PM

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570	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/21/2015 1:08 PM
571	Referral for testing from another student is unnecessary. Screening annually K-3 is too early and too frequent. In order to allow for proper development and avoid misidentification, screening should not be required prior to 3rd grade.	10/21/2015 1:04 PM
572	The Rule does not provide direction or guidance regarding screening, assessment, and identification. It seems that the revision is a skeleton of the previous Administrative Rule that more clearly explained the identification process and best practice. Especially in light of the fact that any district administrator can serve as coordinator, that person may not have adequate understanding of the process and may not refer to ORC. Most often, the Administrative Code is the guide that districts use.	10/21/2015 12:58 PM
573	The language that currently exists in the current operating standards should not have been removed. It is necessary to ensure that districts follow best practices and meet the letter and spirit of the Ohio Revised Code (ORC). The expansion of whole grade testing should remain. However, the language for that should promote improved testing in the early grades so that it is in a more effective and efficient way that supports the identification of under-represented student populations. Based on my decades of experience working with public school gifted intervention specialists, and understanding of policy and implementation, I would recommend: 1. ODE should revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. 2. ODE should incorporate the deleted elements from the identification section that are required in the ORC and which exist in the current operating standards. 3. ODE should reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/21/2015 12:50 PM
574	1. I do not like the idea of being forced to do whole grade screening for specific academic areas of science and social studies at the K-3 level. 2. (B)(1) language is vague. What is meant by "comprehensive", "consistent", and "inclusive"	10/21/2015 12:48 PM
575	Just suggestion, can counties have the same gifted identification? That was if student transfer between schools between counties there would not be any retesting or questions.	10/21/2015 12:31 PM
576	Whole grade testing should be K-2, not K-3, and limit identification in this grade band to superior cognitive ability and specific academic areas of math and reading. Incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/21/2015 12:30 PM
577	I have a draft copy that was attached to the email I received. I notice that the definition of giftedness (A)(1) and of areas of identification were struck through. I feel that the definition was very useful for both teachers and parents to help distinguish "giftedness" from "bright child".	10/21/2015 12:28 PM
578	As a past first and second grade teacher, I found that quite a few of my students earned gifted identifications in the areas of science and social studies which I felt were undeserved. As a current gifted coordinator looking at data, I find that many students who earned gifted identifications in the specific academic areas of science and social studies in the very early grades never re-earn those identifications in later grades, which makes me question the validity of those areas in the early years. I would like to see specific academic testing in the areas of math and reading, as well as superior cognitive ability testing in the K-3 years. And then specific academic testing in all four areas, as well as another superior cognitive ability testing in grades 4-8. I would like to see the general identification and service definitions as outlined in the current operating standards retained to provide clarity to districts.	10/21/2015 12:20 PM
579	Whole grade testing could be quite taxing.	10/21/2015 12:20 PM
580	I think that students at the younger ages (K-3) should be screened every year for gifted identification. This could make a big difference in the educational lives of children.	10/21/2015 12:19 PM
581	I can't believe the low level of support that we give to gifted children. I have seen few "rules" that would be so easy to manipulate and avoid. I am a school psychologist. As such, I obviously have a heart for our students with disabilities. However, when I look at the plight of a gifted student in the public school system, that is when my heart truly breaks. We need legislation (and funding!) that supports these students and gives them opportunities to test their upper limits.	10/21/2015 12:00 PM
582	no	10/21/2015 11:58 AM
583	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/21/2015 11:46 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

584	The specific language in the current Gifted Operating Standards allows for the specific application of best practices in gifted education. What is in the proposed rules are too broadly open to interpretation. As a past classroom teacher in grades 1 and 2, I do not like specific academic testing in the areas of science and social studies. It has been my experience that these two areas are over-identified when test -ing occurs at early elementary. As a gifted coordinator, I have found many students who earn science and social studies identifications in early grades never re-earn them at higher grades--leading me to again believe that this is an area of over-identification.	10/21/2015 11:44 AM
585	. 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits (without the sunset provisions) from the draft of the gifted operating standards approved by the State Board of Education Achievement Committee (11.11.13 draft). 2. Reinstate and improve service and instructional settings as provided in the current standards and adjusted to some extent in the 11.11.13 draft. 3. Remove the provision that untrained general education teachers provide service unless it is an accelerated classroom as outlined in the 11.11.13 draft. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC). 6. Reinstate instruction time requirement for teachers from current standards. 7. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 8. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 9. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 10. Revise whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that is required in ORC and which exists in the current operating standards. 11. With the reinstatement of service parameters as described above, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 12. Reinstate the district service plan as required by ORC. 13. Reinstate identification and service definitions as outlined in current operating standards 3301-51-15 and adjusted to some extent in the 11.11.13 draft.	10/21/2015 11:36 AM
586	I think communication with parents should be given a more specific timeline, i.e. during the 2nd and 3rd quarters. In this way, it will be easier to hold schools accountable for communicating with parents and for having completed screening assessments in a timely manner. Also, the section on whole grade screening is a little too vague to be ensured of completion. Is there a state-mandated test? What is the cut-off score; does it differ from one district to the next? I know some things are purposely vague to allow districts to make decisions relevant to them; however, I do not feel enough is outlined here to ensure that gifted students are identified or even challenged within the schools. Enrichment twice a year over a period of 9 months seems negligent. Are there partnerships available that schools could reach out to for further enrichment opportunities? These types of things should be detailed more explicitly to help teachers know who to contact, how to reach their gifted learners, etc.	10/21/2015 11:29 AM
587	Students should be identified in two sets of grade bands, but one should be in K-3, the other in 4-6. As it reads, "K-3 and another in 3-6", would allow only one opportunity~all testing in grade 3.	10/21/2015 11:00 AM
588	N/A	10/21/2015 10:48 AM
589	not at this time	10/21/2015 10:41 AM
590	Clarity for the following statute: 5) If the accommodations in a student's IEP or 504 Plan are not consistent with a test's allowable accommodations, a comparable test shall be used for that student.	10/21/2015 10:38 AM
591	Testing for gifted in kindergarten usually yields false results. Two times per year testing seems redundant. Performing tests at the beginning of the year is sufficient and yields correct results. Students are tested most of their academic career, so maybe we are over testing.	10/21/2015 10:37 AM
592	Perhaps clarity for the statute: 5) If the accommodations in a student's IEP or 504 Plan are not consistent with a test's allowable accommodations, a comparable test shall be used for that student.	10/21/2015 10:37 AM
593	Our students are already tested so much. Two mandatory grade level screenings just adds additional testing.	10/21/2015 10:26 AM
594	No	10/21/2015 10:21 AM
595	Define "superior cognitive ability"	10/21/2015 10:17 AM
596	1. Revise the whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that are required in ORC and which exist in the current operating standards. 2. Reinstate general identification and service definitions as outlined in current operating standards 3301-51-15 section A to provide clarity to districts.	10/21/2015 10:10 AM

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597	Clarify with operational definitions or expanded explanations of terms such as, "comprehensive" and "consistent" "and add examples. #5 is somewhat vague and would be better if there were an example or two. #6 The term "disadvantaged" needs to be defined or explained, or better yet discarded because it has a negative connotation. If it is meant to refer to children from lower income families, why not just say that. A gifted child or any child in that group may exhibit a high level of resiliency and, therefore, not be as disadvantaged by being lower income.	10/21/2015 9:58 AM
598	Whole grade testing K-2 may not be in the best interest of very young students as it favors both early readers and children whose parents provide many enrichment opportunities at home. Grade 3 may be a better starting point. In addition, requiring districts to conduct two whole-grade testing periods during the elementary years, when combined with required state assessments, may lead to testing fatigue and overload. In addition, it takes another valuable chunk of time out of the teaching/learning day. My recommendation would be requiring whole-grade testing once in the elementary years at a grade level that meets the district's needs. For example, if a district offers service beginning in middle school, whole-grade testing in 4th or 5th grade might be most appropriate. Additional testing could be done on a referral basis, as needed.	10/21/2015 9:43 AM
599	The identification process should be consistent across the state, not left up to districts. It should mirror "Child Find" policies for special Ed and screening and services should be provided for all starting in K. As it stands gifted children could go unidentified an underserved depending on their zip code (parent's affluence).	10/21/2015 9:36 AM
600	I really think that careful consideration needs to be given about requiring that districts give identification testing in K-2 and 3-6. Students are being tested at an alarming rate, and my fear is that this is just one more time to be tested. I think a good requirement would be once for the whole-group in K-6.	10/21/2015 9:19 AM
601	I am an elementary school counselor and totally believe in inclusion; however, sometimes the students that are already identified on an IEP as having an intellectual or cognitive delay are only experiencing stress and anxiety while taking these screeners. I feel as though the emotional impact on some students should be considered. I completely understand that some kids can be twice-exceptional, but leaving some decisions to the people that know the students best is necessary to preserve their academic self-concept as much as possible.	10/21/2015 9:10 AM
602	There needs to be more guidance as stated in the current rules.	10/21/2015 8:50 AM
603	Yearly testing for SC is too cumbersome and costly	10/21/2015 8:40 AM
604	I'm just glad that testing is offered in Kindergarten, for students like my daughter who already is above Kindergarten state levels at 4, and want their child to learn as much as they are able to with the supports that are needed in the classroom and beyond to further develop that depth of knowledge.	10/21/2015 8:25 AM
605	Delete #7.	10/21/2015 8:08 AM
606	Where is the funding coming for all of this mandated testing?	10/21/2015 8:08 AM
607	Districts shall report to the department all screening and identification data using guidelines prescribed by the department of education. This is another example of districts doing what is best for all students and another layer of tracking being added. There are new indicators that can track this on the local report card without adding more state control.	10/21/2015 7:55 AM
608	I would like to see something that requires districts to inform parents and students about their opportunity to self-refer.	10/21/2015 7:39 AM
609	If a child is identified gifted there should be classes in that grade level. Why do they have to wait until 3rd grade to receive services.	10/21/2015 5:06 AM
610	NO	10/20/2015 11:08 PM
611	The proposed rule specifies more opportunities for students (on a yearly basis) to be assessed for gifted identification. The proposed rule also specifies more stringent guidelines for assessing SWD or students of minority - which is EXCELLENT. However, at the same time, the proposed rule is VAGUE in nature... There are NO details as to what the tools are for assessment, identification, etc. Needs to be more specific in nature!	10/20/2015 10:44 PM
612	I think that trying to test a student with a range of test in one setting is at times over-whelming and causes some to just mark anything, other than taking a test in one area at different times, in a comfortable setting.	10/20/2015 9:54 PM
613	The proposed rule seems to make gifted identification a gray area up to district interpretation. That will lower the quality of gifted education in our state rather than raising it.	10/20/2015 9:23 PM
614	It references 3324 ok, and that has a comprehensive list of gifted indicators, but what happened to asking the district to describe HOW they will attend to these indicators? I'm not seeing it at all when I compare it to existing document. It is one thing for ODE to describe what its standards are, but how enforced? I see a real loss here by just saying "look at our guidelines and use those". ODE should expect these to be met. Please do so!	10/20/2015 8:55 PM
615	We spend so much time defining "gifted". It would be great to have this type of energy and effort towards truly serving these students.	10/20/2015 8:33 PM

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616	I would like to know where the money is coming from to do the whole grade level testing, and what will happen to districts that do not comply.	10/20/2015 8:31 PM
617	I would suggest that Ohio's definition of gifted be included in the new rule. I would also suggest that the identification criteria and procedures in Chapter 3324 of the Ohio Revised Code be included in the new rule so that all the qualifying information is in ONE document.	10/20/2015 8:22 PM
618	We are currently relying on inappropriate and ineffective identification of gifted students based upon MAP tests, which have shown to provide very inconsistent scores for students. Many students have qualified through MAP testing one time but never again. Also, the notion that once identified, always identified is inappropriate. Please consider that some Kindergarten-2nd grade students have been identified as gifted in the area of reading through the MAP test, yet the test was read aloud to them. Some of these students cannot read. This situation is not uncommon and is a disservice to that student, as well as the gifted program as a whole. It is also unfair to the district, which will have this student being included in its gifted population despite the obvious flaw in the identification process with the MAP test.	10/20/2015 8:19 PM
619	For identification of all gifted/potential gifted students, provide testing for all students on honor roll.	10/20/2015 8:10 PM
620	B. 5. Would like to see ELLs included: If the accommodations in a student's IEP or 504 Plan or allowable accommodations for English Language learners... It would be also be beneficial for districts if there were some kind of chart or guidance on the allowable accommodations for the state approved assessments.	10/20/2015 7:48 PM
621	I would remove the criteria that "other students" language. I would also remove the twice a year criteria. It doesn't make sense. We certainly would not allow those students who may require special education only two opportunities. Who wrote this? Many problems with the overall language!	10/20/2015 7:17 PM
622	None	10/20/2015 5:52 PM
623	Rules seem pretty prescriptive and don't seem to leave much flexibility for schools. Rules are unclear about whether gifted testing can use existing tests or require distinctive tests. I would prefer that any gifted placement be based on existing tests rather than adding new testing.	10/20/2015 4:28 PM
624	Measures used should be tested using sound testing standards.	10/20/2015 4:15 PM
625	In the areas of superior cognitive ability, math, reading, science and social studies, conduct yearly at least one whole grade screening in grade band K-3 and at least one whole grade screening in grade band 3-6; This is way too much testing, very costly and is ridiculous to include Science and Social Studies. Who pays for these tests? Are we supposed to pay for them out of our budget? Also, why we would we whole grade screen for cognitive ability in grades K-3..... IF we have to screen it should be starting in grade 4 where the results are more reliable. IF a district uses whole grade screening for K through 8 for achievement...and then uses these scores to determine cognitive ability testing...this should be an option.	10/20/2015 4:14 PM
626	inclusion of criteria to identify students who are gifted in the arts/music.	10/20/2015 4:11 PM
627	With providing opportunities twice per year for identification K-12, gifted identification in a non-serviced grade does not do much	10/20/2015 4:05 PM
628	Change 6a to have the bands of K-2 and 3-6 for identification.	10/20/2015 4:00 PM
629	The new language appears to create multiple, additional hoops for districts to go through but does nothing to address the type of instruction TAG students are receiving. This is another example of an unfunded mandate that will do nothing to actually address instruction.	10/20/2015 3:42 PM
630	I don't have changes, but our school will need to do more whole grade testing with this new rule.	10/20/2015 3:42 PM
631	I am concerned that students must be tested only if parents or teachers ask for it except for two times in an elementary student's time in school. What if the parents don't know to ask or aren't identified by a teacher. They lose out, if I am reading the standards correctly.	10/20/2015 3:39 PM
632	Testing is not the optimal method to identify gifted students. Teaching to the test might be a a practicable way (but not necessarily an efficient one) to comply with federal law in regards to the average student, the testing mentality is guaranteed to fail with gifted students, who are by definition those who think outside the box. This method would not have identified Albert Einstein. If you want to know who the promising gifted students are, ask their teachers.	10/20/2015 3:25 PM
633	Twice a year taken for testing takes up too much teaching time. They are two weeks where students aren't receiving adequate instruction. Students should be tested based on teacher and parent referral as per an IEP so as not to waste instructional opportunities for the other children.	10/20/2015 3:24 PM
634	I don't have changes for the rule, but if/when it passes, our school will need to do more whole grade level screening.	10/20/2015 3:20 PM
635	should pre-K be included for screening? this is not clear and grade 3 is included in each band referenced " In the areas of superior cognitive ability, math, reading, science and social studies, conduct yearly at least one whole grade screening in grade band K-3 and at least one whole grade screening in grade band 3-6"	10/20/2015 2:55 PM

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636	I would like to see funded support after identification.	10/20/2015 2:38 PM
637	I would like to see examples/scenarios/hypotheticals for each line item to make them more clear.	10/20/2015 2:33 PM
638	meanig for 6a you can give grade 3 and it will apply to K-6 whereas now we give at 3,5, 7 or 4 ,6 and 8. So districts can give one test at 3 and be done. not a good idea for many reasons.	10/20/2015 2:32 PM
639	Districts must recognize scores from any test approved by the department of education for gifted identification. Does this statement mean that gifted services starting in grade 3 will no longer require a specific minimum score on a standardized test for a child to receive gifted services?	10/20/2015 2:16 PM
640	Rule #4- Does this apply to students who move in and out of a district? I the old operating standards, scores had to be an approved assessment as well as within the last 24 months. I think that adding the time frame to the rule is important.	10/20/2015 2:15 PM
641	a) In the areas of superior cognitive ability, math, reading, science and social studies, conduct yearly at least one whole grade screening in grade band K-3 and at least one whole grade screening in grade band 3-6; I think this should read "conduct yearly at least one whole grade screening in grade band K-6." Students are already tested too much. Our school doesn't provide gifted services so this is yet another test for the sake of testing.	10/20/2015 2:15 PM
642	Keep those that were drafted in 2008 - they have served students well and prepares them for the future. This new proposal further hinders the education system.	10/20/2015 2:11 PM
643	My concerns are that tests that are given for other uses must be used for gifted identification. Some of these assessments are not designed for gifted identification, and can over identify. By requiring that these assessments given for other reasons to be used for gifted identification, you are doing a disservice to students. An assessment should not HAVE to by used for gifted identification simply because you give it.	10/20/2015 2:06 PM
644	I.D. them once in 3rd grade and be done with it.	10/20/2015 2:02 PM
645	It is sad that the State wants the Gifted students identified, but districts do NOT have to serve them. Many districts, because of funding problems, have done away with their gifted programs. When will the state see the importance of gifted students and the need to serve them? We should do everything we can to reach the potential of our gifted students. FUND GIFTED EDUCATION!	10/20/2015 2:00 PM
646	The fine arts (visual art, music, dance and theater) should be mentioned in this "Rule" since they are included in the gifted process in Ohio. If academic areas (math, science, language arts, etc.) are mentioned in the "Rule" then the fine arts need to be as well.	10/20/2015 1:58 PM
647	We have significant issues with the following: "In order to assure inclusion in screening and assessment procedures for all students, including minority and disadvantaged students, students with disabilities, and students for whom English is a second language, districts shall: (a) In the areas of superior cognitive ability, math, reading, science and social studies, conduct yearly at least one whole grade screening in grade band K-3 and at least one whole grade screening in grade band 3-6;" For these three reasons: 1. We prepare a data profile on each of our students currently. This data package allows us to target students for testing for gifted identification. Through this targeted approach, we are able to identify about 10- 15 % of our students in our buildings. We started doing this instead of whole grade screening because with whole grade screening we were picking up about 5 kids at a grade level per year at an expense of \$4000. Doing the whole grade screening, because of cost, we could only test at one grade. Now we have data on our kids, know who we want to assess, and know who we see potential in to grow academically. PLEASE, PLEASE do not make us go back to screening entire grade levels and missing gifted students. 2. Please do not mandate more testing for the boys and girls in Ohio - the legislature recently reduced testing times - please do not do this to our children. 3. The costs of whole grade screens far outweigh what is provided in state funding.	10/20/2015 1:56 PM
648	ODE needs to provide appropriate funding to help school district achieve the proposed rules.	10/20/2015 1:50 PM
649	There needs to be more specific standards on what test scores qualify for gifted services. Nothing in the new standards address the criteria to be identified as gifted.	10/20/2015 1:44 PM
650	There is not a need for two cognitive assessments -- one K-3 and another 4-6. Only one of these is truly needed.	10/20/2015 1:36 PM
651	I believe the rule should include the specific parameters under which a student will be identified as gifted. While these parameters are included in the ORC, they have been removed from the proposed rule, which is where most educators, parents, etc. go for this guidance. Including the language in the proposed rule helps ensure that children are identified appropriately and equally across the state.	10/20/2015 1:34 PM
652	Create a cut score on all assessments the state accepts to determine if a student is gifted. This will help to ensure students gifted in one district will qualify in another for the same level of service.	10/20/2015 1:34 PM
653	Trend data should also be considered in the identification process.	10/20/2015 1:34 PM
654	More specifics regarding twice exceptional	10/20/2015 1:28 PM

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655	No.	10/20/2015 1:21 PM
656	I think that districts enrolling students new to the district should be required to accept prior testing from the student's prior district and/or test new students within a 30 days for gifted identification.	10/20/2015 1:20 PM
657	In this proposed rule it appears that "gifted" is synonymous to academically advanced, and I would argue that for ELL or low SES or some minority students, their giftedness is being overlooked because they might not yet be academically advanced. I believe that the grade level indicator (i.e. advanced by one full year, etc) for gifted does not translate if using a non-verbal screener. Non-verbal screening should be clearly benchmarked as well, as that is how you may identify students in the above mentioned subgroups.	10/20/2015 1:19 PM
658	Get rid of "once gifted, always gifted" provision. Implement the 24-month window for qualifying scores consistent with original verbiage.	10/20/2015 1:18 PM
659	I find it hard to believe we will accommodate gifted students with a different test if accommodations on IEP or 504 aren't allowable, but not a student with disability. If a student can not read 3rd grade material they still have to take the third grade test without it being read to them. Doesn't make much sense to me! Where's the differentiated instruction come into effect when it comes down to test taking. That is where we need to work on closing the gap. The state needs to be a little differentiated when making the tests.	10/20/2015 1:14 PM
660	I have suggestions for 3324 Revised Code	10/20/2015 1:14 PM
661	B-4 Should state "Ohio" Department of Education. Students who have been identified at an out of state school may be identified from tests not on our approved list or may have cut scores lower than Ohio's. I recently had this happen, with a student who moved here from Georgia. He was identified there, but scores were too low for Ohio.	10/20/2015 1:06 PM
662	I have two concerns: 1. Relative to this line-- Districts must recognize scores from any test approved by the department of education for gifted identification. Why are districts asked to submit screening and identification plans if they are forced to use any assessment recognized by the state? This undermines local authority to determine which measurements are most suitable for their students. 2. Relative to whole grading screening and identification in grades K-2 and 3-6. I don't have a problem with using two bands- I actually think that is a good thing. However, I do not feel it is necessary to identify for science and social studies twice. Could this be revised to only include science and social studies in the 3-6 grade band?	10/20/2015 1:03 PM
663	Service should be required.	10/20/2015 12:52 PM
664	Needs to be WAAAAY more specific	10/20/2015 12:46 PM
665	There is no mention of identification for fine arts. Gifted arts students are not being identified and a process should be more clearly defined.	10/20/2015 12:45 PM
666	The only problem I have is the system that it used currently. My Son was referred to be tested; the woman over the program denied my Son the opportunity to be tested without even meeting or screening him?? So even after being referred by His teacher she never even brought him into the office?? Concerned Parent!	10/20/2015 12:42 PM
667	Does 4) refer to Ohio department of education or the US department of education? "4) Districts must recognize scores from any test approved by the department of education for gifted identification." Will there be a list somewhere of what tests are approved?	10/20/2015 12:39 PM
668	If I read it correctly, it states indentification can happen between grades 3-6. I believe it should be every year; not during a course of 3 years.	10/20/2015 12:38 PM
669	Twice exceptional students includes gifted students who may already have an IEP or 504 Plan, butit also includes gifted students who are not receiving those services. Students who are underachieving, which is a common theme among gifted students, are falling through the cracks of the system. They are difficult to identify as gifted because their areas of weakness may mask their giftedness. Their giftedness may mask their disabilities. And, it is also likely for the two to cancel each other out, making it seem as though an unidentified gifted child is of average intelligence and average abilities. I am a parent of a twice exceptional student who had spent many years in the public school district falling through the cracks because he was seen as too smart to need IEP accommodations. But his disabilities hold him back from achieving at the level where he should be. Gifted students need to socialize with like-minded students so they do not feel isolated or try to hide their unique and complex gifts in order to blend in with their peers. Gifted students are gifted all the time, so 45 minutes of pull-out once per week with a gifted coordinator does not support the true unique needs of gifted students. As you can see, I feel very passionate about gifted and twice exceptional students.	10/20/2015 12:37 PM
670	The last part is unclear. Do you test every year in K-3 and then every year in 3-6? That is a lot of testing if I am reading that correctly.	10/20/2015 12:27 PM
671	The rule is fine, but feel the funding is not there to serve the gifted students in our small town or rural schools. We identify, but then lack funds to enrich effectively in small groups. Teachers differentiate, but these students should also be accelerating in their learning as well.	10/20/2015 12:25 PM

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672	Once a year in grade bands and not being specific with types of testing opens the rule up to interpretation. Many districts do not want to take the time or money to identify gifted so they utilize testing that leaves some students unidentified. Districts that do not receive funding or do not provide service are less likely to want to test because they do not serve students anyway. There needs to be a push to serve students and not just identify them. Who cares if they are gifted if you are not going to do anything about it. Districts need the money to provide such services. Gifted education should be treated the same as special education. Compare the two and you will see where the issues lie.	10/20/2015 12:24 PM
673	More, more, more. That's what I see when I read this proposed rule. It will require MORE testing, MORE time away from instruction, and MORE expectation from the MORE students who will be identified as gifted. However, where is MORE money to support cost of additional testing? Where is the MORE money to be able to compensate teachers for an extended school day since we are losing more time to testing? Where is MORE money to hire additional gifted teachers and provide additional gifted services? Where are MORE gifted teachers? Do policy makers not know there is a shortage of gifted teachers, especially in rural settings? Having to hire gifted teacher for this year, there were only two candidates; both from North Carolina. They, then backed out because of our location. We recruited one of our ELA teachers with an interest to work under a Supplemental License. Policy makers keep bowing to gifted advocates and fail to realize the majority of the schools in this state do not have the resources to support the change initiative.	10/20/2015 12:21 PM
674	It will be great to mandate the districts to establish a structured gifted program beyond just identification.	10/20/2015 12:17 PM
675	~ delete science and social studies screening from K-3 band, I have found the long term accuracy not there ~ stipulate that testing in 3rd does not meet both requirements	10/20/2015 12:14 PM
676	As an EMIS Coordinator for a traditional school district, Gifted has always been the last thing on the mind of the Pupil Service office. I think a data collection tool would be most helpful for all stakeholders. There is no easy way to get the information to me for input. If someone could put together a program (like IEP anywhere) for the gifted piece-- it would be very helpful.	10/20/2015 11:55 AM
677	If we screen in the K-3 band (we do 2nd grade) WHY do we need to rescreen in the next year?	10/20/2015 11:54 AM
678	What testing would be appropriate. What if a child tests in gifted range one year and then falls out of gifted range?	10/20/2015 11:45 AM
679	The operating standards from 2008 had clear and effective guidelines. The current proposed is asking a district to screen all academic areas in grades K-3. For the areas of science and social studies, in the K-3 band, ID is a matter of exposure. If a child has had opportunities to visit the zoo, museums, etc. they are more likely to get the ID in science and social studies in this area. This is not a true representation of gifted in science and social studies. It's also problematic to state that a district has to use a certain assessment that the district is using for another purpose. Example MAP given in a district for grades K-3 for 3rd grade guarantee purposes must be used for gifted screen/ID in the same grades. Some tests are over identifiers for gifted at the lower grade levels. This again, is a misrepresentation of gifted and skewing the percentages on the gifted input points system. In stead of completely re-writing the 2008 standards, please get a group of people in the gifted field together to tweak the 2008 standards to provide better service. I understand ORC 3324 is referenced in the proposed standards, but it's important to have it spelled out. Especially if people will no longer need gifted certification to work in this field. Please put the following back in: (A) A student shall be identified as exhibiting "superior cognitive ability" if the student did either of the following within the preceding twenty-four months: (1) Scored two standard deviations above the mean, minus the standard error of measurement, on an approved individual standardized intelligence test administered by a licensed school psychologist or licensed psychologist; (2) Accomplished any one of the following: (a) Scored at least two standard deviations above the mean, minus the standard error of measurement, on an approved standardized group intelligence test; (b) Performed at or above the ninety-fifth percentile on an approved individual or group standardized basic or composite battery of a nationally normed achievement test; (c) Attained an approved score on one or more above-grade level standardized, nationally normed approved tests. (B) A student shall be identified as exhibiting "specific academic ability" superior to that of children of similar age in a specific academic ability field if within the preceding twenty-four months the student performs at or above the ninety-fifth percentile at the national level on an approved individual or group standardized achievement test of specific academic ability in that field. A student may be identified as gifted in more than one specific academic ability field. (C) A student shall be identified as exhibiting "creative thinking ability" superior to children of a similar age, if within the previous twenty-four months, the student scored one standard deviation above the mean, minus the standard error of measurement, on an approved individual or group intelligence test and also did either of the following: (1) Attained a sufficient score, as established by the department of education, on an approved individual or group test of creative ability; (2) Exhibited sufficient performance, as established by the department of education, on an approved checklist of creative behaviors. (D) A student shall be identified as exhibiting "visual or performing arts ability" superior to that of children of similar age if the student has done both of the following: (1) Demonstrated through a display of work, an audition, or other performance or exhibition, superior ability in a visual or performing arts area; (2) Exhibited sufficient performance, as established by the department of education, on an approved checklist of behaviors related to a specific arts area	10/20/2015 11:40 AM
680	The provisions do not provide a support system (financial- regarding personnel) to both identify and implement services. The report card now mandates that we show identification through WEP's. Almost half of our population is gifted according to the identification and yet there is little if any funding to implement services.	10/20/2015 11:36 AM

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681	4) Districts must recognize scores from any test approved by the department of education for gifted identification. Glve districts the freedom to determine the assessments. 5) If the accommodations in a student's IEP or 504 Plan are not consistent with a test's allowable accommodations, a comparable test shall be used for that student. Students that are on an IEP or 504 should be able to be exempted from gifted testing with parental permission.	10/20/2015 11:35 AM
682	Whole grade screening in science and social studies is not needed. It is going to be a large expense to districts and very few districts serve those areas in young grades.	10/20/2015 11:33 AM
683	n/a	10/20/2015 11:28 AM
684	Service to students should be required by all districts, not just identification. Ohio has never had the focus right. Every student should be receiving the education they need. What good does identifying do if there isn't service?	10/20/2015 11:18 AM
685	If the accommodations in a student's IEP or 504 Plan are not consistent with a test's allowable accommodations, a comparable test shall be used for that student. This may be hard if the district has not purchased additional testing materials.	10/20/2015 11:15 AM
686	No	10/20/2015 11:06 AM
687	None at this time.	10/20/2015 11:05 AM
688	Identification should be consistent across the state (and as consistent as possible with other states). District-dependent identification will result in too wide a variation in the determination of services. Just as it is problematic for a typical student to face a wide shift in material being taught upon a move to a different district, gifted students would face the same dangers here. A seventh grader in advanced math in our current district, as an example, will have completed the eighth grade math curriculum by the end of seventh grade. If that same student were to move to a district with different rules of identification, she may be forced to essentially repeat an entire year of studies due to these inconsistencies across Ohio districts. The ramifications of this for a student who is currently placed in all advanced courses, as my own daughter is, would be far more widespread, as the disturbance in her education could take place across multiple subject areas. Opening the doors for such situations to occur by broadening the standards of gifted identification so severely is an unacceptable option.	10/20/2015 11:03 AM
689	Universal timing for screening statewide.	10/20/2015 11:03 AM
690	It needs to have specific tests listed and specific date ranges. I don't believe gifted identification should be determined by a multiple choice test, that may or not be slanted, or a test where a student has a 25-33% chance of guessing the correct answer.	10/20/2015 11:02 AM
691	If you are going to be specific on identification, you need to set a specific grade level where students are tested unless they are referred by a parent. Subject area wise, it is way to early to identify a student as gifted in the elementary areas. They may be learning faster or mature faster; that does not make a student gifted.	10/20/2015 10:55 AM
692	We have grave concerns with this portion of the proposed rule: "In the areas of superior cognitive ability, math, reading, science and social studies, conduct yearly at least one whole grade screening in grade band K-3 and at least one whole grade screening in grade band 3-6" With the use of OIP, FIP and the analysis teachers, principals and districts do on individual students data, we find are highly concerned that we are going to be told when and how we need to screen students for gifted identification. The previous Operating Standards had this as a local decision which in our minds is what it should be. By using screeners and pre-screeners, and NOT testing just one grade or two grade levels through a whole grade screen but instead testing individual students at multiple grade-levels based on looking at individual student data and testing profiles, we are identifying more gifted students that ever before. We used to do whole grade screens and stopped because we were not finding our kids that way. This will be a step back and step towards state control rather than local control. We highly object to the inclusion of this measure.	10/20/2015 10:54 AM
693	The proposed rule indicates that we will continue testing the living heck out of every student we have. Two opportunities per year?!?...because the research evidence supports it; because an Ohio School Board member wants it; why? We are getting KILLED in the field for testing too much and rule like this tie our hands.	10/20/2015 10:51 AM
694	Include wording to utilize universally accepted screeners, ie used for multiple purposes.	10/20/2015 10:49 AM
695	The definition is within the ORC 3324 but is not contained within this rule, per se. I assume that the notation that ORC 3324 is to be used is helpful but the procedures described here seem to me to be relatively vague.	10/20/2015 10:43 AM
696	Specificity needed...cut off ranges?	10/20/2015 10:40 AM
697	Go to the old rule and put things back. Accountability of gifted funding. Increase Gifted funding to actually support the gifted population.	10/20/2015 10:36 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

698	I need more clarification on #3: Regardless of the grade levels where gifted services are offered, districts must provide at least two opportunities per year for gifted identification testing in grades K-12 if students request testing or are referred by parents, teachers or other students. Needs clarification -- Does this mean two times a year we do whole grade screenings for grades K-12? That is too much. I would specify whole grade screenings in grade bands (K-3 and 3-6); and then screening upon referral from teachers and/or parent request.	10/20/2015 10:35 AM
699	*The ID rules need to be communicated to parents regularly and positively encourage parents and teachers to nominate children for testing. *The ID rules need a process for identifying gifted children with disabilities, e.g. using the GAI instead of FSIQ where a disability impairs working memory or processing speed. *The ID rules need to positively endorse accepting testing from licensed psychologists outside of the school district.	10/20/2015 10:33 AM
700	Stop watering down what "gifted" actually means. The worst of this is Ohio's ridiculous "once ID'd as gifted, always gifted" provision. I know children who have simply had one good test day and never approached those scores again, yet they carry the "gifted" tag throughout their academic career. I have two daughters who have been ID'd as gifted in 5 different areas. My girls are very intelligent and have certain gifts, but that doesn't mean they're "gifted" in each of those areas. It simply means they're bright kids who have tested well comparatively to others.	10/20/2015 10:32 AM
701	Clear on identification. More detail likely needed to provide guidance on how schools will provide the services for gifted students is needed.	10/20/2015 10:31 AM
702	Social Studies and Science ID tools in grades K-3 are difficult to find. Students must have exposure to Science and Social Studies curriculum... it is not as developmental as the other content areas. It is in the best interest of better identification of truly gifted S. St. and Science students to wait until the 3-12 band to ID.	10/20/2015 10:28 AM
703	Testing all students and all students twice a year is another testing requirement that takes a way from testing. Testing 100% of students to meet criteria for less than 10 - 15% that qualify is not efficient or necessary. Use state testing requirements that already exist.	10/20/2015 10:26 AM
704	6(a) In the areas of superior cognitive ability, math, reading, science and social studies, conduct yearly at least one whole grade screening in grade band K-3 and at least one whole grade screening in grade band 3-6. IS THERE A REASON THAT THESE TWO GRADE BANDS OVERLAP? Compliance for a district would be to target grade 3 as to take care of both grade bands in one district whole grade level screening.	10/20/2015 10:22 AM
705	Mass screening of students to determine whether a student is gifted does not accurately or truly identify gifted kids. Students that score in particular ranges in screening should then be tested individually on specific tests to identify gifted students. The tests used to identify gifted students in SS and Science does not require any divergent thinking or problem solving. If they child is well read, he/she may score in the gifted range. Being well read does not equate with being gifted.	10/20/2015 10:16 AM
706	Keep current language	10/20/2015 10:15 AM
707	In the areas of superior cognitive ability, math, reading, science and social studies, conduct yearly at least one whole grade screening in grade band K-3 and at least one whole grade screening in grade band 3-6 I believe that the grade bands should be changed from K-3 and 3-6 to K-2 and 3-6. By having it listed as K-3 and 3-6 my fear is that some districts will only whole group screen at Grade 3 and that will be it.	10/20/2015 10:14 AM
708	I am glad that the stipulation to retest an out of state student if ID is more than 24 months old is removed. If the instrument used is on our approved list, that should be the case. Gifted students are just as statistically significantly different from average than the other end of the spectrum. Special education used multi factored evaluation and does not base identification for ever and ever on one single test score. Gifted students should be identified in the same multi factored way.	10/20/2015 10:12 AM
709	Adding another assessment in grades K-6 annually will be difficult.	10/20/2015 10:10 AM
710	The screening for superior cognition should only be required for language arts and math. Our school can only serve elementary students in language arts and math.	10/20/2015 10:09 AM
711	Allow the district to decide if and how to administer grade level assessments.	10/20/2015 10:07 AM
712	There is very little guidance on this process for school districts.	10/20/2015 10:03 AM
713	My suggestion are: That it becomes more clear that parents of gifted students must be notified of test results. (I don't believe that occurs many places) Also, I would suggest that gifted students must be served, not just identified.	10/20/2015 10:02 AM
714	I have no problem with the whole-grade screenings because our district is already doing that. However, we have had language in 3324.01-.07 that is troublesome. The language equates ability with achievement for identifying students as Superior Cognitive. I know from many years of assessment that students obtaining 95% on an achievement assessment may or may not have high ability. I understand this language allows for rural and urban districts to potentially identify more students, but equating ability and achievement is flawed. Superior Cognitive should only be based on ability assessments. Regarding the allowable accommodations for 504 and IEP students, I would want some kind of assurance that the test results will be valid and not artificially high.	10/20/2015 9:53 AM

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715	no	10/20/2015 9:52 AM
716	I do not think mass screenings in the areas of social studies and science are needed at the K-3 grade levels. I feel it is a waste of time and money.	10/20/2015 9:52 AM
717	delete social studies and science for K-3 band glad K-3 band and 3-6 exists...please stipulate that testing in 3rd grade alone does not meet both testing requirements	10/20/2015 9:41 AM
718	Will the rule also include testing in the subject areas for whole grade bands or just the superior cognitive testing?	10/20/2015 9:38 AM
719	No.	10/20/2015 9:30 AM
720	Do students remain identified for life? Services mandate?	10/20/2015 9:29 AM
721	Leaving the screening grades up to each district.	10/20/2015 9:27 AM
722	How does these rules/laws apply to Catholic schools? Do they go by the same rules?	10/20/2015 9:26 AM
723	Testing yearly in the K-3 grade band seems excessive.	10/20/2015 9:25 AM
724	Identification expectations are clear. Service options are grey - and if service options are mandated, they must be matched with funding support.	10/20/2015 9:23 AM
725	I don't want to see the schools get bogged down with more testing. I would suggest once in grades 2-6.	10/20/2015 9:21 AM
726	None	10/20/2015 9:17 AM
727	delete social studies and science screening from K-3 band	10/20/2015 9:16 AM
728	No	10/20/2015 9:15 AM
729	There seems to be the assumption that the scores from and interpretation of approved instrumentation identification is consistent and equivalent. This is very much NOT the case and needs to be addressed. For example, a "130" on the Stanford-Binet has a different meaning than a "130" on the WISC V. Further, in some cases there is no appropriate assessment instrument to validly and reliably assess over cognitive functioning, such as in the case of a blind student or severely autistic student. Finally, the cost of the instrumentation is prohibitive for small districts and this needs to be addressed.	10/20/2015 9:05 AM
730	if there is a rule that only 20 students be part of a class, I would raise that limit so more can be a part of the class.	10/20/2015 8:56 AM
731	I do NOT agree with this statement: Regardless of the grade levels where gifted services are offered, districts must provide at least two opportunities per year for gifted identification testing in grades K-12 if students request testing or are referred by parents, teachers or other students. As a small rural district, we have not turned down parent requests for gifted testing. We do make sure there is at least a year between tests to make sure the tests are valid and the students do not "learn" the tests. We do not own a plethora of tests to give for gifted identification and want to retain the integrity of the tests we do have.	10/20/2015 8:55 AM
732	No	10/20/2015 8:51 AM
733	After identification there is very little service. Service should be mandated in some way. These children are the most left behind children presently in public education especially in a more rural setting. Administration is more worried about the other end of the spectrum of special education.	10/20/2015 8:47 AM
734	Too much testing already. If two times per year, that is more time the student will lose instructional time.	10/20/2015 8:46 AM
735	none	10/20/2015 8:46 AM
736	Give more consideration to kids who may have other disabilities and still be gifted. Find a way to test all of these kids because they slip through the cracks otherwise.	10/20/2015 8:45 AM
737	Testing at an early age in the academic areas often leads to a false identification in school districts where the students are coming from an enriched home environment. Early reading and math skills sometimes do not continue on at the 95% and higher level when the content becomes more difficult. Perhaps the most recent score should be the one considered when identifying students although I realize that the philosophy is that one cannot become "ungifted."	10/20/2015 8:42 AM
738	If a student is identified as gifted as part of the IEP assessment process that occurs outside of the district (i.e. at the Ohio School for the Deaf or the State School for the Blind), the district should accept that test score even though it might be a different test than one that the district normally administers.	10/20/2015 8:42 AM
739	When you take out the specific rules from the previous operating standards, this allows districts to cut all services for gifted students since the State of Ohio does not mandate gifted services. The proposed operating standards allows for any setting to be classified as service, which in essence means that there is no qualified service for gifted students.	10/20/2015 8:42 AM
740	Yes get rid of them unless you're going to actually fund them.	10/20/2015 8:39 AM

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741	This area needs more specific language on the technical requirements of gifted identification (i.e., two standard deviations above the mean or 95% for subject area ID. If I were a new coordinator, this draft would not provide enough support to guide me in creating an ID plan that works.	10/20/2015 8:38 AM
742	Testing two times each year is too much. Takes away from instructional time. Allowing opportunities to re-take a test if close in a particular area would be best or by teacher recommendation.	10/20/2015 8:35 AM
743	Once a student is ID'd as gifted in an area, that gifted identification should be reported to the department annually as the rule is 'once identified as gifted always report the student as gifted'. The department can use the SSID (state student identifier) to cross check data across districts to ensure that once a student is ID'd as gifted districts continue to report. Then annually report the screened, assessed, served (courses, programs) along with the cumulative ID'd gifted information (area and date) to the department (EMIS). The proposed change (clarification) is to mandate the department to cross check SSID's (and generate a report and share back with districts) as the students move to ensure each district is reporting the previously ID'd students by each district involved in a student's educational career. This would prevent districts from re-ID'ing students and/or not serving students based on previous district gifted identification.	10/20/2015 8:33 AM
744	Districts should publish testing windows and explicitly provide this information to parents at the start of the school year, and well before the close of the initial testing window.	10/20/2015 8:31 AM
745	I think more specific language is needed for giving the assessments to IEP and 504 students. I also think the list of approved assessments to identify students needs adjusted and reviewed. The current list is dated and districts have been using dated tests in wrong ways. For example, the Terra Nova language test can not be used to identify students in writing. I'm not sure there is even a quality writing assessment on the current approved list to identify students in that area.	10/20/2015 8:30 AM
746	While I support the idea of some local control, the rules are quite vague and open ended in terms of what districts must ensure.	10/20/2015 8:26 AM
747	It is fine, but you are missing screening for HS students. I also think that another unfunded mandate by the state is unnecessary.	10/20/2015 8:26 AM
748	All children and school districts should be evaluated on a base line measurement: ie special attention or focus should not be given to disadvantaged students. A middle class gifted student is not less important than a disadvantaged child. Identification of a special gift should be blindly identified and cultivated regardless of race, class or school district.	10/20/2015 8:25 AM
749	While I agree that students should be screened for testing, this is an unfunded mandate that places a burden on local agencies. There is too much bureaucracy involved in all levels of education.	10/20/2015 8:25 AM
750	I do NOT agree with the following rule: Regardless of the grade levels where gifted services are offered, districts must provide at least two opportunities per year for gifted identification testing in grades K-12 if students request testing or are referred by parents, teachers or other students. One opportunity per year is plenty for requested testing. We are a small rural/small town school and have never turned down a parent request for gifted testing. We do not own a plethora of tests to choose from. We make sure there is at least a year between tests so that students don't "learn" the test(s).	10/20/2015 8:24 AM
751	I would eliminate science and social studies from the screening process and make those areas optional for schools. It is going to be hard enough to serve all students identified in math and reading. Identification in these areas, particularly in the K-3 grade band, is unreliable.	10/20/2015 8:22 AM
752	Whole grade level testing is very hard for large school districts in these times of mandated state testing not to mention very expensive. We do whole grade level testing in second grade - which is not included in state testing.	10/20/2015 8:20 AM
753	The current guidelines have resulted in accurate diagnosis of gifted students. Our top students are routinely those identified as gifted in early grades. The proposal seems to add testing requirements and increase acceptable test measures. This will result in unpredictable results as different measures are utilized.	10/20/2015 8:20 AM
754	Give the education leaders the ability to make the guidelines and the resources to follow them.	10/20/2015 8:17 AM
755	My school does not serve gifted students and I think it is very sad.	10/20/2015 8:16 AM
756	No	10/20/2015 8:15 AM
757	Eliminate the twice per year option and reduce the number of times that a district must conduct the testing for full grades.	10/20/2015 8:10 AM
758	No.	10/20/2015 8:07 AM
759	Standardized testing for gifted identification that all schools follow, as well as identified grades that this should happen in.	10/20/2015 8:03 AM
760	NA	10/20/2015 8:02 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

761	Well first we have to take care of Special needs students, now all of this for gifted (which involves even more assessments) never does any one care about our regular students whom must be ignored in order to take care of all others (Where are their rights? and where is the money to continue to pay for assessments etc to do all of this and the time needed	10/20/2015 8:01 AM
762	When are we going to include alternative assessments for the identification of gifted students? I run into this time and time, again. A student who clearly is gifted, but does not perform well on standardized tests. Isn't it time to be a little more progressive in our thinking?	10/20/2015 7:59 AM
763	It doesn't explain other tools that can be used to identify. For example, now grades and teacher recommendations are not permitted to be considered for identification, but this is not part of the rules draft.	10/20/2015 7:59 AM
764	You are going the wrong way. The existing rules measure key indicators at the beginning, during the process, and at the end of the gifted student's education. You are now mostly measuring the end, with a few items at the beginning. GM used to do that. They measured the results at the end. Then, they had incredible quality problems and almost went bankrupt. Now, they measure key indicators at the beginning, during the process, and at the end. That way they have an understanding of what is working all along the way so they can expect a measure of success at the end. You are doing the opposite with your proposed rules. A child only goes through the education system once. We can't screw that up. You need measures at the beginning, during the process, and at the end so you can expect a measure of success when the child leaves public education. To do otherwise is bad policy and puts students at risk. That's a risk we cannot take. I am a "government get out of my business" guy. But, this is a case where you are taking the guardrails away in the wrong place.	10/20/2015 7:58 AM
765	Clearer guidelines for identifying creative thinking, fine arts.	10/20/2015 7:56 AM
766	We need for the identification process and expectations after the identification has taken place to be consistent across the state public and charter.	10/20/2015 7:54 AM
767	List acceptable tests.	10/20/2015 7:51 AM
768	No.	10/20/2015 7:50 AM
769	How about providing adequate funding	10/20/2015 7:47 AM
770	The challenge is servicing the gifted population once it is identified. Need more PD opportunities for staff to get certified to service the gifted students.	10/20/2015 7:40 AM
771	I don't like the idea that students will be tested every year in grades 3-6.	10/20/2015 7:39 AM
772	That the state will provide some sort of funding to help support these students, much like they do SPED students.	10/20/2015 7:35 AM
773	Will there be a specific list of what tools may be used for screening within a district? Will all districts be required to use one specific screening tool?	10/20/2015 7:31 AM
774	None.	10/20/2015 7:30 AM
775	Clear Notification For Students In Primary Grades K-2 Outline of services that will be provided. Accountability of why or why not services are not being provided for all students.	10/20/2015 7:22 AM
776	No	10/20/2015 7:16 AM
777	The proposed rules do not specify the qualifications of the district employee performing the identification testing, in order to ensure valid testing and interpretation of results. The rules do not differentiate between screening and identification testing, nor do they protect the right of the parents to know the results of assessments performed on their minor child. These rules pretty much cut out the role of the parent in guiding their child's educational choices.	10/20/2015 7:08 AM
778	Only require 1 grade band screening	10/20/2015 6:55 AM
779	There is no link to the referred Code- so I am not clear on what that criteria is... a quick synopsis in text is always nice. As I read the revision, the intent I understood is a more inclusive identification of gifted students that might not be traditionally tagged as gifted (those on IEP, ESOL, etc.). However, the means for identification is still an annual grade level test which only identifies those that are blessed as good test takers. I hypothesize these students will still go under the radar unless alternative individualized testing is administered like Wechsler Intelligence Tests. I fear the this will be just another test. As a parent of a 2E (twice exceptional) child- she scores Very Superior in her cognitive ability for Perceptual Reasoning and Borderline Low cognitively in her PSI (ability to discriminate visual information)... traditional testing in her district would have NEVER identified her giftedness. If testing is left to the district level, the gap between those with resources to provide quality evaluations vs a simple "online test" will continue to miss the non-traditionally tagged gifted kids. As I support the intent, I believe more of the "how" is needed in guidance to districts. This could be addressed by the code referred to in text. Other: Does this give parents the right to petition their child into gifted services? Is criteria for identification more subjective? Why 2 years of data? We have kindergarteners attending all day school and taking tests on ipads- can something not be done earlier than 2nd grade?	10/20/2015 6:52 AM

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780	The requirement of Science and Social Studies should be removed. The identification in these two areas seems to be biased against some subgroups. Student identification at an early age is skewed by life experiences.	10/20/2015 6:34 AM
781	The mandated intervals are too much. Districts are more likely to drop Gifted services for all rather than support it. The public has spoken. There is simply too much testing. I would recommend once in early years (Grades 1-2) and a re-test in grades 5-6 to weed out precocious readers. Screening on recommendation every 18 months is reasonable. There are some parents that want the identification so badly they repeat tests too often taking a huge toll on the student's emotional state (repeated rejections.) Having every accepted test is too broad. Parents will be "shopping for tests" , again, taking a toll on the student when he/she doesn't pass. It is also too difficult to districts to employ. I doubt the State of Ohio is funding this. Make it reasonable for districts or you will see programs cancelled throughout the state.	10/20/2015 6:32 AM
782	What is the definition of gift? Please include specific criteria.	10/20/2015 5:25 AM
783	Requiring even more testing (twice yearly??) without funding or a support system will do even more to overburden districts - this requires even more administrators rather than educators	10/20/2015 4:38 AM
784	There is a huge difference between gifted and hard working students. I am the parent if 2 4.0 validictorians one who graduated from college in 3 years and interns with the US Secret Service and is going to law school. Neither was gifted nor are all of the 29 Freshman I have in my honors World History class	10/20/2015 12:17 AM
785	Students should also have an opportunity to be classified by community organizations who provide retired or current educational professionals in elementary education thru college level expertise to recommend gifted testing.	10/20/2015 12:07 AM
786	Requirements for minimum programming for gifted programs are missing.	10/20/2015 12:05 AM
787	Go back to specific identification standards used in the previous version of these operating standards - two standard deviations above the mean or 95%, etc. The standards as proposed as so vague as to be completely and utterly useless for the purpose of ensuring that there is any sort of uniformity or consistency (which is specifically mentioned as necessary in Section B (1)) in gifted identification from district to district. Especially considering the fact that gifted is now a grouping on the state report card, specific and measurable set standards are absolutely ESSENTIAL for ensuring an "apples to apples" comparison of gifted services across the state. Also, all students need to be tested, not just upon request (as mentioned in section B (3).	10/19/2015 10:52 PM
788	No - I like it as written.	10/19/2015 10:52 PM
789	yes, it's not just about identification.....it's about providing services too. What good is identification if nothing is done about it.	10/19/2015 10:33 PM
790	what, if any, outside testing can be used to identify students as gifted? what qualifications must the tester have?	10/19/2015 10:22 PM
791	Define Chapter 3324 of the Ohio Revised Code	10/19/2015 9:56 PM
792	These rules simply dictate the identification process which doesn't account for any services received. What good is identification if it doesn't result in any change of action in the educational service of a child?	10/19/2015 9:51 PM
793	What is the rationale behind the mandate for 1) whole grade screening two times in K-6? 2) whole grade screening in ALL content areas? (Why science and social studies????) Because the bands are K-3 and 3-6, does assessing one time in gr. 3 meet the requirements of both bands? Changes: If whole grade screening is going to be mandated, let districts decide the area(s) for based upon district needs and/or services.	10/19/2015 9:36 PM
794	What if the tests selected by the ODE are not standardized?	10/19/2015 9:36 PM
795	In the areas of superior cognitive ability, math, reading, science and social studies, conduct yearly at least one whole grade screening in grade band K-3 and at least one whole grade screening in grade band 3-6; Specific Changes: Superior cognitive ability and/or math, reading, science, social studies,	10/19/2015 9:34 PM
796	As I pursue my gifted endorsement licensure, I continue to be disappointed in Ohio's efforts in comparison to other states. This plan is so vague that there is no guarantee that struggling districts will identify and properly service their students. It also does not give much consideration to those who are gifted and talented in creative and artistic ways. The identification has become more broad, which allows more students to qualify, but the levels of servicing are not clearly stated. Too much variation can still exist from district to district, making gifted servicing inequitable. I do appreciate that you are considering the needs of the culturally diverse and economically disadvantaged when creating the identification process. I am excited that you are reexamining giftedness in our state. Identification sets the tone for programming, so please continue to carefully consider your choices and their wide-reaching effects.	10/19/2015 9:30 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

797	Who audits the school districts? How often are they audited? Can a student be in a gifted program then dismissed from the program because of changes? Does the person in charge of the gifted program have to have specific certification? Our son was in the gifted program in third and fourth grade at Ridgewood Local School District. When he was in fifth grade, more students were tested and a handful who had been in the gifted program were kicked out of the program and others were admitted. He was re-admitted the in sixth grade, but was disappointed because instead of doing extraordinary things, the program was mostly reading books on a required reading list.	10/19/2015 9:29 PM
798	No I do not have specific changes for the proposed rules related to identification	10/19/2015 9:16 PM
799	Needs to be a limit on the number of times a student can be tested. Some parents will continue to retest until their child qualifies (working the system) while other parents won't request a retest unless the school suggests it.	10/19/2015 9:10 PM
800	It would be very helpful if you would include the State of Ohio criteria for identification - the scores needed to be identified as gifted both cognitively and in academic achievement. These scores help our district determine the scores for services. When the State establishes the criteria for identification it gives backbone to our criteria for services. Otherwise, our criteria can be view as too arbitrary.	10/19/2015 9:10 PM
801	It would be helpful if the State established the criteria for identification as in the past.	10/19/2015 9:05 PM
802	There is no mention of how to ameliorate the impact of a second language or a disability, etc. on testing results. This needs to be explicitly addressed.	10/19/2015 9:02 PM
803	We must be able to use assessments that we already give. We are assessing too much and losing instructional time.	10/19/2015 9:01 PM
804	What about servicing the identified students?	10/19/2015 8:50 PM
805	More identification options for non-english speaking learners	10/19/2015 8:47 PM
806	The measure to be used, how it is administered and what if any accommodations are allowed should be more specific	10/19/2015 8:44 PM
807	I don't see much difference in what has been done in the past. I do think that identifying gifted students as early as possible, like in Kindergarten is MUCH better than waiting till 3rd grade as by then most of the truly gifted children will have given up. What is the point in Identifying the gifted IF you don't do anything for them? Gifted children, especially Profoundly Gifted children need a very special education with teachers who have been trained in teaching the gifted. Ohio does not have this or do this. I home school my child because my school district has NEVER been able to meet his educational needs. And now the State is NOT paying the tuition costs for CCP for homeschoolers. Ohio is still NOT doing much for its gifted students, especially for those who are very gifted.	10/19/2015 8:43 PM
808	Identifying students in K-1 using MAP/NWEA often mistakenly identifies students because of the adult who administered the assessment. There are no opportunities to verify the students are truly gifted. I recommend two assessments before identifying, and yes, this could be different times or years instead of hit the score once and always identified. Many districts have over identified through the years.	10/19/2015 8:39 PM
809	Screening in grades k-3 for science and social studies should be eliminated as many whole grade level assessments do not have a science or social studies component.	10/19/2015 8:24 PM
810	We need to increase the number of Universal Screeners required by Districts in order to ensure under represented groups are being fairly identified.	10/19/2015 8:15 PM
811	Include much of the language in ORC related to specific areas of gifted identification and test usage. The addition of two required whole grade screenings is very positive, especially for students from underrepresented populations. I advocated for them back in 2013. But, consider changing K-3 to K-2 and remove science and social studies from the K-2 requirement. That is 1-1 ½ additional hours of testing in content areas typically taught fully integrated in reading and math at the primary levels. We also know districts typically serve cognitive ability, reading and/or math at the elementary levels and add science and social studies at the middle or high school levels. So, whole grade screening for these prior to middle school makes sense, but not necessarily in elementary school. While I fully support whole grade screening in cognitive ability, reading, and math at the K-2 band and again the 3-6 band with science and social studies at the 3-6 band, adding science and social studies to the K-2 band subjects our students to testing that likely isn't necessary.	10/19/2015 8:05 PM
812	I would like to see a middle school ban for identification also.	10/19/2015 8:03 PM
813	I like that it is inclusive and not subject to subjective decisions by a school district. I also like that emphasis on twice exceptional is indicated.	10/19/2015 7:54 PM
814	How will the State support the financial burden testing in grade bands K-3 and 3-6 given limited funding and what \$ have is needed to serve identified gifted students in some manner?	10/19/2015 7:53 PM
815	I struggle with the once identified always identified especially in the primary grades where a student may qualify based on one score in 1st grade or even Kindergarten and then never come close to qualifying ever again. Is the student truly gifted or did they benefit from an enriched home environment during their early years.	10/19/2015 7:42 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

816	There are different facets of gifted students....creative thinking, intellectual, visual arts etc. The identification process must not simply be intellectual testing or many gifted children fall through the cracks and do not receive services.	10/19/2015 7:42 PM
817	Information needs to be sent home to parents with explanations. Not just scores and a yes or no marked. Districts should be required to inform parents and be clear with labels. A teacher will say your child is gifted but then you get no official notice from the district in regards to the child. Districts also need to be required to provide services regardless of age. If a child in 1st grade is working at the end of second grade level something needs to be done instead of the child coming home crying because they are bored and teachers saying there is nothing they can do. Gifted children in lower elementary grades are not being helped by this. Gifted k-3 students should not be expected to be the teachers helpers or given extra coloring sheets because they are done and bored.	10/19/2015 7:37 PM
818	This was very vague	10/19/2015 7:32 PM
819	The current rules are sufficient. Placing additional requirements on schools is unfair without additional funding. New and additional rules and regulations should include additional funding. Unfunded mandates should apply to private and charter schools as well (any school receiving state funding)!	10/19/2015 7:29 PM
820	No	10/19/2015 7:29 PM
821	Students who are held back so that they will qualify for a district's gifted program has to be figured into the equation of how we identify gifted students. The Indian Hill School District's parents have a decades-long pattern of doing this.	10/19/2015 7:27 PM
822	Teachers should be educated on the potential twice exceptional student who may slip through the cracks and not receive appropriate identification when giftedness is masked by behavioral or learning disabilities. I do not believe this is widely acknowledged by teachers and these students are often overlooked.	10/19/2015 7:25 PM
823	I believe that the gifted rule that is currently in place gives MUCH more stringent requirements for gifted services to which schools need to adhere. This proposed gifted rule is VERY vague and DOES NOT provide enough of the regulations needed to ensure that gifted students are being served by highly qualified teachers in classrooms where the class sizes are limited. Removing caps on case load and class size for gifted intervention specialists is a big mistake. Removing regulations regarding minutes of service required is also a mistake. Allowing individuals in a school to serve as a gifted coordinator without gifted certification and credentials is another huge mistake. I believe that the proposed rules NEED to include the regulations and requirements included in the expiring rules. The proposed rules are EXTREMELY vague and leave too much room for interpretation between districts. In order for ALL gifted students to get quality gifted services across the state of Ohio, I believe the expiring rules need to be included in the new proposed rules.	10/19/2015 7:18 PM
824	Unless the Department of Education provides a standard evaluation tool that ALL districts use and the financial resources to support ongoing assessment (ex. Every 3 years) I think this is a waste of time.	10/19/2015 7:17 PM
825	multiplicity of positive identification screenings	10/19/2015 7:17 PM
826	Specific tests would be helpful; IQ only or performance tests.	10/19/2015 7:05 PM
827	Are resources for gifted students clearly defined? What about socioeconomic issues? Do they involve educational psychology? This helps to clarify. It enables my research in educational psychology to evolve.	10/19/2015 7:05 PM
828	No	10/19/2015 6:49 PM
829	Many districts are using MAPS as their assessment tool at this point but I'm not certain that this tool reaches all grade levels with the certainty that a district needs when identifying gifted.	10/19/2015 6:47 PM
830	Our district has found that using various approved ode assessments results in inconsistency with gifted identification. For example, we use inview, olsat, & MAP. We see a huge discrepancy in these assessments and therefore find it difficult to explain results to parents and serve the students we are identifying. I would like to see a change in the rules so that students must be identified through multiple measures similar to how we identify students for special education. We wouldn't label a child as learning disabled based on the results of one assessment. So why is it okay to label a student as gifted that way? It leads to unfair expectations for the student & confusion for the parent.	10/19/2015 6:45 PM
831	I am responding to the survey as a teacher who has worked with students ranging from children with significant cognitive disabilities to extremely gifted children. I also have 3 children who have been identified as gifted. 1. The fact that you are testing for gifted and accommodating for IEPs and 504s is a significant problem. My own son has been in classes with a child who is identified gifted and has a 504. This child is not only a distraction to the class (thus impeding on my own son's opportunities for growth - the teacher has to take time away from instruction to attend to the student's needs), but also this young man is struggling when he could be successful in a regular education classroom (this is due largely to the fact that his parents feel he should be with the gifted kids because the test scores prove it.) 2. The rules are far too vague for any parent to actually understand how the school will service their child.	10/19/2015 6:35 PM
832	I believe the process should be multifaceted with educator, parent and progress report along with specific testing.	10/19/2015 6:30 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

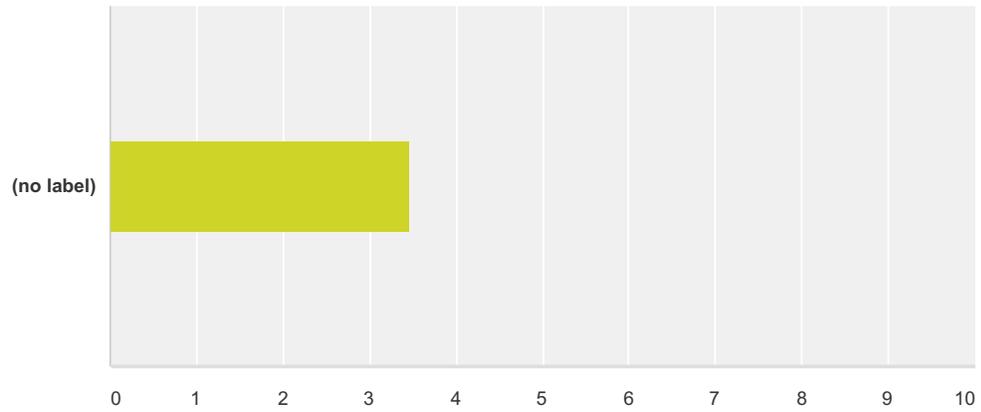
833	Do we need to make a new law for everything? The Republican Party used to be for local control and allowing the boards of education decide policy in each school district.	10/19/2015 6:30 PM
834	I think gifted identification is horseshit, but if you are going to do it--and we clearly have a huge gifted lobby in this state--then this clearly articulates what the district is supposed to do. At the very least I think it encourages identification of low income and minority kids--just the sort of kids that don't get identified because, let's face it, you are testing for privelege.	10/19/2015 6:26 PM
835	The language is not very clear as a difference between screening and testing.	10/19/2015 6:22 PM
836	Specific rules are not as relevant as how districts can meet those mandates--there are far too many limitations on what is and what is not able to be counted as "servicing" gifted students.	10/19/2015 6:06 PM
837	Remove whole grade screening in grade band 3-6 for cognitive testing. Remove whole grade screening in grade band k-3 and 3-6 for science and social studies testing.	10/19/2015 6:02 PM
838	If a parent or teacher requests identification, is testing guaranteed? Or, is there some approval process that must be met? For example, if a parent request testing, does a teacher need to concur that testing is needed also? Or, does the mere act of a parent request guarantee testing. Also -- which tests? One test? A battery of tests?	10/19/2015 6:01 PM
839	We already have more than enough testing going on with our students. To add this provision: In the areas of superior cognitive ability, math, reading, science and social studies, conduct yearly at least one whole grade screening in grade band K-3 and at least one whole grade screening in grade band 3-6 - would cause additional testing. I totally disagree with this. We need more instructional time and formative assessments with our students - not two whole grade screenings.	10/19/2015 5:57 PM
840	Any rule that obscures or excludes an individual from a program or service who may test comparably talented or gifted from receiving equal opportunity under the law shall be deemed invalid.	10/19/2015 5:55 PM
841	Yes, be sure to open up communication between school and parents and make schools accountable to both the community and the Ohio Department of Education in a much more thorough manner than what it has been.	10/19/2015 5:51 PM
842	No	10/19/2015 5:50 PM
843	Too many specific tests required and specific time frames.	10/19/2015 5:44 PM
844	I do not agree with the statement below: Districts must recognize scores from any test approved by the department of education for gifted identification. I use the MAP test for intervention grouping. MAP over identifies gifted students. Once identified, always identified is ridiculous especially in the early years. A young child who has nurturing parents is easily identified as gifted. I do not agree with the statement below: In the areas of superior cognitive ability, math, reading, science and social studies, conduct yearly at least one whole grade screening in grade band K-3 and at least one whole grade screening in grade band 3-6; This is not necessary and a waste of money. Students are not testing twice during their K-12 education to determine if they should be on an IEP, it is based on referrals. Parents, teachers, and students can refer for testing.	10/19/2015 5:41 PM
845	No matter what you write and how comprehensive it seems schools will use the excuse "our interpretation, or this is how we interpreted it" Schools have to accept outside testing. Why isn't that the case for special ed. students? Parma City Schools is already looking for loop holes they are bare minimum and all attitude-just like special ed.	10/19/2015 5:37 PM
846	I believe students need to be retested every couple years.	10/19/2015 5:34 PM
847	Do students need to be re-identified during a particular period, or once id'ed no further / later id needed... once gifted always gifted?	10/19/2015 5:34 PM
848	More specific parameters on what is required to support gifted students. Also more clearly defined opportunities.	10/19/2015 5:34 PM
849	I do not believe this is necessary - " In the areas of superior cognitive ability, math, reading, science and social studies, conduct yearly at least one whole grade screening in grade band K-3 and at least one whole grade screening in grade band 3-6;" Students can be referred by teacher, parent, self, I do not think whole grade testing twice in the students school years is necessary. It is also very expensive.	10/19/2015 5:32 PM
850	There is a lack of specificity for what constitutes gifted identification.	10/19/2015 5:29 PM
851	I have nothing to compare the proposed rules to; the changes from the current rules should be easily identifiable.	10/19/2015 5:24 PM
852	#3 Why test two times per year?	10/19/2015 5:24 PM
853	The State should provide funding for the additional testing... but that would be out of the question of course	10/19/2015 5:23 PM
854	The specific types of gifted identified should be clearly articulated as well as how or if specific groups will be served and what that looks like.	10/19/2015 5:20 PM
855	All gifted students should receive appropriate educational services.	10/19/2015 5:20 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

856	Do NOT use Terra Nova as a identifier.	10/19/2015 5:19 PM
857	How do you expect Districts to find the time, energy and resources to test children twice a year every year? And then after students are mandated for identification, there are typically no funds to provide services to those who qualify. That leaves us holding the bag when parents are angered and demand services that we cannot provide. We would like to, however, there are no funds.	10/19/2015 5:19 PM
858	Why limit only through sixth grade	10/19/2015 5:18 PM
859	The gifted indicator on the report card has resulted in too much game playing by districts. The identification for cognitively gifted is also NOT accurate--if a child scores in the 95%tile on ONE area (i.e. math) they are deemed to be cognitively gifted? They are not--they are gifted and/or talented in ONE area. That does not make them cognitively gifted. I am not sure where that interpretation came from, but it is just wrong. It does not accurately portray students and parents get very confused too.	10/19/2015 5:12 PM
860	Finding a test for k-2 grade band that adequately identifies in social studies and science is difficult. By identifying in all areas, small districts are being penalized when they can't service students in all academic content areas due to not enough funding for personnel or HQPD training for cluster grouping.	10/19/2015 5:09 PM
861	I would prefer to see the language say that districts are required to test 2 times in K-5 or possibly even 1 time K-3 and one time 4-8. The indicator is divided into K-3 and 4-8. It makes sense that the mandated testing and the indicator grade bands match.	10/19/2015 5:07 PM
862	Again over reaching intervention in local school business. Another unfunded mandate to set up the locals for the creation of separate corporate gifted entities.	10/19/2015 5:04 PM
863	no changes to recommend.	10/19/2015 5:04 PM
864	NO	10/19/2015 5:04 PM

Q7 The proposed rule provides flexibility in how districts may serve gifted students.

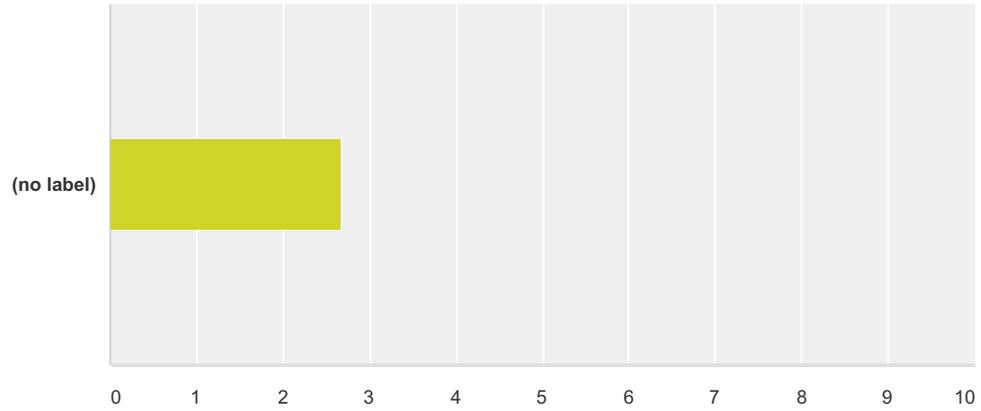
Answered: 1,986 Skipped: 1,476



	Strongly Disagree	Disagree	Neither Agree or Disagree	Agree	Strongly Agree	Total	Weighted Average
(no label)	7.10% 141	8.71% 173	24.12% 479	51.06% 1,014	9.01% 179	1,986	3.46

Q8 The proposed rule clearly describes standards for the quality and extent of gifted services.

Answered: 1,994 Skipped: 1,468



	Strongly Disagree	Disagree	Neither Agree or Disagree	Agree	Strongly Agree	Total	Weighted Average
(no label)	27.53% 549	19.21% 383	16.85% 336	31.80% 634	4.61% 92	1,994	2.67

Feedback Survey on Proposed Operating Standards for Gifted Education

Q9 Do you have specific changes for the proposed rule related to services?

Answered: 918 Skipped: 2,544

#	Responses	Date
1	Gifted services should be provided by highly qualified personnel such as a gifted intervention specialist or someone who has had special training to work with gifted students. Districts must be accountable to the state and their community by submitting a service plan that includes a minimum minutes of service requirement.	11/7/2015 4:50 PM
2	I fear that this clause in the proposed policy-- An educator who has met district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students, as well as assist in the gifted identification process. --will be used by some districts as an excuse to hire the cheapest person for the job, rather than one that has to meet more widely recognized standards.	11/7/2015 4:49 PM
3	Parents want depth not always acceleration in the teaching of subjects for gifted students	11/7/2015 4:46 PM
4	1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPS. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/7/2015 4:46 PM
5	Make language more specific regarding how much gifted services schools are required to provide. Gifted students need challenge on their curriculum throughout the day and not just for a few hours in a week. It's also better to have them in a separate classroom since differentiation in a classroom with vastly varying abilities doesn't really work.	11/7/2015 4:28 PM
6	Want to adopt recommendations of the OAGC	11/7/2015 4:09 PM
7	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPS. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/7/2015 3:51 PM
8	The proposed rule removes all standards of quality service . In order to ensure quality service, reinstate minimum service minutes for students and caseload limits from current operating standards; carefully define service and instructional settings as provided in the current standards; remove the provision that allows poorly or untrained general education teachers to provide service ;	11/7/2015 3:36 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

9	<p>Of course this proposed rule provides *flexibility* for districts! It abdicates state responsibility for children and lets the districts decide what qualifies as service--no matter how meager the "service" and lets districts determine who is qualified to serve the students. We already have a state system that determines who is qualified to serve this special population through the teacher licensure system. Districts do not get to determine that convenient personnel, who may have had no training whatsoever in serving gifted learners, are actually "qualified." *Flexibility* for districts should not be a higher goal than the well being of children. If districts accept gifted funds, they must use those funds to serve gifted students appropriately. It is crucial that students receive services in their area(s) of identification by a licensed Gifted Intervention Specialist. They need to have instruction in the amount of minutes in current operating standards for service to be of any substance. The caseload of the GIS has to be limited as in current standards so that s/he can deliver to each individual student the service commensurate with his extreme needs. You have to know that this is a recipe for "differentiation in the regular classroom," which almost never materializes to any minimally acceptable degree, no matter how good the intentions of the teacher. Besides, differentiation is a routine duty of a teacher; it is not a separate service. District administrators, almost all of them lacking extensive coursework in gifted service models, need enumerated clearly in the operating standards the legitimate service models from which they may choose--a strength of the current operating standards that should be maintained. It is imperative that qualifications from the current operating standards be maintained for Gifted Intervention Specialists, who should be the first-choice instructors of the gifted, and for gifted coordinators. Any regular classroom teacher allowed to provide service because it is an accelerated placement for the student must participate in on-going HQPD. WEPs, like IEPs, should include a parent signature and be written by qualified, licensed personnel, namely a GIS or gifted coordinator.</p>	11/7/2015 2:27 PM
10	<p>I would like to see Ohio work more diligently on making sure our gifted children are serviced by educators who are committed to gifted children and their special needs. Many gifted students not only have special learning needs, but also emotional and social needs that should be addressed. Staff who are working with gifted students should be aware of their special needs. There should be a required minimum level of services for students who are identified. My gifted child should be able to receive similar services no matter what school they attend in Ohio. I am concerned that the flexibility of this plan does not require a minimum standard of responsibility. Please be responsible to the students in Ohio, give a responsible minimum requirement that requires a rigorous course of study to all of Ohio's gifted students. They are likely to be tomorrows leaders. Don't forget, they will be determining standards for your assisted living facilities.</p>	11/7/2015 1:26 PM
11	<p>Yes. 1. Please reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and MORE CAREFULLY define service and instructional settings as provided in the current standards. 3. Remove the provision allowing general education teachers to provide service as they tend to be poorly or untrained in gifted education. 4. Reinstate gifted coordinator and Gifted intervention specialist qualifications (from current operating standards) for both districts and ESCs and ensure that all gifted educators are provided high quality professional development. 5. Increase the scope and depth of the WEP and attempt to require parent signatures. 6. A GC or GIS should collaborate on writing of WEPs. 7. Reinstate instruction time requirements for gifted intervention specialists (from current standards).</p>	11/7/2015 12:46 PM
12	<p>There is no quantification of how many hours the services are to be provided.</p>	11/7/2015 12:05 PM
13	<p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/7/2015 11:57 AM
14	<p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. 6. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/7/2015 11:57 AM
15	<p>The service requirements are too vague regarding how many hours students need to receive gifted education.</p>	11/7/2015 11:54 AM
16	<p>Services must be provided by a teacher who has a certificated gifted license. Services need to be delivered on a regularly scheduled basis aligned with a curricular map based upon student individual learning level.</p>	11/7/2015 10:38 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

17	There is no language that states a REQUIREMENT to address the needs of a gifted student. It says "where services are offered" - which means it's OPTIONAL to address these educational needs of gifted students. Other states create a IEP track for gifted students so that their special educational needs are REQUIRED to be met and addressed by a school and so they can have an opportunity to receive an appropriate education. Without a requirement to serve the needs of these students, identification is an empty promise.	11/7/2015 10:18 AM
18	1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPS. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/7/2015 9:50 AM
19	A classroom teacher providing gifted service should need to meet more specific criteria than solely what a district decides - what's the criteria/measure?	11/7/2015 9:39 AM
20	There is a lot of freedom within the text to have gifted services administered by any teacher the district sees fit. Gifted children require a teacher trained to address their specific needs.	11/7/2015 9:29 AM
21	What standards? What flexibility? The proposed draft sets no standards and fails to define service. Flexibility would be providing a range of options and settings while ensuring that each option met the definition of service. This rule must establish a definition of service and then describe a variety of options for meeting the standard. The existing rule provides a wide variety of options and settings.	11/7/2015 9:15 AM
22	To offer services, the new rules need to be clearly defined which they are not. Please use the current rules as a baseline, and they revise from there.	11/7/2015 8:50 AM
23	1. The district should not have the option to determine criteria for gifted staff - the state must set high standards for staff working with gifted students, and continue its proper role of certifying gifted staff. 2. The proposed law allows districts to totally water down the quality and extent of any gifted services they might be providing. Ohio can and should do better in mandating ways that gifted students will be challenged every day and receive the education that is geared to their cognitive level. This is fundamental for all students, including those who have special needs/developmental disabilities and the gifted.	11/7/2015 8:32 AM
24	It describes.... but... educators who teach gifted students should hold gifted certification. I have an MA in Gifted Studies and I hold National Board certification on top of a K-8 and gifted licensure. I feel very strongly, as an educator and parent of 3 gifted children, that this needs to be addressed. It should not be up to a district as to whom they will place into a teaching position for gifted services. That role should be filled by someone trained in gifted studies.	11/7/2015 7:31 AM
25	In order for students to receive appropriate instruction and instruction time, reinstate the minimum service minutes. Reinstate the current service and instructional settings, but go further and define these even more. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both school districts and ESCs. Require and ensure that all gifted instructors are provided and receive high quality professional development. Increase the scope and depth of the written education plan and require that a gifted coordinator or gifted intervention specialist collaborates on writing these plans. Reinstate the instruction time requirement for gifted intervention specialists from the current standards.	11/6/2015 11:25 PM
26	An educator that meets criteria must be changed to an educator certified to teach gifted students	11/6/2015 10:48 PM
27	Need to retain teachers who have trained specifically to teach gifted children.	11/6/2015 10:30 PM
28	As gifted students engage in the next level of education, in the workplace, or in the community, they will not be engaging in a "local" world, even if those localities lobby for "flexibility." The call for "flexibility" allows districts to gut gifted programs. In this proposed rule, with no standards for the instructor to student ratio, districts can pay lip service to offering services, while making class sizes so large that there is no differentiation or real instruction. Also, the localities are given so much discretion that the gifted instructors can have virtually no qualifications. The resulting level of gifted services that districts actually provide will be too divergent; some districts will choose to offer more meaningful services than others. Gifted students already are well aware that districts offer them far fewer learning opportunities and resources than students who fall within other identifiable categories. The proposed rule embraces flexibility so much that it encourages districts to offer the most diluted opportunities, all while the districts still espouse that they offer "gifted services."	11/6/2015 10:09 PM
29	The WEP process cannot eat away at a teacher's time to adequately plan a differentiated curriculum. Too much data collection! The more paper work you dump on educators, the less effective they are. Have you wondered why so many teachers are leaving the profession? It's beginning to feel like we need an IEP for every student!	11/6/2015 9:49 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

30	<p>The new standards allow no clear parameters for service therefore a student could be pulled for fifteen minutes a week and be counted as served. The standards also lack any clear qualifications for staffing or professional development therefore anyone could count as a service provider. This undermines the training of gifted professionals who have spent a great deal of time and energy learning to work with this unique population. While districts might choose to appropriately serve students with a Gifted Specialist they could also stretch that specialist to working in so many settings/classrooms that no student is properly served. In my experiences in several districts I have seen how a lack of parameters can be detrimental to gifted students and their learning and growth. When students are allowed to stagnate in sub par settings they are unable to meet their full potential. This is unfair for our best and our brightest students who should be celebrated as opposed to shunned. Other populations with unique needs are properly served; our gifted learners deserve this same respect by having clear consistent guidelines for services. With strong guidelines every school can be held accountable for truly moving these students and promoting their strong set of skills and talents.</p>	11/6/2015 9:21 PM
31	<p>Keep the current standards, with the addition of requiring school districts to serve gifted children, who are identified through standardized gifted identification tests. The proposed standards cut out 13 1/2 pages of guidelines for identifying and serving gifted students. Removing these specific details removes the accountability that districts need in order to make gifted education a priority for gifted students. Under the guise of "flexibility", school districts will have very little incentive to properly serve gifted students in ways that actually further their education, provide academic challenge, and attend to their social and emotional needs. How can you ensure quality gifted education when there are no qualifications and licenses for teachers responsible for gifted education, unless they are funded by the state? Under the proposed standards, school districts could designate a regular classroom teacher who has no experience or qualifications in gifted education to provide services to those students. This does a huge disservice to gifted students, since it is vital that their education be differentiated for their specific needs by a teacher who has received additional training to meet those needs, as well as understands the gifted child as a whole. Furthermore, "services" could be anything that a school district desires, with no regard to quality, effectiveness, or enrichment. Districts could also claim that they are serving students without actually doing so since anything they deem fit can be considered a service. If the district does not value gifted education, they can easily use the new broad standards as permission to cut true services from their curriculum. Also, without guidelines for what defines a "service", there is no way to measure the effectiveness of said service.</p>	11/6/2015 8:51 PM
32	<p>It does not include a student teacher ratio.</p>	11/6/2015 8:40 PM
33	<p>When a gifted specialist only visits the school once a week, they are not having enough time interacting with the student, plus the teachers and assistants. As a parent, I doubted my child's needs were met. Her class teacher occasionally gave her a printed activity to bring home. The teacher didn't want them returned, no grading, and I was left to convince my child there was a purpose to doing any of the work. I was active as a volunteer and recognized her class teacher was introducing advanced vocabulary and problem solving to the whole class regularly. When late in the year the test results arrived at home, the teacher was surprised how advanced my daughter tested. We need to have some evaluation process that involves verifying the student's needs are being met. The Gifted Specialist with the teacher should meet, discuss and write the IEP together with the parent, and later the student. As a parent getting a bland IEP where I may submit comments, I didn't trust anyone would bother to read comments, let alone include them; followup didn't involve the parent. Honestly there were times I thought my daughter brought home someone else's report card. The tests showed advanced beyond grade level but report card was all 3's ..met expectations. She has been super creative, expressive and gifted musically and artistically since age 2 and 3. The teachers couldn't pick up on this acknowledge her. Instead she was always lonely and afraid, feeling she didnt belong. Now I have a different child resenting me for her life.</p>	11/6/2015 8:17 PM
34	<p>Instead of "one or more" services, to ensure quality and extent of gifted services, declare "any and all available and applicable services" will be utilized to meet the needs of each student.</p>	11/6/2015 7:46 PM
35	<p>As the Gifted Director for our district I DO NOT support these new requirements in the Sept. 2015 Gifted Operating Standards Draft :(I ask that you reinstate them as in March 2008 or address the issues presented):</p> <ul style="list-style-type: none"> • Reinstate All quality definitions or criteria for service including service settings and the need for qualified gifted intervention specialists to provide service or support in regular classroom settings; This is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. • Add minimum service minutes for students to something reasonable. Yes, 225 or 240 minutes may have been too high for some districts, but it should not be less than a period 40-45 minutes minimum; (you could have some districts giving as little as 15 minutes and calling is service up to all day service, how can you determine effectiveness this way and make academic gains) • The reinstatement of caseload limits maximums (suggest 75 max per one GIS; (it needs to have a maximum or this could get to be more than any one person could handle 100+ to 1,000 plus students in large districts; districts may eliminate gifted teachers to just one person in large district with no caseload limits and again how can you measure effectiveness) • The reinstatement of qualification for gifted teachers; (no other special population is taught by untrained, not highly-qualified individuals with all the accountability measures in place for students to meet) unless this is an accelerated classroom • The reinstatement of WEP requirements. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 	11/6/2015 7:41 PM

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36	Independent study is an easy way out of educating a child. there has to be clarity on what gifted children should have accomplished thus ensuring that each gifted student has the same level of education regardless of the school	11/6/2015 5:57 PM
37	Flexibility is created at the expense of protection for the students who need, and benefit from, the gifted services. If anything, the standards by which gifted services are to be provided should be spelled out with more clarity, not more "flexibility" (which too often is code for "If we don't want to do it, there's nothing there to impel us to do so -- we're the local educators, and we decide what is best for the students we serve").	11/6/2015 5:54 PM
38	The districts determining who can serve and eliminating the role of a Gifted Intervention Specialist potentially eliminates all services. Every teacher could be deemed qualified to understand the unique needs of gifted learners. This would not happen on the other end of the spectrum of needs.	11/6/2015 5:54 PM
39	1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/6/2015 5:48 PM
40	Gifted Intervention Specialists should be required when gifted services are provided.	11/6/2015 5:45 PM
41	Please specify that instruction should be done by qualified gifted instructors, not general educators. Please set minimum time limits. My daughter was placed in an all gifted class last year. A mix of 4th and 5th grade, with a qualified teacher. It was life-changing for her. Also the WEPs are very generic and not worthwhile. They need to be more specific.	11/6/2015 5:36 PM
42	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/6/2015 5:22 PM
43	The rule doesn't state a timeline for reviewing and reporting...one district could review every year like an IEP and others could review once in elementary, once in middle, and once in high school. It should be consistent - either once a year like an IEP or every 3 years like an ETR.	11/6/2015 5:18 PM
44	this survey is confusing. I would like to have seen what exists today versus what would exist... VERY confusing. Not sure what the changes are!	11/6/2015 5:14 PM
45	This rule is so objective it should not be called a rule. Basically anyone could be a specialist. Any program can be considered a gifted program if it's meets a district's written goals. When is a WEP due each year? These programs are the lifeblood of Ohio's high achievers. Why are we ignoring them with empty requirements?	11/6/2015 5:12 PM
46	You cannot have quality services when there are no guidelines, contact minutes or other requirements. The following changes are unquestionably necessary: 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/6/2015 5:04 PM
47	There need to be HQT requirements for those who provide gifted services, not just any teacher deemed by the district as qualified. In this case, there is absolutely no guarantee that gifted students will be adequately served. We cannot afford to not offer these students the best possible teachers. There should also be requirements for what types of classrooms students can be served in, e.g. general ed., self-contained, pull-out, and guidance on the number of students that may be served in these classrooms.	11/6/2015 5:03 PM
48	This appears to be voluntary. The education should meet the students needs and if a student is advanced s/he should not be left to twiddle their thumbs because the law does not require and action once a student is deemed gifted.	11/6/2015 4:58 PM
49	There are no adequate standards regarding quality of services in the proposed rule.	11/6/2015 4:49 PM

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50	Teachers in gifted ed. should have specific training, and minimum service minutes should be specified.	11/6/2015 4:45 PM
51	I would like to see something more concrete on how a teacher/educator gets to work with gifted students. I understand you want to keep it broad for the individual districts to work that out, but I think there should be some state minimum qualifications.	11/6/2015 4:23 PM
52	The proposed rule needs more strict guidelines for service, including: Caseload limits Minute requirements Definitions of what service is Gifted staff qualifications, not left up to districts In an era where we require Highly Qualified educators in all subject areas, the gifted students need Highly Qualified educators, trained in gifted education Require more depth and rigor in the Written Education Plan and require parent signatures Require a GIS or gifted coordinator collaborate on the WEPs	11/6/2015 4:20 PM
53	It should stay as it was before	11/6/2015 4:20 PM
54	The experience I have had with my children was not positive.	11/6/2015 4:19 PM
55	Flexibility is not good. Giving districts too much flexibility will not hold them accountable to serve the gifted students in they way they need. If you want to eliminate gifted services, then go ahead and implement this change. The current rule gives parents and gifted programs a leg to stand on. Please do not change the current rule!	11/6/2015 4:10 PM
56	The proposed rule allows considerable flexibility for each district, but there is no clear definition of a gifted intervention specialist and what credentials a person must have to be considered a gifted intervention specialist according to the state.	11/6/2015 3:59 PM
57	It is difficult to answer the first question because there are not any standards for quality instruction left in the rule. And, the word "quality" and "extent" should be deleted from the second description, because the proposed rule offers NO quality and NO parameters or guidance for "extent". Not only are their absolutely no quality guidelines regarding the kinds of services. There are no "minimums" set for level of service nor time allowances, and one can't even decide if there need to be any services to these students at all based upon this wording. And, it seems when the State of Ohio is in the eye of the nation for essentially dumbing down the state testing requirements, it would appear to be logical that Ohio would not any and all gifted staff qualifications. The current qualifications standards are based on current state and national standards which have clearly defined and refined what are necessary qualifications for instructors. This does not include some "district-determined criteria" which could be non-existent. And, the bottom line (for anyone who is aware of the reality of the work of classroom teachers) is that the majority do not differentiate at all. They might like to, but the continued constraints promoted by a plethora of tests, makes such differentiation almost impossible to provide. No other group of students has been so subjected to total educational disenfranchisement than the gifted students. As students with clear and specific needs, they are entitled to clear and specific guidelines, like those in the current Code.	11/6/2015 3:53 PM
58	There is no description of the types of services to be provided. I feel there needs to be specific guidelines on what is acceptable for services.	11/6/2015 3:46 PM
59	Provide teachers/intervention specialists who trained to teach gifted students.	11/6/2015 3:36 PM
60	Again, whether or not the rule is clear does not mean that it is acceptable or desirable. The proposed flexibility is not desirable as history has shown that lack of accountability results in a negative outcome for the gifted student population. Only a licensed Gifted Intervention Specialist should be authorized to instruct and address the social and emotional needs of gifted children, not a general education teacher and not an intern.	11/6/2015 3:31 PM
61	The proposed rule does not specify what quality and extent of instruction would be required, therefore one cannot answer the first question.	11/6/2015 3:19 PM
62	1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/6/2015 3:19 PM
63	There should be follow up meetings on the WEP mid year incase there is a need to readjust goals.	11/6/2015 3:03 PM
64	Reinstate minimum service minutes for students from current operating standards along with caseload limits. The proposed draft has neither.	11/6/2015 2:51 PM

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65	<p>The proposed rule has removed the quality of services offered requiring a specified amount of time requirement for service as well as the high quality level of instruction gifted students should be receiving. When thinking about the quality and extent of gifts services... We should: 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and gifted intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/6/2015 2:46 PM
66	<p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/6/2015 2:39 PM
67	No	11/6/2015 2:28 PM
68	<p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits (without the sunset provisions) from the draft of the gifted operating standards approved by the State Board of Education Achievement Committee (11.11.13 draft). 2. Reinstate and improve service and instructional settings as provided in the current standards and adjusted to some extent in the 11.11.13 draft. 3. Remove the provision that untrained general education teachers provide service unless it is an accelerated classroom as outlined in the 11.11.13 draft. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Reinstate instruction time requirement for teachers from current standards. 5. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 6. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 7. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs.</p>	11/6/2015 2:27 PM
69	<p>This is already all over the board in the state and this would provide even more difference. We should be some ding districts that utilize a GIS not making their job unless by saying anyone with a teaching degree could do it. That would never happen with the opposite side of the spectrum, i.e. Special education. We need to pull back language that spells out what service is and states minimums for service minutes. Otherwise every district can say they served this students and not actually do so.</p>	11/6/2015 2:26 PM
70	<p>Cannot respond to first question as all standards of quality service have been removed. The proposed rule makes the gifted performance indicator into a useless tool if there are no parameters or qualifications for what is called "service" Reinstate service minutes, reinstate and define service and instructional settings Remove the part about untrained teachers providing service Maintain current operating standards (2008) guidelines for qualifications of coordinators and Gifted Intervention Specialists</p>	11/6/2015 2:23 PM
71	<p>It really is best for gifted students to be taught by specialists who have been properly trained, certified and experienced in working with such students, just like all other special needs students and their corresponding certified aides/teachers etc.</p>	11/6/2015 2:21 PM
72	Better define what qualifies a student for gifted services.	11/6/2015 2:19 PM

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73	<p>The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result dis-empowers parents and the general public to determine which districts are providing effective gifted services. I recommend the following: 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/6/2015 2:01 PM
74	<p>If low achieving readers get so many minutes per a day with specialized services, why don't our high achievers receive the same amount or more services?</p>	11/6/2015 1:38 PM
75	<p>This rule does not seem to require districts to provide any particular services at all. There ought to be some sort of mandatory minimum of services provided: at least one day/week, or a selection of options (full time gifted, acceleration, or compaction for example) which would be acceptable. With perhaps the last resort option of bussing to a different school system or community school which provides full gifted services.</p>	11/6/2015 1:31 PM
76	<p>The proposed rule obliterates all standards of quality service so it is impossible to answer this question. 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/6/2015 1:26 PM
77	<p>Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/6/2015 1:22 PM
78	<p>Flexibility is certainly evident in the proposed draft rule. Too much flexibility to be honest. It is already difficult to get districts to do what is right for students that I feel the open-endedness of what defines service will only further perpetuate the lack of fidelity in gifted programs.</p>	11/6/2015 1:09 PM
79	<p>The proposed rule is sorely lacking! There is no mention of including the parent's perspectives and deep knowledge of thier children in the development of the WEP or in how the child's learning needs will be met. This rule, as written, sets no accountability for the school. There is no requirement for the WEP to be developed in a transparent, child-centered and informed way. As written, this rule proposes weakly developed, minimalist planning for learning supports for students. Families of gifted students should have the same rights and role as parents of children identified with disabilities.</p>	11/6/2015 1:08 PM

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80	<p>1) The first question here is impossible to answer. This rule does not define services for gifted students. 2) Appropriate gifted services needs to be defined in terms of the required, specific qualifications of a gifted teacher, appropriate instructional settings and curricular options and the minimum time required to define gifted services. 3) There is no mention of acceleration as appropriate gifted service. Clearly research proves otherwise. 4) Remove the statement (b) that districts can determine which educators can provide gifted instruction. This clearly would not be in the best interest of students and is not in alignment with research. 5) Include a statement requiring districts to have a gifted coordinator with a gifted license before providing any gifted services to students as was in a previous revision of the rule.</p>	11/6/2015 1:05 PM
81	<p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPS. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/6/2015 12:46 PM
82	<p>1. Disagree - What rule? The rule for standards is *gone*. 2. Strongly disagree - this would allow for teachers without specialized training to teach my gifted children for as little as 15 minutes per week. Why bother? Oh, so that it *looks* like the state has standards. If you're going to eliminate the requirement that gifted teachers have specific criteria and training, why not let any teacher be the school nurse? Or let any teacher be a speech therapist? Or the school psychologist?</p>	11/6/2015 12:34 PM
83	<p>The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPS. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/6/2015 12:16 PM
84	<p>The teachers interacting with gifted children need to have the proper education and training. A minimum amount of instructional time needs to be spelled out, or we will have some schools not meeting adequate standards.</p>	11/6/2015 12:12 PM
85	<p>Gifted can cause too much curricular specificity. While it is great that my child is gifted, it should not be the factor in determining class placement.</p>	11/6/2015 11:55 AM
86	<p>Every district interprets. You need to send \$\$\$ so all students can be supported without concerns fro finances. .</p>	11/6/2015 11:55 AM
87	<p>1.Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2.Reinstate and more carefully define service and instructional settings as provided in the current standards. 3.Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4.Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5.Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPS. 6.Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/6/2015 11:45 AM

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88	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/6/2015 11:42 AM
89	Is the school held accountable for providing or not providing the gifted services ? Parents should have a say in the WEP and decision making	11/6/2015 11:40 AM
90	Gifted education services should be just as available as Special Education services. It seems gifted children are constantly overlooked and services are bare bones. Let's stop setting the gifted children and parents of gifted children to the back burner.	11/6/2015 11:35 AM
91	Flexibility is fine, but the standards need to be higher. The entire reason I chose a community school is that there were NO services in my local district for Kindergarten. My kid would NOT have been well served in a public school, and in fact in the community school has skipped first grade and is close to a double promotion for math in 2nd grade. Socially and emotionally I have no idea how that would have worked in a public school with no services required. Differentiation at EVERY grade level, the ability to be with other gifted students if the district has enough students, and, ideally, in-class work rather than a pull-out program should be the norm.	11/6/2015 11:34 AM
92	Again referring to the BOE Policy Statement of June, 2003. 1) school districts will offer a continuum of services based on learner need; 2) parents of gifted children will be true partners in their child's education. The proposed Rule ignores the Policy statement that, " Even with a full continuum of services most students who are gifted will need access to services outside the regular classroom, delivered by a trained specialist in gifted education. These intervention specialists and district coordinators make the system work 'from within' and can provide direct services to the students with the greatest needs. Their training and availability are critical." The task force recommended that all educators, including teachers, administrators, school counselors and psychologists and other support personnel have FORMAL training in meeting both the academic and the social emotional needs of gifted children. That has not happened, and the proposed rule sends the notion of its importance out the window. The proposed Rule eliminates all service setting descriptions, contact minutes and caseload requirements, and would allow districts to determine who is qualified to provide service to gifted children. Those provisions in the current rule should be part of the new rules! Without some standardization of what 'service' is, districts could claim anything as legal service -while not providing any meaningful educational adjustments. Again, from the Policy Statement, "Research indicates that gifted students who receive appropriate services benefit from 3 to 6 months of additional learning per year when compared to equally gifted peers who do not receive such services."	11/6/2015 11:26 AM
93	While there is flexibility in how districts meet the needs of gifted students, there will be no continuity across schools in how WELL the needs of gifted kids will be met. The underfunded, understaffed schools will likely provide lower quality services than a very well funded, well supported and well staffed school.	11/6/2015 11:25 AM
94	Basically not possible to really answer the first question above on service because it basically deleted all standards of quality service---things like caseloads, minimum levels of service, and the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit options to three and destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, even if it amounts to 15 minutes per week, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. Because of this, it needs to : 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/6/2015 11:24 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

95	Students should be allowed to grade elevate. Many schools say no even if the child is bored. An effort should be made to group gifted children together so they do not feel like they are completely alone. They need to be around academic equals to feel "normal" and safe enough to flourish.	11/6/2015 11:22 AM
96	Provisions should be in place to insure that services are effective for identified gifted students.	11/6/2015 11:19 AM
97	There is no defined minimum criteria for who shall teach gifted kids. This leaves it in the hands of the districts without setting standards for the district to follow. Yes, it's flexible, but it needs some structure. There is no requirement for parent and student input - simply that the plan be provided to parents. I do appreciate the clause around supporting the student's social and emotional needs. This is absent in the current structure.	11/6/2015 11:14 AM
98	Are the districts really accountable? I'm not sure a 2 hour workshop truly allows a teacher to be qualified to service gifted students.	11/6/2015 11:11 AM
99	It certainly provides flexibility and describes standards, however it goes too far in that direction. It is far to easy for schools to choose the low-end option and still fall within the letter of the law.	11/6/2015 11:00 AM
100	While this shows how districts MAY serve gifted students it takes away some of the specifics that are provided now. By removing specifics, I feel that it may cause our district to stop providing some of the things that they do now that have really helped my daughter. The cluster groups, self contained classroom groups, specific personnel that she has experienced since 5th grade helped her to thrive. Keeping my daughter challenged enough outside of these groups is something that has been difficult.	11/6/2015 10:59 AM
101	I am concerned about the quality of the training that a District representative might bring to the providers of service who are not trained in gifted education.	11/6/2015 10:59 AM
102	A gifted child is very different from the student population. A teacher who does not understand gifted students cannot meet their needs. Gifted students begin underachieving in 2nd grade without gifted services. What a waste of a brillians mind.	11/6/2015 10:47 AM
103	Nowhere does it seem to indicate that a school district must provide services to all children, of all ages, that are determined to be gifted. It seems to state that "where services are available," which leaves schools left to not provide services, as many currently balk at doing.	11/6/2015 10:46 AM
104	No real definition of quality service to our gifted children. Reinstate minimum service- minutes, caseload, endorsement of educator needed Teachers who work with gifted students must have endorsement and training, coordinators must have proper endorsement Collaborative WEPs are the key to success- teacher, parent, coordinator	11/6/2015 10:41 AM
105	No quality standard is described. How does one evaluate an "effective instructional practice"? What should "district-determined criteria" for an educator who is not a gifted intervention specialist include -- years of experience? specific coursework? a certain number of hours toward gifted intervention certification? any of these? all of these?	11/6/2015 10:39 AM
106	1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/6/2015 10:34 AM
107	Reinstate minimum service minutes from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordiantor and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instrutors are provided high quality professional development.	11/6/2015 10:29 AM
108	There should be mandates of time requirements.	11/6/2015 10:28 AM
109	(C)(1) change to "All gifted services shall be reported to the department..." (C)(1)(c) change *may* to *shall*: " Curriculum shall..."	11/6/2015 10:26 AM
110	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/6/2015 10:26 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

111	Many schools over only a few hours of gifted enrichment—not enough to serve anyone's needs. Gifted children need to be in gifted classrooms.	11/6/2015 10:14 AM
112	<p>1.Reinstate minimum service minutes for students from current operating standards along with caseload limits.</p> <p>2.Reinstate and more carefully define service and instructional settings as provided in the current standards.</p> <p>3.Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4.Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development.</p> <p>5.Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6.Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/6/2015 10:13 AM
113	<p>Reinstate minimum service minutes for students from current operating standards along with caseload limits (without the sunset provisions) from the draft of the gifted operating standards approved by the State Board of Education Achievement Committee (11.11.13 draft). 2. Reinstate and improve service and instructional settings as provided in the current standards and adjusted to some extent in the 11.11.13 draft. 3. Remove the provision that untrained general education teachers provide service unless it is an accelerated classroom as outlined in the 11.11.13 draft. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC). 6. Reinstate instruction time requirement for teachers from current standards. 7. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 8. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 9. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 10. Revise whole grade testing from K - 3 to K - 2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that is required in ORC and which exists in the current operating standards. 11. With the reinstatement of service parameters as described above, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 12. Reinstate the district service plan as required by ORC. 13. Reinstate identification and service definitions as outlined in current operating standards 3301 - 51 - 15 and adjusted to some extent in the 11.11.13 draft.</p>	11/6/2015 10:05 AM
114	<p>Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/6/2015 9:56 AM
115	<p>What is service? How will a district know what quality service is for gifted students without defined guidelines? Who will be the specialist for gifted students? Districts are already understaffed with gifted expertise. This population of students deserve to have specialists with a solid foundation in gifted education.</p>	11/6/2015 9:47 AM
116	<p>I do NOT like the idea of simply putting gifted high school students into college classes and calling that an acceptable offering that provides gifted services. It does NOT. Simply being a college class does not mean that it is taught at a gifted level. Nor is it adequate to toss children over a wall to a college because they are gifted without any orientation to college and how it is run. THIS is PRECISELY how my district is currently failing it's gifted high school students. All you have done is codify something that DOES NOT WORK. You don't seem to understand what "gifted" truly means or even have a basic sense of how to provide for children who are gifted. May I suggest reading up a bit in the area? James R. Delisle has been working with gifted children for many years now. Perhaps you should either consult with him or read one of his many books in the area or watch some of his videos on youtube.</p>	11/6/2015 9:36 AM
117	<p>There needs to be the amount of time needed to be stated as service. Without this statement of accountability, districts will report students served even if it is once a week in afternoon enrichment club.</p>	11/6/2015 9:36 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

118	1.Reinstate minimum service minutes for students from current operating standards along with caseload limits (without the sunset provisions) from the draft of the gifted operating standards approved by the State Board of Education Achievement Committee (11.11.13 draft). 2. Reinstate and improve service and instructional settings as provided in the current standards and adjusted to some extent in the 11.11.13 draft. 3. Remove the provision that untrained general education teachers provide service unless it is an accelerated classroom as outlined in the 11.11.13 draft. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Reinstate instruction time requirement for teachers from current standards	11/6/2015 9:21 AM
119	Establish at a minimum what a district should do to serve gifted kids. These kids have special needs that are often neglected. There are such specific guidelines with kids on the other end of the spectrum (developmental disabilities) but not gifted children who often have various social and developmental issues as well. Many teachers don't understand gifted children and how they learn which may be very different from mainstream children. There just seems to be in general a complete lack of awareness of this group of kids, their needs, and how to best educate them. It seems in many cases if the district is not required to do anything specific with these kids they don't and often gifted services are the first to be cut when budgets are tight. Why????? These kids are tomorrow's future, but only if they get the proper education and guidance they need. There are so many stereotypes about gifted children and that they are just smart so they don't need any special help. That is the furthest from the truth for many of them. I would like to see a gifted specialist be part of the department of education the could provide insight on these kids and how important it is to make sure they are getting specialized services.	11/6/2015 9:15 AM
120	Services should be increased, not written in a way where they might be decreased or administered by those who don't have experience in educating gifted students.	11/6/2015 9:03 AM
121	I believe that gifted students should be taught by gifted coordinators/teachers no matter what.	11/6/2015 8:45 AM
122	Yes, I do have specific changes for the proposed rule related to services.	11/6/2015 8:44 AM
123	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/6/2015 8:36 AM
124	1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/6/2015 8:29 AM
125	Reinstate minimum service minutes for gifted students from the current operating standards along with caseload limits from the 11.11.13 draft passed by the State Board of Education Achievement Committee (11.11.13 draft) without the sunset clause.	11/6/2015 8:19 AM
126	Minimum standards for services, duration, and providers of the gifted services are not specified. This can only lead to disparate services in different districts and nothing prevents a district from setting the bar so low that the services are essentially meaningless and the students would suffer	11/6/2015 8:06 AM
127	The administration in school districts will continue to believe that they do not have to spend money on worthwhile programs for their gifted students. This is a travesty.	11/6/2015 7:45 AM
128	Keep rules as is.	11/6/2015 7:24 AM
129	Keep old language it was more descriptive and helpful	11/6/2015 6:42 AM
130	We lack quality today in gifted services. Although we are grateful the districts have set forth opportunities, limited, there are still students who lack the education they need for their day to day instruction. How is this determined "All district students who meet the written criteria for a gifted service...." This statement is general and does not provide guidelines detailed for a determination to be made.	11/6/2015 6:21 AM
131	Currently, our district has 1 qualified Gifted Intervention Specialists who oversees the ENTIRE district. The classroom teachers instructing our gifted students do not have more than one gifted class completed, if any at all. We pulled our daughter from the program because of this. Districts MUST be held accountable and MUST provide CERTIFIED teachers w gifted endorsements for day to day interactions.	11/6/2015 6:14 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

132	Did I miss something in the standards that gifted students should be serviced by a teacher trained in, endorsed to teach, or certified in gifted education?	11/6/2015 6:00 AM
133	<p>The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services.</p> <p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPS. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/6/2015 12:11 AM
134	<p>Teachers should be required to have a license specific to gifted ed. Gifted students should be serviced within their school. School districts should be held accountable for the education of their gifted students by data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Funding for gifted services should not be cut or spent on other services.</p>	11/5/2015 11:46 PM
135	<p>I think that district leaders need help in understanding that the detail necessary to make a WEP valuable and, for that matter, provide gifted education takes thoughtful preparation and expertise. I just received a very vague WEP that is nearly meaningless. The goals described are so vague that they would apply to any student. Here is an example: "Use creative and critical thinking skills for problem solving" - I believe that is called school.</p>	11/5/2015 10:53 PM
136	<p>Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPS. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/5/2015 10:28 PM
137	<p>Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPS. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/5/2015 10:21 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

138	<p>The proposed rule obliterates all standards of quality service so it is impossible to answer this question. The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/5/2015 10:11 PM
139	<p>I don't feel that these survey questions address the right issues. The wording is clear, yes, but I strongly disagree with this proposed change. I strongly disagree with someone who is not certified as a gifted intervention specialist providing services for gifted learners. This proposed change eliminates a standard of service for gifted learners. I'm extremely disappointed at the lack of consideration being given to this very vulnerable population through this proposed change.</p>	11/5/2015 10:05 PM
140	<p>I believe in allowing districts flexibility in providing services for their gifted students. However, these classes should be taught by certified gifted teachers who have specialized skills related to working with gifted students who unique learning needs.</p>	11/5/2015 9:54 PM
141	<p>This rule provides districts with a license to completely decrease and eliminate services for gifted students. Gifted students are already under served and this rule suggests a licensed specialist isn't even necessary?! Unbelievable! In NO WAY does this rule advocate for the population it pretends to represent.</p>	11/5/2015 9:43 PM
142	<p>Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/5/2015 9:29 PM
143	<p>Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/5/2015 9:22 PM
144	<p>The proposed changes have no quality of service for gifted students. Removing the requirement for a licensed specialist will inevitably decrease the quality of service. It is unbelievable to think the Ohio Department of Education does not realize gifted students need the instruction of someone specifically trained in differentiation, understanding social/emotional needs, and dual exceptionality. Also, to include no regulation of time for service is ridiculous. This would allow districts to severely cut services for a population that is already underserved.</p>	11/5/2015 9:18 PM
145	<p>Reinstate minimum service minutes for gifted students from the current operating standards along with caseload limits from the 11.11.13 draft passed by the State Board of Education Achievement Committee (11.11.13 draft) without the sunset clause.</p>	11/5/2015 9:11 PM
146	<p>Please eliminate the option to use 'district-determined criteria' to qualify an educator to provide gifted services. Gifted services should be provided by educators who meet state standards, in keeping with our use of state licensure for educators in general. The determination of qualifications should not exist at the district level. I would support the option for a district to petition for an exemption on an educator-by-educator basis.</p>	11/5/2015 9:09 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

147	Vague. Does the plan address how to accommodate for twice exceptional students?	11/5/2015 9:08 PM
148	Need caseload limits (but not minute requirements, as an appropriate caseload would eliminate the need for regulated minutes). Need defined service w/ instructional settings - but there needs to be some flexibility in combining multiple settings to provide service. Gifted teachers MUST be trained Gifted Intervention Specialists. Gifted students need to be involved in a program with instructional leadership provided by a Gifted Coordinator who is trained in Gifted Education.	11/5/2015 8:59 PM
149	I have serious concerns about letting the district decide who is qualified to teach gifted students. Shouldn't there be some qualifications required?	11/5/2015 8:42 PM
150	Remove the notion that district-determined criteria will be sufficient to designate someone as a service provider. This cheapens the understanding that gifted students are exceptional students whose needs are such that they should be addressed by someone with specialized training. There is a reason that there are special licenses to credential educators to work with gifted students- they have specialized training, as do specialists who work with students with disabilities and English language learners. Yes, there are wonderful teachers out there who know how to differentiate, but to allow districts to have full discretion to code someone as "qualified" with no criteria, qualifications, standards of measure, or other is inconceivable. Clearly, as districts are already cutting programs and fudging WEPs and services in order to grab "points", if they have the choice to hire a trained and qualified specialist or to simply bless a teacher, our children will lose at the hands of hopefully at least well-meaning teachers who have no idea what to do with them and as the concept of "gifted services" becomes just more muddy water. Add SOME criteria for defining "service", or we will return to the days of fly-by 15-minutes-per-week "services", or nothing more than occasionally giving leveled reading books and calling it "service". Do the authors of this draft so undervalue the intellectual and affective needs of gifted students and their incredible capacities for amazing thought and creativity when nurtured, that it is ok to encourage districts to say "we have a good teacher who did some differentiation" and call that service? Really? Would this fly in other areas of special needs students? This is horrifying. I can't imagine why ALL of the description was removed.	11/5/2015 5:31 PM
151	Leave the funding, staff, and opportunities available for the gifted students. Spend the time, manpower, and funds this movement has cost everyone on more pressing matters: how about figuring out what test is best for all Ohio students to take? Note, test was not plural. Too much of our students time is WASTED on preparing for tests that do not count towards anything. All of the mandatory testing is not a true reflection of what our children know, are learning, nor does it reflect what the children need to know in order to become successful adults. Let the teachers teach the material the students need and go back to one big test a year. More tests do not equal better students!	11/5/2015 4:50 PM
152	This portion goes too far and simultaneously not far enough. I think it is too much of a stretch to give students the ability to go to gifted classes and mentorship/internship programs. As an option, that's great. As a rule, it feels to constrictive for every district. There isn't enough structure as to the implementation and quality of the services. These kids are asking our most valuable resources for development for changing and improving the world. Why do they receive less dollar to dollar enrichment and educational support than the children who are at the opposite end of the IQ spectrum? Gifted children can become mastermind criminals without proper guidance and educational support. I've personally witnessed it.	11/5/2015 4:41 PM
153	Specify the training educators must have if they are not certified gifted interventionists. Specify that an "enrichment/intervention period" is not serving students throughout the day. Specify that students who are gifted are gifted throughout the day and needs must be met throughout the day.	11/5/2015 4:24 PM
154	Problem with "Services shall be provided by one or more of the following:" Our small district does not have qualified staff at secondary level to cover all of our gifted students. HS gifted students should be able to be served by College Career Plus and honor curriculum. If this policy stays in place our Elementary program will become weaker as we use one qualified individual to cover all grades.	11/5/2015 4:07 PM
155	I am concerned that the proposed rule no longer requires a certified gifted specialist to work with gifted students. That would be like removing special education teachers in favor of having the general education teacher provide the special education service. The typical gifted child has at least an IQ of 130 or greater which is 2 standard deviations above the average child. A special education child is at the opposite end of the spectrum which could be 2 standard deviations below the average. Both children have unique needs requiring teachers with knowledge and skills needed to meet their needs. To assume that a general education teacher can gain that expertise through professional development is unfair to the general education teacher and the gifted child. Gifted children deserve the right to have teachers that are knowledgeable and uniquely qualified to meet their needs.	11/5/2015 4:02 PM
156	A qualified educator of the gifted should not be determined by each individual district. The educator needs to be a certified gifted teacher.	11/5/2015 3:56 PM
157	I believe this is still too open ended and does not provide enough reference to oversight of these programs. Frankly, I don't trust them to be implemented effectively or genuinely based on these guidelines.	11/5/2015 3:46 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

158	I don't feel that it describes the amount of time the students would be able to interact in the gifted program. There are also significantly less options overall for the students. I believe there needs to be more verbiage and specifics on how the teachers, their qualifications, and class time will be handled.	11/5/2015 3:43 PM
159	No	11/5/2015 3:38 PM
160	The proposed rule practically eliminates all quality standards for staff qualifications and services provided. I recommend: - Reinstate minimum service minutes - Remove the provision allowing general education teachers to provide service unless it's an accelerated classroom. - Reinstate gifted educator and coordinator standards. - Increase scope and depth of WEP and require that a gifted staff member collaborate on the writing of it. - Reinstate instruction time requirement for gifted specialists from current standards.	11/5/2015 2:45 PM
161	If by "flexibility" you mean any district can decide what (if any) qualifications are needed to teach gifted students, then maybe.....My experience has been that sometimes there are very smart children who don't necessarily flourish in the traditional classroom. Some children, including mine, "dumb down" so as not to appear too smart in the classroom because they get teased about it. The gifted class pull-out times allow my kids to be themselves, to guess and challenge and learn without feeling like they have to hide how smart they are. Without some basic guidelines (e.g. "students must receive x hours a week in one or more of the following settings"), what stops a district from saying the homeroom teacher can put a kid in a corner with a book for 15 minutes and count that as gifted instruction? Also, this sentence is meaningless: " All district students who meet the written criteria for a gifted service shall be provided an equal opportunity to receive that service"...an opportunity to receive something is not the same as receiving it.	11/5/2015 2:44 PM
162	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/5/2015 2:36 PM
163	I want to know exactly what the plan is to challenge my gifted student. I want her to be doing more then her regular class.	11/5/2015 2:35 PM
164	How: The proposed rules obliterates all standards of quality service so it is impossible to answer this question. Recommendations 1.) Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2.) Reinstate and more carefully define service and instructional settings as provided in the current standards. 3.) Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4.) Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts as ESCs and ensure that all gifted instructors are provided high quality professional development. 5.) Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate with the writing of WEPs. 6.) Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/5/2015 2:22 PM
165	Where are the state/national licensure requirements for gifted staff? What happened to the variety of service options? Why is ODE bothering with standards if these important decisions will be left up to the district?	11/5/2015 1:35 PM
166	At a minimum my family supports the old rules. My family supports the Ohio Gifted Association's proposed standards. Lack of requirement for licensed instructors is unacceptable to my family. The proposed rules do not give me assurance that my child will receive services that meet her needs and help her to reach her potential. The proposed rules do not give me assurance that Ohio children will receive the services they need so that Ohio's great potential can be reached.	11/5/2015 1:35 PM
167	the standards while being flexible are also vague even when services are provided there is a gap in the accountability and ongoing modifications done	11/5/2015 12:44 PM
168	The proposed rules ELIMINATE all quality parameters for service. You are proposing to drastically decrease the present 22 EMIS codes which offer a wide variety of service options for gifted students down to a measly 3 options. This will inevitably destroy any and all ability to determine which services are most effective. The mere thought that services can be as little as 15 minutes a week and further compounded by a GENERAL education teacher without any gifted training is IRREPREHENSIBLE! Additionally, lowering gifted staff qualifications to "district-determined criteria" in lieu of national and state licensure standards is outright SHAMEFUL and a dire disservice to our children. Why does the ODE deem this favorable when such is not allowed for any other student population. The ODE should reinstate minimum service minutes from current operating standards along with caseload limits. This will only disempower parents and students.	11/5/2015 12:17 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

169	Restore the criteria for quality of services for gifted students in the current rule (D), including types of gifted service options, caseload limits, minimum staffing, minutes of instruction, instructional settings, qualifications of service providers (E), responsibilities of an intervention specialist and coordinator, and guidance services. The proposed rule focuses on providing school districts with more flexibility rather than setting high quality standards to improve the quality of gifted services and the achievement of students who are gifted. Many of the provisions removed from these sections clarified the law by providing examples of best practices to create the optimal conditions for serving gifted students, including social and emotional supports. It has also come to our attention that in some school districts principals and other administrators have been assigned to coordinate gifted services, adding to their responsibilities, and raising questions about their capacity to adequately support gifted education programs and students in addition to meeting all of their other duties.	11/5/2015 12:09 PM
170	Standards should be same across all districts at all levels. Provider standards should also be same across all districts at all levels. Measurements should be same across all districts at all levels. Kids in public school should be able to go to any public school and get educated according to their ability whether gifted or not.	11/5/2015 11:57 AM
171	District-determined criteria for gifted service providers is unclear and may result in a lax approach to service. Districts may assign teachers untrained in gifted education to provide services that may not meet the needs of those students who may be clustered in a classroom. Providers should be those individuals who have received a gifted, talented and creative endorsement. By obtaining such an endorsement, providers will have the skills and training necessary for meeting the diverse academic and social/emotional needs of students identified with such gifts and talents.	11/5/2015 10:38 AM
172	District determined criteria for gifted services and providers does not provide a strong criteria to ensure that the services are meeting the needs of gifted students. This language would allow districts to place professionals with no training or experience with gifted children as gifted service providers.	11/5/2015 10:38 AM
173	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	11/5/2015 10:13 AM
174	How are districts going to determine the criteria for teachers who have no gifted experience, yet should be working with gifted children? Gifted children are unique and have a unique set of social/emotional as well as academic needs. You would never say that a child 2 standard deviations below the mean could have all of their social/emotional and academic needs met by the same teacher who is teaching the "average" students in the room, plus the expert in gifted education. Instead, the state sets strict guidelines on the coursework for teachers to work with these students as well as strict limits to class size. Therefore, what is the difference if the students is 2SD above or below the mean of a bell curve? They still are 2SD away from "average" yet they have very different needs. Gifted kids deserve the opportunity to develop their strengths, gifts and talents and they need a certified instructor who has been trained to work with these students, as well as their classroom teachers to meet their needs throughout the day. Gifted students also deserve a set time during the day with be with their like minded peers. They need that time to collaborate with students who are more like themselves. Again, we do this for the students who are on the other side of "average" yet we ignore this for the gifted? I fail to see how limiting our best and brightest will yield the inventors, the doctors, the world changers of the next generation if we continue to take away services and resources for them that will push them to be better than they were yesterday. CHANGE- Gifted students MUST work with a gifted intervention specialist (one who has taken coursework and earned a gifted license to work with these children) on a regular basis.	11/5/2015 7:36 AM
175	This portion of the proposed rule sounds so generic that I, as a parent, could almost make a plan and implement it. With no formal training in education whatsoever. Yes, there is flexibility, but this has really gone too far to the other end of the "flexibility spectrum".	11/5/2015 7:08 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

176	<p>The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPS. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/5/2015 7:02 AM
177	<p>Criteria for how a child is considered gifted should be black and white. Currently there are so many loopholes, some students get in the program and some don't but parents don't understand the specific criteria.</p>	11/5/2015 7:00 AM
178	<p>You are supporting the loss of a specialized teacher for this area. While not completely removed, it provides that option. Schools are not allowed to do this with kids at the other end of the spectrum. You either believe this is a group of students worthy of development or you can continue to support just one or two groups.</p>	11/5/2015 6:08 AM
179	<p>A WEP should be as meaningful as an IEP with legally binding annual review dates.</p>	11/5/2015 5:24 AM
180	<p>Quality is subjective. It is easy to state something is "quality". This description must be more specific.</p>	11/4/2015 10:41 PM
181	<p>Reinstate minimum service minutes for students from current operating standards along with caseload limits (without the sunset provisions) from the draft of the gifted operating standards approved by the State Board of Education Achievement Committee (11.11.13 draft). Reinstate and improve service and instructional settings as provided in the current standards and adjusted to some extent in the 11.11.13 draft. Remove the provision that untrained general education teachers provide service unless it is an accelerated classroom as outlined in the 11.11.13 draft. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Reinstate instruction time requirement for teachers from current standards. . With the reinstatement of service parameters as described above, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC. Reinstate identification and service definitions as outlined in current operating standards 3301-51-15 and adjusted to some extent in the 11.11.13 draft.</p>	11/4/2015 10:29 PM
182	<p>1) Reinstate from the current standards the instruction time requirement for GIS. 2) Reinstate from current standards the minimum service time for students along with caseload limits. 3) Reinstate GIS and Gifted Coordinator qualifications from current standards. Do this for both districts and ESCs. 4) Eliminate the provision that allows untrained (or poorly trained) general education teachers to provide service unless it is as an accelerated classroom. 5) Increase both the depth and scope of the Written Education Plan (WEP) and require that a GIS or Gifted Coordinator collaborate on the writing of the WEP. 6) Reinstate and better define "service" and "instructional settings" as provided in the current standards.</p>	11/4/2015 10:17 PM
183	<p>C 1 (c) Remove this point. Telling districts they "may" gives districts the impression they can ONLY do what ODE says they "may." This is not a dictatorship where permission must be granted to do anything and everything. 3) Always requiring an WEP is an unnecessary, cumbersome burden and expense for districts and teachers. For example, in our district every AP instructor fills out, prints, signs and mails multi-page form with for every student in his/her class to every parent. It contains nothing but a re-write of the course description and gobbly gook. Our family just throws them in the trash. It is a total waste of time and money. Most parents of gifted students and the gifted students themselves are beyond this sort of bureaucratic paper shuffling.</p>	11/4/2015 10:12 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

184	<p>In accordance with the OAGC recommendations, the Department of Ed. should Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPS. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/4/2015 9:35 PM
185	<p>The proposed language in this section gives woefully inadequate guidance and totally guts responsible gifted services. There are no standards or definitions of what acceptable service is, and would allow districts to report a student served when there is no defined contact time, no caseload limits, no described settings, no meaningful differentiated instruction, weakens the WEP process, and requires no staff with gifted licensure. How can the effectiveness of gifted services be measured when there are no standards except anything goes!?" Reinstate 1) minimum minutes, 2) defined service settings, 3) instructional time and caseload requirements for gifted intervention specialists, 4) WEP language in current rule and strengthen is by requiring attempts to gain parent signatures, and 5) language that describes the responsibilities of gifted coordinators.</p>	11/4/2015 9:33 PM
186	<p>The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPS. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/4/2015 9:00 PM
187	<p>You must have a teacher who has gifted certification providing the gifted services. A traditional teaching degree does not provide the necessary knowledge and guidance to teach truly gifted children (above 130 IQ). I have experienced firsthand and have watched my children experience multiple, well-meaning, exceptional teachers (who were not gifted certified) mishandle how to proceed with a gifted child. They are not trained to recognize true giftedness vs. an intelligent/diligent child (and there is a difference) nor do they receive sufficient training to properly challenge and fulfill a gifted child's potential. These children are as far from the "normal" scale as a child with an IQ of 70 is. The gifted deserve respect and support. They require a special education with a gifted certified instructor. Regulations need to ensure this. Also, why do we require schools to identify gifted children, but do not require gifted services? This makes little sense and gives districts the ability to ignore providing special education to these children. Make Ohio a model of excellence; require schools to provide gifted programming with a certified gifted teacher. These kids are 3 deviations from the mean. Research has proven that many will get lost in the shuffle if they are not challenged, stimulated, and valued.</p>	11/4/2015 8:56 PM
188	<p>The services provided to gifted students needs to be provided at a high level and by qualified trained staff. Just like you wouldn't ask someone who has never even played a sport to try to train and coach the best and talented of athletes.</p>	11/4/2015 8:31 PM
189	<p>In accordance with the Ohio Association for Gifted Children recommendations, I think the Department of Ed. should: Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPS. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/4/2015 8:17 PM
190	<p>Please specify that teachers have specific training in gifted education.</p>	11/4/2015 8:13 PM
191	<p>this is still test based, it must be more objective than that</p>	11/4/2015 8:08 PM
192	<p>Right now I only see EPP for math / my son is gifted in ELA but has no cluster group or nothing special like the math kids do.</p>	11/4/2015 7:46 PM
193	<p>Can subjective information be included in the identification process, such as a questionnaire completed by the classroom teacher?</p>	11/4/2015 7:44 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

194	<p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/4/2015 7:43 PM
195	<p>This is written too broad and leads too much open for interpretation.</p>	11/4/2015 7:26 PM
196	<p>Flexibility is not necessarily a good thing, especially when there is no accountability for the District. When deciding who will teach my child, I do not want district defined criteria as the decision maker. That might be the best for the District (cheapest, easiest) but not for my child. It is paramount that a specially trained gifted intervention specialist teach my child. It is a shame that our most promising learners are not guaranteed the learning experience they need and deserve. These children are our future and we are not setting them up for success. Gifted learners are bored when not challenged and can turn their brilliant minds off from school because they are not being engaged. If they didn't speak English, they would be guaranteed the special attention they need. If they struggled to read, they would be guaranteed the assistance they need. Doesn't my child deserve the same? Every parent should be guaranteed that their child will be given the education that child deserves. This absolutely should include gifted children. We cannot tempt Districts to cut these programs when levies do not pass. Can we cut English as a second language or IEP programs? No. So why is it ok to leave my child's education on the chopping block?!</p>	11/4/2015 7:07 PM
197	<p>There is too much flexibility in the wording. A clear connection to a school's report card is needed to give districts an incentive to do more than the minimum. Extensive programs are available for remedial kids...the bottom 1%. There are very few options for gifted kids. Too much focus on testing and not enough on excellence for advances kids.</p>	11/4/2015 6:44 PM
198	<p>Again... Not specific enough and should have state mandates minimums</p>	11/4/2015 6:08 PM
199	<p>It guides how districts MAY serve gifted students. It needs to change "may" to "shall". Districts should serve gifted as completely as they serve special needs.</p>	11/4/2015 5:34 PM
200	<p>It is not specific enough. We have a two gifted students currently, one in a self contained unit and one in a typical classroom setting. None of the Teachers, Administrator's, or program Directors can really provide us with details on their education plans. They identify that they are gifted and have needs but not how they are attempting to meet those needs. This is like an afterthought for our District. An assumption of no harm done if we don't do anything because they are ahead of where other kids their age are. Wasted talents.</p>	11/4/2015 5:25 PM
201	<p>A qualified educator of the gifted should NOT be determined by each individual district. The educator must be a certified Gifted Intervention Specialist.</p>	11/4/2015 4:59 PM
202	<p>As there are certifications for working with gifted students, individuals with that certification should be required to teach the students. Just as teachers with certification are expected to teach special needs students.</p>	11/4/2015 4:35 PM
203	<p>Parents of potential gifted children need clear and specific guidelines for the gifted services to know how the gifted services are beneficial to the children and to compare ours to other states' gifted services. The proposed rules are overall too general to provide potential miscommunication.</p>	11/4/2015 4:31 PM
204	<p>The proposed rule does provide for flexibility, which is good for schools. However, districts need a more specific explanation of services. The list given in your legal requirements summary needs to be stated specifically in the standards. It is a concern that a district can claim to serve gifted students without having any qualified licensed gifted endorsed professional working in their district.</p>	11/4/2015 4:30 PM
205	<p>Include a minimum number of service minutes. Include services should be provided only by a licensed gifted teacher to maintain quality of gifted education who is provided with professional development opportunities. Education plans should be signed by a parent and be written in coordination with the gifted teacher.</p>	11/4/2015 3:26 PM
206	<p>Gifted students should be served by an educator that is licensed as a gifted intervention specialist.</p>	11/4/2015 3:23 PM
207	<p>Services need to have a qualified educator who has an accredited degree from a reputable University in gifted and talented services. The training and coursework required to attain this degree is significant and vital to the service of gifted and talented students. I am appalled that the following is proposed: STRONGLY DISAGREE THAT THIS IS OKAY: An educator who has met district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students, as well as assist in the gifted identification process. An individual with specialized skills required to implement the student's gifted service where the service includes an internship, mentorship or higher education coursework, including credit flexibility.</p>	11/4/2015 3:00 PM

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208	As per OAGC concerns..... The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself! As per OAGC recommendations: 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/4/2015 2:40 PM
209	This will severely limit support for ALL our students...especially TAG.	11/4/2015 2:18 PM
210	The minimum standards for serving gifted students needs to be kept in tact. This proposal is too subjective and allows for students to be served by someone who may have not had proper training or qualifications. With no minimum standards we risk providing quality services.	11/4/2015 1:59 PM
211	All options required by the state need to be offered to the identified child annually and confirmed with the parents at the district level.	11/4/2015 1:29 PM
212	Measures of success of the inputs should be spelled out. Minimum requirements of the gifted student service should be defined. The qualifications of the gifted program teachers should be specified.	11/4/2015 1:24 PM
213	The rules should be written with flexibility to administer programs at the local level, but they should require that a comprehensive plan include services at each grade level. In this area the rule are much too general and can allow local districts to only create service for certain grade levels (or only at one grade level). Gifted children need to have service throughout their K-12 education experience.	11/4/2015 1:13 PM
214	The proposed rule describing standards for quality and extent of gifted services omits the requirement that these services be delivered by specially-licensed instructors. Without this minimum requirement, the standards for quality and extent of gifted services would be inconsistent across school districts (those with licensed instructors vs. those with un-licensed instructors) and gifted student populations. Please re-instate the instructor licensing requirement.	11/4/2015 1:07 PM
215	The way the rule is currently written, it appears that anyone can teach gifted students. There need to be standards in place for choosing these teachers. It is concerning to think that there would be less qualifications needed to teach these students than any other population in the state. There are definite challenges related to teaching gifted students, and it is imperative that the state makes sure those who have this responsibility are adequately prepared and qualified. To not require this sends a strong message that gifted children are less deserving of a quality education than other students.	11/4/2015 12:54 PM
216	The rules as written give almost free reign to the districts to provide what they see fit. In our experience, the school staff members, very few of whom were trained to work with gifted children, had very little interest in doing much of anything out of the ordinary with either of our gifted students. The wording allows even more flexibility for the districts but my fear is that that just allows room for the districts to do even less with these students and to use staff members with little to no experience or training with gifted students, particularly gifted students also identified as having a disability.	11/4/2015 12:38 PM
217	I don't believe that speed should determine whether a child is gifted as long as the right answers are given. For some, taking a test causes anxiety which could cause the child to do poorly even though they do above quality work otherwise.	11/4/2015 12:24 PM
218	The following statement is very vague and will lead to serious discrepancies in service provided by various districts. Gifted students needs may not be met using these loose requirements for a service provider. An educator who has met district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students, as well as assist in the gifted identification process.	11/4/2015 12:21 PM
219	According to a recent report on high-achieving students, more than 7 in 10 teachers of these students surveyed noted that their brightest students were not challenged or given a chance to "thrive" in their classrooms. [1] Additionally, gifted students need gifted programming in many cases because the "general education program is not yet ready to meet the needs of gifted students" (p. 9) due to lack of general educators' training in gifted education and the pressure classroom teachers face to raise the performance of their struggling students. [2] - See more at: http://www.nagc.org/resources-publications/gifted-education-practices/why-are-gifted-programs-needed#sthash.rWfzyrMM.dpuf	11/4/2015 12:12 PM
220	It's true that the rule provides flexibility but too much flexibility is part of the problem and is linked to the second question having to do with quality and extent.	11/4/2015 11:59 AM
221	Involve the children in the planning of their programs based on natural inclinations and interests to inspire the love of learning.	11/4/2015 11:58 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

222	While your proposed rule provides a degree of flexibility and clearly describes standards as you desire them to be, it does not institute best practices. My specific changes for the proposed rule related to services would be to require services to be provided by a Gifted Intervention Specialist with a gifted endorsement from the State of Ohio. Gifted students deserve the guidance of a Gifted Intervention Specialist who has been credentialed with a gifted endorsement from the State of Ohio. Gifted Intervention Specialists have the training and experience to best serve the needs of this population. By watering down the requirement of qualified specialists that are credentialed by the State of Ohio to serve this population, you are sending a message that these students' special and specific needs are not important enough to serve with qualified specialists. These are our best and brightest...the future of our state, and you want to short change them in this way? Gifted students have specific special needs. Just as students who have other special needs in our schools have certified Intervention Specialists to help them grow to their fullest potential, our gifted students deserve no less than to have the specialists in our schools to help them grow and achieve to meet their fullest potential.	11/4/2015 11:46 AM
223	None	11/4/2015 11:43 AM
224	It seems the guidelines pigeon hole students into "gifted" for three years when that assessment may change per student on a yearly basis. Some districts go with the adage that once "gifted" always "gifted" which is far from true. It just makes the coordinators' jobs easier. By doing so, it takes away the opportunity to others to "move" into the "gifted" setting due to building space accommodations and staffing.	11/4/2015 11:40 AM
225	"District determined criteria" is too vague and open to much variation from district to district, with significant potential for limited access and inequality of services based on location, socioeconomic opportunity, etc. What are the criteria? There should be parameters for quality of service provider and extent of service provision based on the each level or qualification of giftedness.	11/4/2015 11:37 AM
226	Gifted students do not currently need flexibility from their schools they need more programming and choices. The gifted children need classes taught by teachers who are specially licensed. You would not have special education children on IEP's being taught by teacher who did not specialize in Special Education because it is detrimental to learning.	11/4/2015 11:28 AM
227	I support the draft offered by the Ohio Association for Gifted Children. This legislation guts incentive for districts to offer quality programming for gifted children by qualified instructors.	11/4/2015 11:26 AM
228	The quality and extent of gifted services will vary between districts with the potential for districts to meet the criteria but really not having to offer a level of service truly beneficial to the students beyond just fulfilling state requirements.	11/4/2015 11:17 AM
229	There needs to be specific licensing for a gifted services educator.	11/4/2015 11:13 AM
230	Waste of valuable resources. If the student is that advanced look for other educational opportunities outside a public school.	11/4/2015 11:08 AM
231	I am in favor of having Gifted Education Interventionists direct the curriculum for gifted kids; they have received more instructions/experience in dealing with the nuances of gifted kids, versus a teacher that meets "standards". Gifted kids should not be taught by just someone who passed a criteria test. Gifted students have different learning levels and personalities than standard students, and should be taught by individuals that have training in recognizing, developing, and encouraging these styles.	11/4/2015 10:58 AM
232	We need to include specific requirements on how you will support gifted students - there needs to be special instruction given to these students and it needs to be required in this rule. It's not enough to merely test them and identify these students as gifted. It is our responsibility to teach them under special curriculums as well. Well off school districts would likely be fine - what about the lower income areas? They need to be supported as well. Also, we need to add that any instructor of gifted children requires special training. That is missing here.	11/4/2015 10:55 AM
233	I do not feel that the plan clearly describes the services gifted students would receive. I also believe that the gifted instructor should be licensed to provide gifted services.	11/4/2015 10:54 AM
234	TOO MUCH flexibility.	11/4/2015 10:48 AM
235	Districts should be required to serve gifted students.	11/4/2015 10:07 AM
236	Districts should have some flexibility, but guidelines need to be clearly laid out in the rules or many districts will skimp on the services. Current proposal offers too much flexibility. Quality and extent of services is not laid out clearly in the rules.	11/4/2015 9:56 AM
237	It may describe the quality and extent of gifted services, but it doesn't hold the school accountable for providing an actual Gifted Intervention Specialist AND any sort of minimum hours per student or parent involvement. Leaving a lot of these details up to the school can lead to these services being cut or diminished too much.	11/4/2015 9:34 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

238	<p>The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." Recommendation: 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/4/2015 9:34 AM
239	<p>Flexibility is appreciated, however the vagueness of the rule means there are no standards or measures of success for the students, nor am I satisfied the rule will ensure the best possible teaching staff for the students.</p>	11/4/2015 9:33 AM
240	<p>The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services.</p>	11/4/2015 9:17 AM
241	<p>Services need to be provided by an individual with the proper qualifications. The minimum service minutes and case load requirements need to be included to ensure the service provide is a quality service.</p>	11/4/2015 8:58 AM
242	<p>I feel that the best placement for gifted students is with a licensed Gifted Intervention Specialist. In our district, "growing" our gifted students each year is a major concern. A Gifted Intervention Specialist has the skills to work with these students and help them grow to their full potential. There is also a huge social/emotional aspect of giftedness. The GIS are specially trained to work with these children and look for signs of anxiety, perfectionism, etc.</p>	11/4/2015 8:54 AM
243	<p>Poorly funded districts should have the same standards as more affluent districts!</p>	11/4/2015 8:46 AM
244	<p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/4/2015 8:35 AM
245	<p>These proposed rules eliminate all quality of service measures, including caseloads, levels of service, and even the definition of what a service is. If your goal is to provide flexibility by making sure school districts have to do nothing, then you've done a good job. Otherwise, the lack of any requirements, including eliminating requirements for gifted specialization when servicing gifted students, is the opposite of a "rule clearly describing standards for the quality and extent of gifted services."</p>	11/4/2015 8:33 AM
246	<p>Improve the standards- don't diminish them. Removed from the gifted standards is a requirement for the instructor to be specially licensed and clear parameters of the minimum a district must do to serve gifted students. This is what happened with the 5 of 8 rule, when minimum standards were cut for art, music, and physical education teachers, librarians, nurses, counselors, and social workers. With budget cuts and unfunded mandates, gifted education will be cut by Ohio's poorer districts in an effort to balance their budgets, leading to more disparity in the quality of education kids can receive in Ohio.</p>	11/4/2015 8:19 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

247	<p>1.Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2.Reinstate and more carefully define service and instructional settings as provided in the current standards. 3.Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4.Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5.Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6.Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/4/2015 8:18 AM
248	<p>Districts should not receive special flexibility to assign educators worthy of teaching gifted children. Many times gifted children are co-taught and the gifted teach needs to be well versed in all subject areas. Special training is needed. Also, gifted teacher need to have a background on the emotional needs of a student. Often gifted children have different emotional needs than other classmates and those need to be identified and addressed. Having a specific gifted teacher that is a gifted coordinator and that has met the current education certificate is crucial in aligning compensation with the task of teaching gifted children. Having a random teacher, aide or adhoc coordinator doesn't align compensation. Also, currently having a child on a gifted program provides legal rights to those children by having a specific coordinator and educational background to teach those children, by allowing anyone to teach these children and not having standards in place for differentiating the lessons, the legal recourse of a parent is taken away.</p>	11/4/2015 8:07 AM
249	<p>The law should still specialize that the person conducting the services has an appropriate degree as a gifted intervention specialist</p>	11/4/2015 7:49 AM
250	<p>It appears that standards have been eliminated...</p>	11/4/2015 7:39 AM
251	<p>If you wish for the children in the state to be supported within their gifts and talents, you must support them by trained individuals. The flexibility described allows for districts to "serve" children without the support of trained individuals.</p>	11/4/2015 5:59 AM
252	<p>Question: What determines a "district-determined criteria?" Some local power can be positive; however, not possessing the appropriate credentials could prove detrimental for gifted students. Will these district educators be appropriately trained? Will they truly have an understanding of the gifted mind? Will they be able to meet the intellectual, social, and emotional needs of gifted individuals? Will they, also, be able to provide services in the area of SPED? I don't think so. . . Since gifted and SPED are similar in that they both meet individual needs, why are Gifted Intervention Specialists being reduced to unimportant mentors and gifted students reduced to individuals who can have their needs met by local district control? I know of many colleagues who do not support gifted services. Will they meet the needs of gifted students? No! They will not.</p>	11/4/2015 5:25 AM
253	<p>Without any definitions of services, without any parameters defining services, how am I supposed to know that what my local district is doing is appropriate for gifted children? As a taxpayer, I want to know that they are really serving gifted children appropriately. The lack of rules and definitions means that they can call anything a service even if it is nothing more than a weekly hello by a teacher to a student. I am the parent of a gifted child, now grown. I can tell you her learning needs were unique and required her to have teachers who were able to recognize them and address them. I was lucky enough to be able to choose her teachers in elementary school, and could make sure she had a strong teacher, even if it was not someone with a gifted certificate. Not all of them did okay, but even the good ones still resorted to giving her extra work or using her as a teacher's aide rather than giving her different work based on her needs. My daughter does not have the luxury of picking her children's teachers; it is luck of the draw in many cases. Some have been good and most have been well-intended. But, they still are not equipped to handle some of my grandson's academic needs that go with being gifted. I don't understand why you would require a teacher of special education to hold a special certificate to teach those students but think it is okay to let just anyone teach a gifted child. The proposed rules indicate a district can decide who is qualified. Well, in my experience, district leaders do not always know what is good instruction for gifted children or even think gifted children have special needs at all. They are not always the best people to decide if a teacher is qualified to teach gifted children, and there will be many gifted children who will go without appropriate instruction unless the state sets the rules about who can teach these students and how.</p>	11/4/2015 5:09 AM
254	<p>Our district is underfunded, due to failed levys. If it is left to the district to qualify its own services, I'm concerned they will only provide what they can (very little), rather than provide what they should (high level of instruction/services), based on a minimum agreed upon level of service.</p>	11/4/2015 12:06 AM
255	<p>Entirely too much being left to the district to decide. Terribly wishy-washy. Need minimum standards (class time, case loads, settings, etc.) defined. Also need to require teacher be certified by state not by "district-determined criteria".</p>	11/3/2015 10:52 PM
256	<p>This is probably the worst survey instrument I have ever seen. If you just let teachers do there job and determine what they, in their professional judgment, deem gifted I'd not have to spend my evening doing this.</p>	11/3/2015 10:23 PM
257	<p>While it is understandable that different districts need flexibility in terms of how gifted students are served, there remains a tremendous range and potential disparity in the type and quality of services that are provided, depending on where students live. I recommend a mechanism for feedback within specific districts wherein parents can evaluate the services provided to their students.</p>	11/3/2015 10:02 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

258	Too wide open who can provide services, I don't think districts should have complete autonomy on qualifications for service providers who do not have gifted licensure. While I believe minutes requirements for services should be significantly reduced, I am uncomfortable with it being nothing. I would not want to see it more than 80 minutes though and would be comfortable with it being as low as 30.	11/3/2015 9:40 PM
259	It doesn't clarify the required classrooms settings and teaching degree criteria so different districts may have different standards of gifted teachers, some of which will no longer be required to have credentials in gifted instruction. Also there needs to be established minimum time period for gifted programs to ensure districts are providing enough time and instruction to truly expand what gifted students are capable of learning.	11/3/2015 9:36 PM
260	Gifted services should be offered starting in Kindergarten in all districts. The earlier the intervention, the better. The general guidelines are great, but the rule does not state when gifted services should begin within a student's educational life. I can tell you both my children are extremely bored during the normal Common Core part of the day. The word they both use is "torturous!" I had the same problem when I was in school. Everything went at the pace of the slowest child in class. However, now it goes at the pace of the slowest child in the country! Please, intervene earlier! Gifted students earlier stimulation!	11/3/2015 9:22 PM
261	Regarding the "how" question, The proposed rule obliterates all standards of quality service so it is impossible to answer this question. The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/3/2015 8:52 PM
262	The proposed rule obliterates all standards of quality service. The proposed rule eliminates all quality service including case loads, minimum levels of service and even definitions of service itself. The proposed rule eliminates gifted staff qualifications. I recommend the following: 1.Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2.Reinstate and more carefully define service and instructional settings as provided in the current standards. 3.Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4.Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5.Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6.Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/3/2015 8:07 PM
263	How soon after identification does the WEP need to be completed? Does this require districts to provide gifted services?	11/3/2015 7:56 PM
264	For school provided services, it is important to have gifted intervention specialists providing primary services (for example, in a cluster gifted class). Allowing school districts to set their own standards for who qualifies to teach gifted children allows too much leeway for subpar services. Secondly, please be more clear about equality. My child attends a low-income school. Gifted children from his school are bussed to another school in the district for gifted services. Due to transportation constraints, these children are bussed back to their home school 1.5 hours prior to end of school day. Every other gifted elementary student in this same district gets a full day of gifted services/week. The district claims these children are getting equal services, yet they are receiving 50+ hours less of gifted intervention than peers. This is unequal and unacceptable.	11/3/2015 7:40 PM
265	needs to be more flexible to include outside school day services for performing arts options	11/3/2015 7:40 PM
266	This provides flexibility.	11/3/2015 7:14 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

267	As a retired gifted coordinator, I know too well what many districts will do with these statements: b) An educator who has met district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students, as well as assist in the gifted identification process. c) An individual with specialized skills required to implement the student's gifted service where the service includes an internship, mentorship or higher education coursework, including credit flexibility. Many districts will use these statements as a way of having "just anybody" do "just anything" with their identified students to say that they are serving them. The curriculum will often not contain substance and will many times be done by someone that they need to find something to fill their schedule. Reinstate current qualifications for gifted coordinators, intervention specialists and gifted instructors to ensure high quality professionalism and curriculum that contains depth and substance.	11/3/2015 7:01 PM
268	You aren't showing us how the rule is changing. Specifically, what in the old language is being removed and what new language is being added. Parents need to be able to see exactly how the rule is changing if they are to adequately assess whether or not they think the changes are helpful. Because of this fault with the survey, I have to mark strongly disagree.	11/3/2015 6:53 PM
269	I love the flexibility that this gives districts for several reasons. 1) Gifted Intervention Specialists are few and far between. 2) Our district does not have the financial resources to provide services when the services had to fit into the minimum number of minutes required by the 2008 operating standards. When the 2008 standards were implemented, we actually had to cut services in order to meet requirements. This meant less students ended up being served. As money became tighter, we had to make additional cuts to gifted services. The new standards give districts more flexibility which may allow my district to reach more gifted students.	11/3/2015 6:51 PM
270	Teachers providing gifted interventions must possess a degree or endorsement in the area of gifted education	11/3/2015 5:43 PM
271	Too many times the word "differentiated" is bandied about as if it is a cure-all for students with either disabilities and/or "giftedness". We all know that true differentiation within the classroom is nearly impossible given all the levels of instruction that have to be met. Gifted students too often are used as tutors, or they finish their work and are given more to do (a punishment in their eyes) not necessarily DIFFERENT work that specifically meets their needs. They NEED different classrooms especially in ELA and Math/Science areas to address their advanced needs. In middle school this can easily be achieved since everyone changes classes anyway. In elementary grades, the children need to be clustered so the teacher has a reason to differentiate. In high school it is a natural progression to the harder leveled classes. We need administrators to realize that these kids have their own special set of issues that not every teacher is equipped to deal with. This doesn't make them elite, any more than a child with an IEP is elite.	11/3/2015 5:40 PM
272	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPS. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/3/2015 5:35 PM
273	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPS. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/3/2015 3:21 PM
274	1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. 5. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPS. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/3/2015 3:21 PM
275	The proposed rules are lacking in SO MANY areas! there are no "minimum" levels of gifted programs, so some districts might do hardly anything for their gifted students. There are no requirements that the gifted instructor be licensed for teaching gifted students. There are no real guidelines for the services to be provided for these students! The highly selective colleges in our nation (ivy league and others) basically give lower income students full ride scholarships - our schools should provide every opportunity for these students to thrive and excel. These proposed rules do not promote this by the schools - instead your proposed rule allows them to do hardly anything and still act like they have a gifted program. Shame on you for minimalizing the gifted program requirements.	11/3/2015 2:33 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

276	I want to keep the standards across the state and require specialized, licensed teachers.	11/3/2015 2:30 PM
277	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/3/2015 2:13 PM
278	By removing the current requirements & definition for service and allowing districts to determine their own criteria for service, students will experience drastic variance in quality of service provided in the state. However; state reports of students served will indicate an INCREASE in service based on the "looser" requirements for service. EMIS reporting will be ineffective if the current specific language of what constitutes service is removed. Request for the following in the Proposed Standards: *Include language from the current operating standards to define service and instructional settings and gifted coordinators and gifted intervention specialists roles *Inclusion of the specific definition of service(s). Specific language as supported in the current OS should be included (instructional time, specific service requirements for service settings, caseloads, training for classroom teachers) *Specific language requiring trained staff for gifted students. Classroom teachers can meet the needs of gifted students but should be required to receive on-going high quality training and support from trained gifted staff. (Other populations of ability levels are afforded this accommodation.)	11/3/2015 1:15 PM
279	I do not agree that the students should continually be tested during the year. I think that they should have a beginning of the year assessment and an end-of-the-year assessment. If during the year, the teacher feels the student is overwhelmed, the teacher should have the right to propose that the individual may be tested to see if they should still remain in the gifted curriculum.	11/3/2015 1:07 PM
280	More needs to be put in place for classroom teachers to recommend and follow through with gifted testing based on classroom performance. Almost make it mandatory so fewer students are missed that could and should be identified for gifted services.	11/3/2015 1:06 PM
281	The new rule provides no specific guidance for service.	11/3/2015 1:02 PM
282	Gifted students should be taught by teachers trained in providing gifted services.	11/3/2015 1:01 PM
283	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/3/2015 12:50 PM
284	need qualified teachers to teach the gifted!	11/3/2015 12:50 PM
285	Suggestion: Further guidance with specific information on the quality and extent of professional development needed for regular classroom teachers who will be working with and providing services to gifted students.	11/3/2015 12:47 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

286	<p>First Question: The proposed rule obliterates all standards of quality service so it is impossible to answer this question. Second Question: The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. I support these OAGC recommendations: 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/3/2015 12:42 PM
287	<p>Yes, the rule "describes" standards but those standards are not adequate to meet the needs of gifted students. A general education teacher - which I am currently - has virtually no instruction in teaching gifted students. In an urban setting, these gifted students are capable of much greater academic work than their peers and expecting a general education teacher to understand how to meet those needs or even have the resources, especially of time and flexibility to instruct a student who already knows 70% of the daily content is unreasonable. When comparing our country to other developed countries our brightest students are achieving at drastically lower levels - why do we want to encourage that trend by having unqualified staff teach them?! Realizing the potential of gifted students takes more than a differentiated program, and while I think differentiation is great, it is very difficult to meet the needs of our outliers in a room of 28 students. Rather than reduce the quality of gifted education for students we should find ways to get more teachers gifted endorsements so they can better understand the emotional, social, academic and sensory needs of the gifted population.</p>	11/3/2015 12:30 PM
288	<p>2b is very "fuzzy", giving the district a lot of wiggle room on what is qualified.</p>	11/3/2015 12:15 PM
289	<p>There is too much flexibility which means schools will divert funds away from gifted education. What is the harm in mandating 225 minutes of intervention a week?</p>	11/3/2015 12:12 PM
290	<p>"Flexibility" isn't the same as having no standards. This rule does not articulate any standards for quality of services, and eliminates those standards and protections currently in the law.</p>	11/3/2015 11:38 AM
291	<p>I have a problem with 2b depending on what the district deems as appropriate training. Those of us who have certification went through about 30 hours of training and I think that it's important for teachers teaching serving gifted students should be especially trained. I'm also wondering what this does to the 225 minute mandate. I think that having this number greatly helps districts who can serve to have the backing that the students NEED four hours a week for these kind of services. I'm worried that districts will think that very little specialized time could still count at service.</p>	11/3/2015 11:38 AM
292	<p>The WHAT is missing. The quality is described for the who is managing the service, not the service itself. The extent is to what limit the service can be, which can be limited as well. Does this apply to K-12, include college course, or courses in MS for HS credit. Does it apply to Universities and Colleges? Does the extent integrate into field trips and after school events or clubs? The extent is not clear to me.</p>	11/3/2015 11:30 AM
293	<p>I strongly disagree with your definition of service providers for gifted students. Only teachers with Gifted Certification, who have been trained to deal with all the issues that arise when teaching gifted students should teach them. No one else is qualified to serve these students. It will be a total disservice to the students to have unqualified educators as their teacher.</p>	11/3/2015 11:07 AM
294	<p>I think the allowance for district determination of requirements for meeting the standard for if the individual is qualified to provide gifted services is too broad and may result in those that would not meet level of expertise that is commonly required in education across the U.S. and may weaken the educational instruction of gifted students. Ohio should not focus on just those with special needs, but gifted students need additional support too. Gifted education should be supported by state funding in addition to local funding so that all districts have ability to provide gifted education.</p>	11/3/2015 10:53 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

295	I support retention of the old standards at a minimum or adoption of the OAGC proposed standards which can be found at: http://www.oagc.com/files/DraftOAGCResponseto9.11.15ProposedRuleChanges.10.21.15.pdf	11/3/2015 10:34 AM
296	Set specific standards for who is qualified to prescribe and provide gifted education services. I retired in June, 2015, and my district has chosen to not fill the position of Gifted Coordinator. The educator who is assigned to "oversee gifted services" has the following credentials: Attended a weekly pull-out enrichment class in grades 3-6, taught remedial reading for 2 years, has been a district literacy coach for grades K-3 for the past 3 years, and has good computer skills. This person is woefully under-educated in the field of gifted education, but she would meet the letter of the proposed rule!! Set specific time/frequency requirements for services with genuinely qualified personnel. The proposed rule would allow a district to claim something as minimal as "20 minutes per week to read above-grade-level material" as gifted education services. Should be re-named "gifted education dis-service".	11/3/2015 10:26 AM
297	hours pull out and integration RESOURCES+FUNDING	11/3/2015 10:26 AM
298	At the high school level, a student who is receiving services via an advanced placement class is by definition--as long as the AP class is taught appropriately--receiving gifted education. It is inherent in the nature of the course, making a detailed WEP for a high school student in an AP class largely unnecessary. The same would be true of gifted students taking college courses for dual enrollment purposes.	11/3/2015 10:24 AM
299	Flexibility for the districts should not be the consideration here. The consideration should be what is best for the students. This allows districts to lessen the services they might already be providing in the name of flexibility. Other identified populations, have very specific rules that govern how students are serviced. Gifted students should be treated no differently.	11/3/2015 10:23 AM
300	I think this is overly vague	11/3/2015 10:17 AM
301	These services need to happen during the day - not as homework!	11/3/2015 9:59 AM
302	The proposed rule doesn't indicated when the services must begin. Additionally, it does not require instruction by an individual with certification in the gifted area. This short changes gifted students. Services should be offered early in elementary school, just as they are for those with learning disabilities. Classroom settings can be just as challenging for gifted students, who are not engaged, as they are for those with learning disabilities. A young, gifted child, can quickly become disengaged with school when not challenged or understood by his or her teacher. Without the proper resources, including an instructor trained in serving gifted students, the child may perform poorly and never reach his or her potential due to the lack of attention and resources required to be provided to gifted students under this proposal. I personally watched my child go from one who enjoyed school in kindergarten, where he was in a private setting with challenging course work, to one who complained every day about going to school by 2nd grade, when he had been in the public school for 1st and 2nd grade. He is now in a gifted program. While this program is only one day a week, the difference in his outlook and engagement has drastically changed. He rarely has issues during the day, even when he is in the regular classroom. This is a drastic difference from a year ago where is was regularly "pulling his card" for distracting behavior. I strongly believe that he had been offered a more challenging program earlier 1st and 2nd grade would have been a better and more fulfilling experience. I strongly believe that it is imperative that the standards for gifted students be given as much weight and importance as those for students with learning disabilities.	11/3/2015 9:41 AM
303	1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/3/2015 9:13 AM
304	This eliminates all quality standards from the rule. This does nothing to help the gifted population. Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/3/2015 8:56 AM
305	The language of meeting district guidelines for gifted certified teacher needs to be removed. Gifted instructors need to be state certified in order to insure they are qualified to provide services. There also needs to be language to be certain that gifted children actually receive services, not just a written plan every year. According to the way it is written the children only need to have the same access as other gifted children. If a district doesn't offer any services to any child then they are meeting the rule.	11/3/2015 8:42 AM

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306	Deferring to local control is not a wise use of gifted funding because accountability and quality will be diminished and immeasurable. Additionally, most local districts do not have necessary resources (guiding documents and ID tools) or knowledge to understand or implement gifted ID. Minute requirements also need to be restored. When minute requirements were removed from music and art, numerous programs were weakened, decreased and/or eliminated across the state.	11/3/2015 8:26 AM
307	This guts any programs that are now in place. When push come to shove districts with money issues will just eliminate all services. This is BAD!!!!!!	11/3/2015 7:40 AM
308	Services for gifted students should also include assistance with social and emotional needs of the gifted. Any expert in the field could explain the many reasons why. For example, a child may be capable of more challenging coursework, but if the child hasn't been prepared (via gifted programming targeting social/emotional needs) how to tolerate frustration when something doesn't come easily (as it does in less challenging classes), the child is not as likely to be successful in the more challenging coursework (because they don't know how to "tackle" a true challenge). Just as SpEd students need "life skills" training, so do many gifted students - just in different ways - because they are also markedly different from the norm.	11/2/2015 11:28 PM
309	The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/2/2015 10:59 PM
310	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/2/2015 10:42 PM
311	People offering gifted services need to be a gifted intervention specialist, the other criteria only serve to dilute the quality of services. I am not sure about specific language, but districts need to be compelled to provide services. In our district they test for artistic and musical aptitude, but even if kids are gifted they are not required to do anything. Why bother if this is the case?	11/2/2015 10:18 PM
312	I cannot answer the first question as the proposal removes all standards of quality service! Regarding the second question, the proposal has eliminated all measure for quality (e.g., caseloads, minimum levels of service, definitions, etc. Why? We have a variety of EMIS codes (20+) which will be whittled down to three? Why? How will we tell which is effective and which isn't? What if a district determines that their service will be ten minutes once per week?!!! Will the teacher be trained?!!! The proposal seems to eliminate the gifted staff qualifications in favor of what districts choose...big mistake!!! Is this the same for other populations...special education, classroom teachers, etc.? Why gifted? The proposal seems to allow districts to define service, define who is qualified to provide service, etc. Not acceptable! The gifted indicator is then useless. Don't do this! Please... reinstate minimum service minutes and caseload limits reinstate and more effectively define gifted service and instructional settings do not allow poorly or untrained gen. ed. teachers to provide gifted service (with the exception of accelerated placement) reinstate gifted coordinator and GIS qualifications for districts and ESCs reinstate the instructional time requirement for GISs ensure that all gifted instructors are provided high quality professional development WEPs - require parent/guardian signatures, require that gifted personnel collaborate on the writing of WEPs, and increase the scope and depth of the WEP	11/2/2015 9:08 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

313	Certified GIS. Again, this is too vague, plus service should be mandated (oh, and funded, too).	11/2/2015 9:05 PM
314	I do not see clearly how you will ensure that the instructors will have the quality skills necessary to provide the kind of G & T education that is necessary for our students. Who sets the standards? My fear is that lower performing districts will set the bar too low and our more impoverished students will be neglected as a result.	11/2/2015 8:59 PM
315	I am urging that the ODE please carefully consider making the following changes, as the parents of gifted children and other advocates are standing as one united force! Unless you have a gifted learner, and truly understand what it takes to service them correctly- what you all are proposing will be detrimental to the gifted child's overall services as well as stifle their learning capabilities. The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPS. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/2/2015 8:44 PM
316	This rule allows districts to do very minimal work to service the needs of gifted students. Pull out programs are not generally liked by the students because they miss work in class and have to make it up. Districts should be required to provide actual classes in the areas in which these students are identified as gifted. Only in doing this are these students really served. Also, the teachers working with these students should be qualified gifted education teachers, similar to how students with special needs are taught by special education teachers. Unfortunately many teachers do not understand gifted students and how they learn and won't deal with them effectively.	11/2/2015 8:41 PM
317	The current plan gives districts too much leeway in the type of gifted instruction that gifted student will receive. It's wonderful that the districts have options, but under this plan, it seems like an hour of gifted instruction a week could be acceptable, which is clearly not what I would want for my child. Also, the district could, under the plan, offer only out of school opportunities. I think those opportunities can be valuable, but it should be up to the family and child to choose them. Districts should be required to offer at minimum a half day a week of gifted education, preferably a whole day a week minimum. If the family and child wish to take advantage of an internship or mentorship program instead of this time, that's great, but it should be their choice, not the district's. I also have concerns about the fact that the district could assign the gifted instruction class to just about anyone they feel is "qualified". I don't want to enforce unnecessary certifications, but some amount of rigor around what is an acceptable level of qualification would be nice.	11/2/2015 8:25 PM
318	"an educator who has met district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction "..... this means the educator does not have to have a license to teach gifted. Each district can determine its own criteria about who is qualified to teach gifted which does not support the the idea of "highly qualified".	11/2/2015 8:13 PM
319	The standard for quality is not specified as the educator credentials and performance can vary greatly. 1) Need requirement of credentials/certification for gifted interventionist -not subjective according to district. 2) clarify process of how to proceed if plan needs modification before next review date. What is the process for a team member to request changes to wep, perhaps if a strategy is not working as expected?	11/2/2015 8:09 PM
320	1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPS. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/2/2015 7:59 PM

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321	I don't understand why after all these years gifted services are still optional.	11/2/2015 7:56 PM
322	Gifted students must be taught by teachers who are trained in the specific issues gifted students face. We would not ask someone who wasn't trained to teach a student with severe learning disabilities; why should we accept the same for students who are at the opposite end of the spectrum? In addition, students who are twice-identified present their own unique characteristics that make them unlike any other student, and experts should be the ones delivering their instruction in a gifted setting.	11/2/2015 7:55 PM
323	I appreciate the flexibility and I believe that it allows for just that, flexibility. But, with flexibility also comes an ability to stray from best practice if the policy does not also have clear boundaries. I would suggest clear boundaries (time limits of service, quality of service providers) be included so districts cannot stray from best practices.	11/2/2015 7:36 PM
324	2b is ridiculous. Specialized training is a must.	11/2/2015 7:24 PM
325	I think the teacher needs to be specialized teacher for the gifted and not a "district-determined criteria". That just gives districts the ability to let anyone provide the service which could render it meaningless.	11/2/2015 7:19 PM
326	The "district-determined" criteria option will lead to widely varying interpretations. As does the vagary in the services provided.	11/2/2015 7:08 PM
327	Service to G/T students must be delivered from a trained teacher who specializes in that arena. Given the opportunity, districts will, due to budgetary necessity, place the burden of G/T instruction on classroom teachers. This will be to the detriment of students.	11/2/2015 6:49 PM
328	3ai states that districts do not need to require a gifted intervention specialist be on staff, but may determine guidelines for who instructs gifted students. The guidelines should state that a licensed gifted intervention specialist teach gifted students.	11/2/2015 6:17 PM
329	I'm concerned that there is no mention of teachers needing a gifted endorsement and no mention of how to deliver quality instruction. Working with gifted learners takes a specific skill set that is not taught in regular teacher preparation courses. I think it imperative that instructors of gifted learners know about the needs specific to their students as they can be very complicated. From what I've seen, regular education teachers who do not have this background do not understand gifted learners and too often do more harm than good because they are unfamiliar with how to teach them. I also fear that without guidelines on gifted services, districts could short change gifted learners by offering sub-par education in the name of saving money. It would be a travesty not to properly educate those among us with the most potential. Every one of us would pay for that loss of potential. The person who will cure cancer sits in our gifted classrooms today. We need to give him/her the tools to be successful.	11/2/2015 5:39 PM
330	Teachers teaching gifted classes should have a gifted endorsement license. Districts require teachers to have an Intervention Specialist license to serve IEP students.	11/2/2015 5:29 PM
331	The proposed rule allows districts to set their own standards for the quality and extent of gifted services, and, by doing so, sets no standard for Districts to adhere to. It's like telling your children that bedtime will but strictly enforced but letting the kids choose the time.	11/2/2015 5:16 PM
332	All districts should be required to identify and serve gifted children. Just like other children with disabilities or language needs are served, children that are gifted should be served. Otherwise, parents like myself will withdraw from the public schools and the testing. We will be forced to seek a private education. When levies fail, these rules offer no protection. Gifted teachers, like special needs teachers, should have specific licensing so that they are taught to educate gifted children and are certified to do so. At least stay with current regulations or make them stronger for gifted students. You will bankrupt Ohio if you don't support your smartest kids.	11/2/2015 5:04 PM
333	Anybody can be assigned as a gifted education instructor with the stripping of the certification. I have never been a proponent of the certification but we need standards. In some cases the teacher's own success in a field- in or out of school- should be considered..	11/2/2015 4:09 PM
334	Abolish state-run schools.	11/2/2015 4:07 PM
335	Those who teach/guide gifted students should be certified in that professional focus. Also, I think the "flexibility" of this standard is far more beneficial to school districts than it is to the students themselves ... making it far easier to absolve districts from actually providing adequate (let alone ample) opportunities for gifted students to learn as much as they can in their areas of interest/giftedness. It's possible to guide/teach gifted students without being gifted oneself, as long as the teachers don't feel in competition with, or jealous of, their charges ... which the non-certified teacher may be prone to.	11/2/2015 3:58 PM
336	These new outlines are vague compared to the stringent requirements of previous standard requirements. I'm not happy that it doesn't specifically require those with Master's Degree to teach gifted students.	11/2/2015 3:47 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

337	This rule basically says that the gifted kids that are not served in classroom now will be labeled served if the superintendent says so. This is just crazy. Classroom teachers are now going to be expected to provide gifted students with appropriate intervention with little to no training. And then when the kids fail, it will be the teachers' fault. This is unfair to children and teachers.	11/2/2015 3:35 PM
338	Gifted students should be SERVED by educators who have trained and studied giftedness and how best to challenge gifted students.	11/2/2015 3:33 PM
339	Teacher and specialist must be trained and certified by State/ Collage as accredited in gifted student education.	11/2/2015 3:21 PM
340	I can't properly answer the first question, as this new rule completely obliterates all standards of quality service. Were special education to receive the same treatment as is being done to the services for gifted students, you'd be facing numerous lawsuits. There needs to be a concrete definition of what a "service" is for a gifted student, and there must be standards in place for each type of service. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. Specific changes: 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/2/2015 3:20 PM
341	Seems good, but not clear as a parent/outside, how this will play out at the district/school level.	11/2/2015 2:57 PM
342	Having GIS who are licensed versus someone who meets "district-determined criteria" is essential to proving quality services. Too many districts don't place enough value on gifted services and will make the decision with their wallet and not what's best for the kids. We wouldn't let the district set criteria for what constitutes a teacher certification so why would we even think of doing it for gifted students.	11/2/2015 2:53 PM
343	No Standards = No standards! Please reinstate minimum service minutes and caseload limits, carefully define the services and instructional settings that are provided through the current standards, and please remove the provision that allows poorly or untrained general education teachers to provide services. As a requirement from the state, teachers of the gifted needed an endorsement to teach gifted students. Why would we eliminate these qualifications from hard working teachers, who challenge the gifted students and fully understand the social emotional needs of the children they teach?	11/2/2015 2:36 PM
344	The WEP should be developed annually for each student and reviewed during each grading period similarly to the IEP.	11/2/2015 2:27 PM
345	Not at this time, but I am concerned that in my grandson's district they have a "challenge" program for the 3rd grade, but none for the 4th grade? I do not understand how his education will be addressed next year when he is a fourth grader.	11/2/2015 2:21 PM
346	These rules are extremely vague and will certainly lead to reduced services for gifted students	11/2/2015 2:17 PM
347	There are no standards of quality. Guidelines need to be stated. Service minutes? Settings? Training for gen ed? Qualifications for GIS?	11/2/2015 1:45 PM
348	Remove the provision that allows poorly trained teachers and reinstate gifted specialists. Reinstate minimum time limits teachers must spend with students.	11/2/2015 1:44 PM
349	First question - I agree, HOWEVER there may be too much flexibility here for schools/school districts. It doesn't appear that there is a minimum threshold for districts to follow. This may still lead to a huge discrepancy within the state of Ohio for how gifted children are engaged. Second question - Who is responsible for writing the Written Education Plan? Is there a standard for who should be able to author this? Again, I did not read any minimum thresholds here. Also, at the rule reads "student", will a plan be put in place for each individual student? How will this be implemented for a district like Columbus City School District?	11/2/2015 1:07 PM

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<p>350</p>	<p>I have a problem with the language of this entire section as I believe it is fraught with problems that could narrow the quality of instruction, the type and scope of Gifted and Talented Services; eliminate school/community partnerships; re- focus Gifted education to serve a narrow subset of children and limit the possibilities for providing quality instruction K - 8 grades. Here are a few of my concerns: Services (c)(1)(a) I'm trying to remember the language but the concern was that by linking the Gifted instruction to the typical day and duration of the course it brought up a number of concerns - 1. Would this link this to four 9 week quarters? two semesters? or to the entirety of the school calendar year? This is very problematic for me as many school districts have been able to provide Gifted and Talented opportunities by linking with community organizations so private/public collaborations or sometimes public LEA's have linked with State programming: this would so narrowly constrain the time frame for when these could occur it would prevent partnerships that extended the school day, week, or year. You have language that speaks of providing opportunities through mentoring, internships, and dual credit course work so you're really only identifying a small subset of opportunities aimed at Grades 8 - 12; this would eliminate most K -7 opportunities and reduce partnerships with entities outside the school. Schools would be unable to link up with programs provided by recreational centers, community/leadership development, could limit K-12 development in STEAM - Science, Technology, Engineering, Arts, and Math as many of those programs partnerships with businesses or colleges extend the school day, school week, or school year - this language would eliminate growth in the fundamental areas fueling the jobs of tomorrow and would delay those options until High School; by then many students will have been so turned off or will have missed that opportunity to build skills and interest during those early formative years. Again it also would eliminate linking to community programs that run after school or on the weekends; you would be failing to serve the developmental and community needs of K - 7. It would eliminate opportunities to link with other programs across the state, opportunities at our Nation's capital, other out of state - national programs not held at the capital, as well as inter- national programs. Also under services the way you use the term "Objective data" is terrifying as again it seems like you would align all goals to a narrow academia benchmark such as performance on State or National tests, so where would getting an opportunity to explore robotics fit in? The implications for this language have the potential to gut Gifted and Talented services and forget that by providing these services were supporting the engineers, artists, and explorers of tomorrow. I believe it was in section: Services (c)(1)(b) that again the language is too narrow - I think it defines opportunities through the curriculum to be adapted to allow - "enhancements, extensions, and an increase in duration" basically this is business as usual so for a Gifted and Talented student for whom the over-all curriculum is not exciting and engaging instead of that student being able to link with outside Specialist or experts you would chain them to the doldrums of current academia which offers an academic rigor below the comprehensive Global Standards for excellence and you'd just ramp it up enough so Districts don't have to build any exciting creative community partnerships and you'd just give students a longer time, or slightly more technology, and extensions - but this would be more in class research so they couldn't accept under the narrow terms of mentoring which typically doesn't occur until college, escape from the general education curriculum which fails to be beneficial to this population. The language of who provides these services to Gifted students is too fuzzy! When it tries to be broad it's vague when it's specific it seems to eliminate licensure standards. Gifted and Talented Services frequently are the equivalent of Special Education Services for the brilliant; sometimes these students are Special Education students who are twice exceptional; so it is critical to have highly licensed Gifted and Talented Specialist that identify the unique needs and educational challenges for this group. Also this group is not homogeneous. If the State ODE is concerned about a financial burden to school districts struggling to provide quality G&T it should provide more funding or find ways to help them creatively link together to share resources and create cross district programs rather than gut educational standards for Gifted and Talented Teachers. The role of the Gifted and Talented teacher is even more critical to set the goals and objectives when linking with outside programs or experts in fields such as STEAM - as these experts wouldn't be able to create the developmentally appropriate curriculum that aligns with graduation and future secondary education opportunities; so even when components of G&T might be deliverable with non - G&T licensed specialist it would be more critical to have their over-sight not less. Under settings the (3)(iv) use of formative and summative assessments: this sounds like you're linking G&T to RTI; it seems like only CBM's or State or National Benchmarks would suffice at the K-7 level; again this would actually diminish the standards not elevate them. It would also grossly narrow if not gut Gifted and Talented which by design is supposed to be more individually focused and refined and should rely on the body of student work and performances and portfolio's which provide more of a format for showing off excellence; it could also be linked to participation or awards won through merit programs (not all of Ohio's Districts are linked to the National Merit Society but that is one type of merit program). The language is not well thought out and contracts and roles back thirty years of surveys on how to create, implement, and judge effective Gifted and Talented Services. It should also be of note that while it might be costly at first for Districts to set up G&T - these programs frequently pay for themselves in the long run because they bring innovation to the regular education classroom as well and frequently the Gifted and Talented Specialist not only instructs students identified under G&T labels but also helps train the General Education teacher to better support excellence in all students; this builds stronger districts which in turn builds stronger communities and provides for future community leaders in government and business. That's what all communities want and need is investment in their best and brightest innovators. So this language which constricts and dumb's down standards for G&T should be stricken or revised to "may include formative and summative testing".</p>	<p>11/2/2015 12:55 PM</p>
<p>351</p>	<p>- The gifted services should be provided by a specially licensed gifted intervention specialist, not just any educator who meets "district-determined criteria." - There are no clear parameters of the minimum a district must do to serve gifted students. That could result in gifted children getting little to no benefit from their respective program, b/c the programs are not adequately developed or carried out.</p>	<p>11/2/2015 12:43 PM</p>

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352	All schools should recognize all areas of giftedness and be able to provide services for all gifted students. For instance, creative thinking ability and cognitive ability should be recognized NOT just gifted in subject areas.	11/2/2015 12:43 PM
353	1) the new rules allow for non-certified teachers to excercise the wep. This is a disservice to gifted children. 2) This allows too much "local control" for school boards to potentially gut and underserve gifted children.	11/2/2015 12:34 PM
354	The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services.	11/2/2015 12:28 PM
355	Reinstate minimum service minutes for students from current operating standards along with caseload limits, reinstate and more carefully define service and instructional settings as provided in current standards, and remove provision that allows poorly trained or untrained general education education teachers to provide service unless it is an accelerated classroom or Honors coursework in grades 4 and above.	11/2/2015 12:26 PM
356	The Written plan my child received wasn't worth the paper it was written on. He is taking all of the advanced classes offered and is still not challenged. The school district suggested we enhance his education in the summer which we did through NUMATS. Existing rules are poorly defined and or implemented. We are moving our child from the public schools to a private school since he is not getting his needs met.	11/2/2015 12:18 PM
357	There is no indication as to the degree to which services must be provided, so that nothing at all could be considered "services" where none even exist. Also, this allows said services to be provided by individuals who are not even trained in education, let alone teaching gifting kids. This is a terrible disservice to students in Ohio.	11/2/2015 11:59 AM
358	I feel it gives districts to many ways not to service the gifted student, and to make it look like they are being serviced. .	11/2/2015 11:45 AM
359	The written portion of the gifted teacher's education should be renewed every 2 years	11/2/2015 11:41 AM
360	I will suggest including the communication of important announcements, dates for testing/identifying gifted students to families in the flexibility clause. Our school district does testing once every two years and for those who want to be tested in a year that's not typically provide testing, you can apparently request it. However, the school district never communicates that to families who want to take that route.	11/2/2015 11:21 AM
361	The quality and extent of gifted services can only be ensured if there are trained staff on-site and if the services are delivered with sufficient time and resources. The wording needs to be clear about qualifications for serving gifted: Services must be delivered by a trained staff member for superior cognitive students. A minimum of 225 minutes per week would be required for direct interaction between students and the trained gifted staff member in order for this service to be accurately reported. A strict student teacher ratio of 15:1 would be enforced. If specific academic services are delivered by a general education teacher with no licensure in gifted, then HQPD has to be documented with a minimum of 20 clock hours per year of contact time with a licensed gifted staff member. A test for teachers participating in that HQPD would be developed to ensure depth and breadth of learning had taken place. Without passage of that test, students from that teacher could not be counted as served. For rural and low income areas, services could include the top 10% performing students in that area by a trained staff member to ensure equity and access, although, student/staff ratios for trained gifted staff members would be strictly adhered to. If numbers exceeded 15:1, another teacher would need to be employed. Districts would get credit for these services but also for any other types of services offered, such as creative thinking, visual/performing, leadership, career exploration, and others. Those services could have less stringent guidelines and would encourage districts to expand offerings to many more students.	11/2/2015 10:59 AM
362	There needs to be required minutes of instruction based on their individualized needs by a Gifted Intervention Specialist.	11/2/2015 10:49 AM

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363	<p>It isn't just about a license. It's about the additional training for the staff that comes with the process of getting the special license. Teacher preparedness programs identify skills in average children. Special education training identifies the special needs of the population and provides training for meeting those special needs. Example: My son wrote a multiple page poem on his honors english summer reading assignment, "East of Eden." The written rubric didn't say underline, it said identify 4 different types of speech. Teacher 1 said to type these up on a separate piece of paper and attach it. His schedule changed and he was placed in a different English class. Teacher 2 says it's not enough, do another assignment too, in half the time. She gave him a D- on the poem because he did not underline the 4 examples within the poem. She allowed him to go back and do this which raised his grade. However, she dropped it a letter grade because it was a "re-do." Where in this example are accelerated cognitive skills being developed? This is a nice teacher with a BA in communications from Kent and a masters in school counseling. We have ten years age difference between our two sons. The oldest scored in the 99% in science and didn't have options for accelerated classes at that time. His new teacher who had a certificate in special education used him as a behavioral buffer between two kids with behavioral problems. The kids talked through her lectures and if he asked them to be quiet they smacked him up the back of the head. Now, the "gifted" programs in middle school are being accelerated into an honors class and in middle school you get an option to participate in Future City. You have to find your own mentor. Standardized tests set "cut scores" much lower that do nothing to identify learning needs for the accelerated students. Curriculum clusters around teaching to the test. It seems like a minimum request to ask you to require a teacher working with special learning needs have a gifted instructors learning license. School administrators, building principles, school counselors, athletic directors, special education teachers, reading teachers, etc., all have special certificates, licenses. It isn't just about the the piece of paper/license. It's about the training they get! It's training they don't get in college. These kids didn't ask to be born this way. People think it's such a gift but sometimes it truly isn't. Sometimes it's very lonely not having a large group of peers who think like you do. It's tough being mocked for being able to reason where other peoples' minds just don't usually travel. It shouldn't be about whether or not a kid makes a standardized cut score. It should be about their intellectual growth too. Please don't go backwards. If you look at the normal distribution of intellect you see that these kids aren't in the majority and won't have the same voice as say Mr. Husted will have when he seeks to make paying for extra curricular sports a mandate. Please don't water down what little there already is.</p>	11/2/2015 10:40 AM
364	<p>Yes, this rule provides flexibility for districts, but at the expense of quality. "An educator who has met district-determined criteria" is problematic as the "district-determined criteria" may not be rigorous enough to meet the educational needs of gifted students. Written Education Plans should not only "be developed in collaboration with a gifted intervention specialist or an educator who has met the district-determined criteria," but also in conjunction with the students and their parent(s). Parents are the first and primary educators of their child(ren) and should be included in the process. The "social and emotional needs" of the student cannot be met without the valuable input of parents.</p>	11/2/2015 10:36 AM
365	<p>Specially trained Gifted Intervention Specialists should be the only teachers to teach a gifted class. Regular teachers do not have the appropriate training to properly teach and handle gifted students.</p>	11/2/2015 10:23 AM
366	<p>It actually makes my job a good deal more difficult when ODE gives me all this "flexibility." Just tell me what I should be doing. I have no gifted background so some direction would be helpful. Gifted services aren't mandated, but shouldn't some best practice come into play here?</p>	11/2/2015 10:23 AM
367	<p>Require teachers to have gifted certification to serve the population.</p>	11/2/2015 10:20 AM
368	<p>I would argue that the proposed rule provides too much flexibility in how districts may serve gifted students. It leaves no guarantee that students will get services that match their needs. I would argue that the proposed rule does anything but clearly describe standards for the quality and extent of gifted services. It leaves the range of qualified instructors entirely too vague. Requirements 2b and 2c essentially allow anyone to be qualified if a district deems them to be within their own criteria. Next, how will you ensure requirements 3a i-vi are actually carried out? Have you seen what these current written education plans look like? They hold NO value for students or parents and are a meaningless task for the instructor. There is no accountability in how services are carried out and they are written in such a vague fashion that it renders them worthless.</p>	11/2/2015 10:18 AM
369	<p>Development of a student's Written Education Plan does not include collaboration with the student and parent -- those who are most directly affected should be included in that process.</p>	11/2/2015 10:12 AM
370	<p>2(d): All licensed teachers shall annually complete 2 hours of continuing education in gifted services. 3(a)(i) Be developed in collaboration with a gifted intervention specialist, the student's classroom instructors, the parents, and any advocate(s) brought to the meeting by the parents; 3(c) the Written Education Plan shall be reviewed annually through a meeting of the persons listed in 3(a)(i)</p>	11/2/2015 10:08 AM

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371	<p>There will be no quality of services under this draft. This rule doesn't nearly meet the intent of the law and will very likely be challenged in JCARR. There are multiple service options under the current rule. Why is it necessary to eliminate those in favor of "anything goes?" Districts may be the winners in this game, but, oh, what a price gifted students and parents pay for this local control victory. Why doesn't ODE care about the needs of gifted children? It makes no sense when it is clear how poorly served they are. Instead of local control, ODE and the state board should focus on parent control for these kids. Give gifted students vouchers and community schools and other options just as students with disabilities are given. Gifted students are increasingly an at-risk population in Ohio. This draft rule makes it worse and for no good reason. Clearly, someone dislikes this population at the ODE leadership level.</p>	11/2/2015 10:03 AM
372	<p>OAGC recommends the following: 1.Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2.Reinstate and more carefully define service and instructional settings as provided in the current standards. 3.Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4.Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5.Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6.Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	11/2/2015 9:57 AM
373	<p>The rules give districts too much flexibility which means doing as little as possible. Some options need to become requirements. Gifted students need to be allowed to flourish away from the unruliness that pervades the school systems now that we can't remove the disruptive attendees.</p>	11/2/2015 9:55 AM
374	<p>As a parent, I am less interested in being informed of the school's goals for my child. I am more interested and concerned with my child being challenged in the classroom.</p>	11/2/2015 9:52 AM
375	<p>Specialized teachers for these classes should be guaranteed. Also, there should be set guidelines for how much instruction a district should have to give an identified student.</p>	11/2/2015 9:43 AM
376	<p>The rules should require additional teaching and administrative staff necessary to implement the degree of differentiation and increased special services for those children who are TAG.</p>	11/2/2015 9:37 AM
377	<p>1. Reinstate minimum service minutes for gifted students from the current operating standards along with caseload limits from the 11.11.13 draft passed by the State Board of Education Achievement Committee (11.11.13 draft) without the sunset clause. Rationale: A consensus of research on the effectiveness of gifted education services is that service must provide an appropriate match between a student's needs and the content and level of the curriculum. Additionally, to have an educationally meaningful impact on a child's educational trajectory, services must be significant and sustained over time. Preserving the minimum time requirement in the operating standards is important to keep the state from sliding back to when students seeing a GIS for 15 minutes a week or a half day a year was considered "service," as was the case in some districts prior to the incorporation of minimum contact time requirements in the 2008 operating standards. As ODE inexplicably stopped performing on-site gifted audits last year, we already are experiencing a decline in service quality. The minimum time requirement is also crucial for supporting parents' ability to make informed choices about where to educate their children. Without minimum time requirements, districts that provide minimal "drive-by" services would appear, on paper, to be the same as districts that provide substantive and sustained programming. Additionally, many of the report card indicators and other factors for this population will become insignificant if there is no common definition of what service entails. Accountability data will be rendered useless for driving improvement, because school leaders, policy makers, and researchers will not be able to connect output data to inputs to learn what forms of service are most effective and efficient for particular kinds of students in particular kinds of districts. With regard to caseload requirements, it is critical to recognize that gifted services are necessary specifically because gifted students, like students with disabilities, have significantly different educational needs from other students that must be addressed in order for them to receive a high quality education. However, in recognition of the limited resources in districts, OAGC merely asks that gifted intervention specialists not be assigned to serve more students than the state allows general education teachers to serve. Maintaining the caseload limits recommended by the Gifted Advisory Committee ensures that gifted intervention specialist caseloads do not exceed those of general education teachers and prevent over-assignment of these educators so that they can reasonably be expected to know and understand their students and effectively support the differentiated education gifted students need. OAGC recommends that the Gifted Advisory Committee recommendations with regard to minimum minutes and caseload ratios be reinstated. These provisions generally increase the caseload ratios from current operating standards, but maintain the minimum minutes of service. The 11.11.13 draft can be used as a base to incorporate this recommendation. 2. Reinstate and improve service settings and instructional settings as provided in the general standards and adjusted in the 11.11.13 draft. Rationale: The 9.11.15 draft dismantles longstanding definitions of services and instructional settings that are necessary to guide districts toward best practice. The draft allows districts to define services and service providers any way they wish with no quality control around the appropriateness of the service, the instructor, or the instruction itself. More specifically, the service section in the 9.11.15 draft eliminates most of the service settings outlined in ORC. ODE currently tracks service codes for multiple types of gifted services. There are 22 gifted EMIS codes based on the types of services provided, which are all required by ORC. The new draft would winnow the range of service options from 22 to 3. The 9.11.15 draft appears to be an attempt to placate districts that have complained about being held accountable to the gifted performance</p>	11/2/2015 9:37 AM

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indicator. It is important to recognize that Ohio law does not require districts to provide any gifted service to gifted students. However, OAGC strongly believes that if a district reports it is providing services, then those services must be substantive and well-defined. While the clear intent of removing these definitions was to support local control, doing so may actually undermine local capacity for innovation. By removing any parameters that define a service, the proposed rule precludes any ability of local leaders, state policymakers, and researchers to track settings to determine which are effective. More importantly, removing definitions and standards for services also disempowers parents seeking to make informed school choices on behalf of their children. Other special groups, such as students with disabilities and students in danger of retention according to the third grade reading guarantee, are required to have access to services that meet specific parameters. Districts have a menu of acceptable options for serving these students and are free to create variations within these basic parameters. Operating standards for gifted students should follow a similar model. Additionally, the gifted performance indicator specifically measures the level of services provided by districts as one of the elements. By allowing districts to define what services are, the draft standards would allow districts to report settings that are not research based or substantive merely to gain service points on the gifted performance indicator. OAGC recommends that service and instructional settings in the 11.11.13 draft be reinstated with some additions to ensure that gifted students are not merely given a "checklist Written Education Plan (WEP)." There are some general education settings that are required in ORC that should also be adequately referenced by the operating standards, such as Advanced Placement, early entrance, and College Credit Plus. OAGC also recommends that "guidance," as a stand-alone service, be deleted from the 11.11.13 draft. Supports for gifted students' social and emotional development would be included as part of the WEP, so the guidance option is not needed as a separate category of service. Finally, ORC language should be included that requires districts to pay for any gifted services that are reported to ODE. 3. Remove the provision that untrained general education teachers provide gifted service unless it is an accelerated classroom. Rationale: The research strongly shows that, even with training, the vast majority of general educators teachers do not regularly differentiate instruction or curriculum for gifted students in general education classrooms. (Westberg, Archambault, & Brown, 1997; Reis & Westberg, 1994). A study commissioned by ODE conducted by Laurence Coleman at the University of Toledo reported similar findings based on surveys and field observations in Ohio schools. VanTassel-Baska and Stambaugh (2004) reported that, despite sustained good faith efforts in many schools, teachers who consistently differentiate for gifted students in general education settings are few and far between. A large analysis of academic achievement of gifted students in a variety of settings by the National Research Center for the Gifted and Talented (1994) also reported that gifted students in educational settings that did not either utilize ability grouping with other gifted students or whole course acceleration fared poorly. Gifted students receiving services in non-grouped general education settings do not outperform gifted students receiving "no service." OAGC strongly supports continued efforts to help general education teachers differentiate for gifted students in their classrooms. However, the evidence in Ohio and nationally suggests that this setting is not conducive for adequately meeting the needs of gifted students by itself. Therefore, OAGC asks that it be removed as a recognized form of "service" to encourage greater use of effective (and cost-effective) options like readiness grouping and academic acceleration. This change was already incorporated into the 11.11.13 draft. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Rationale: Gifted license and endorsement requirements adopted by Ohio were based on professional standards developed by the National Association for Gifted Children and the Council of Exceptional Children based on a comprehensive review of research regarding the knowledge and skills needed to develop effective curriculum and provide effective leadership for gifted education programs. Ohio colleges and universities that provide gifted endorsement programs are required to teach and assess the specialized knowledge and skills embodied in the endorsement standards. These standards include understanding critical developmental and learning differences between gifted and other students, advanced knowledge of assessment for identification, including how cultural and economic factors can influence how giftedness is manifested and how talent can develop, specialized curriculum design models, and research on the effectiveness of major service models with various subpopulations of gifted students. These topics are rarely introduced and almost never explored in general educator training programs. By allowing educators without gifted education endorsements to serve as gifted intervention specialists and gifted coordinators, the draft standards devalue this essential professional knowledge of trained gifted educators and remove a key incentive for districts to prioritize employing staff with the expertise needed to administer and deliver effective gifted services. Further, adopting the draft language would send a message that the State Board of Education does not recognize gifted students as a population with special educational needs. This use of unqualified professionals is not allowed for any other special population, including students with disabilities, English Language Learners, and students at risk of failing 3rd grade. Preliminary data from a new survey on the amount of training classroom teachers receive who are reported as providing services to gifted students show that two-thirds of these teachers receive less than five clock hours of gifted training. Almost 20% receive no training at all. This is no substitute for the advanced coursework received by trained gifted professionals. We have also already witnessed the elimination of coordinator services from many districts across the state. Principals, counselors, and other administrators are inappropriately assuming that title with their many other duties. Some of these individuals have no understanding of gifted students and have no ability to appropriately review the work of a gifted intervention specialist. Many are caring educators who would like to understand their new role but do not have adequate time to be trained on even the basics of identification and state reporting, let alone the more critical elements of understanding the nature and needs of gifted learners and development of appropriate curriculum. Sadly, there are also those who do not realize what they do not know and make programmatic decisions based on long held misunderstandings drawn from anecdotes and myths rather than sound psychological and educational research. Therefore, OAGC recommends

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	<p>that the gifted operating standards align with the state's gifted endorsement standards and remove the ability of districts to determine when educators are "qualified" to serve as gifted educators on their own. 5. Reinstate instruction time requirement for gifted intervention specialist from current standards. Rationale: The current operating standards require that gifted intervention specialists spend at least 75% of their time with gifted students. This provision in the current standards was to ensure that the gifted intervention specialists were actually teaching gifted children, which was a problem before the 2008 gifted operating standards were adopted. The removal of this language effectually removes the guarantee that gifted students will actually be the recipient of trained gifted intervention specialist support if the district employs staff for that purpose. There is no educational reason for this removal. Even in districts that provide great support and resources to gifted education, building administrators often turn to these teachers to pull extra non-instructional duties or lead academic intervention groups for struggling students. Teachers are pulled to coordinate spelling bees and other short term enrichment activities for select students rather than meaningful instruction designed for the population of gifted learners. Without this time requirement, gifted intervention specialists may become overpaid instructional assistants rather than fulfilling the necessary role of teacher for which they were hired. OAGC believes that the 75% rule supports the integrity of services while providing reasonable flexibility for school districts. Therefore, OAGC recommends that this requirement be reinstated. 6. Increase the scope and depth of the written education plan (WEP). Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Rationale: Because of the unique academic, cognitive, social, and emotional needs of gifted children, individuals without gifted licensure are not equipped to develop appropriately rigorous goals or select relevant instructional strategies and progress measure. It is highly inappropriate to have untrained personnel develop written education plans for gifted students. The Gifted Advisory Council recommended a number of changes to the WEP process to strengthen them. The draft standards approved by the committee on 11.11.13 incorporated some of these changes. OAGC recommends reinstating the language from the 11.11.13 operating standards draft with the additional provision that districts shall attempt to obtain a parent signature as well as a provision supporting the social emotional needs of gifted students that is included in the 9.11.15 draft.</p>	
378	<p>Gifted students that are included in the gifted teachers which needs to be stated in each child's WEP. Schools need to provide these services just as they do for other specific identified students (504, IEP, ESL, etc.)</p>	11/2/2015 9:32 AM
379	<p>While flexibility can be a good thing , there needs to be safe guards so gifted services aren't "flexed" out of existence esp in districts with limited resources</p>	11/2/2015 9:28 AM
380	<p>There is no criteria for what will constitute a qualified instructor for gifted students. We need to help these talented students accelerate learning.</p>	11/2/2015 9:09 AM
381	<p>The teachers and intervention specialists providing gifted services need to be certified in the same way that providers of other special needs students are required to be certified. Without that requirement, in attempts to cut costs in strained budgets gifted teachers could be uninformed about the special needs, qualities and potentials of Ohio's gifted children. This would be a tragedy for Ohio's gifted children. The children that can raise district and state test scores and, help our state and our country compete in the competitive global marketplace where we are currency falling behind. Please set the bar high!! These kids deserve it.</p>	11/2/2015 9:06 AM
382	<p>Gifted services should be mandatory for all age groups and should be provided by a teacher certified in gift education.</p>	11/2/2015 9:05 AM
383	<p>Standards for quality and extent of gifted services are not adequately included in this new draft. These changes represent an enormous step BACKWARDS for US education!!!! As a country, we need to develop individuals with a range of talents to function as a society in the modern world. We need people to collect garbage and dig ditches on one end of the spectrum and people who can prevent cyber-attacks and design new antibiotics and cancer therapies on the other end of the spectrum. This proposed legislation seems to have the goal of achieving mediocrity for all. This result is the opposite of progress and evolution of our society.</p>	11/2/2015 8:57 AM
384	<p>There needs to be a minimum standard set for how kids are served. Handing a gifted child an "enrichment worksheet" is NOT providing services, whether a district would like to tell you that or not. These kids need to be served by educators who are LICENSED to serve Gifted populations. That is not mentioned anywhere in this.</p>	11/2/2015 8:51 AM
385	<p>This allows for so much flexibility, I believe that services may be compromised depending on how the school district proceeds with providing "services". I do not believe that this will assure that the gifted students educational needs are being met.</p>	11/2/2015 8:48 AM

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386	<p>The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. I recommend the following: Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards. Additionally: In essence, this rule effectively eliminates my chosen profession and completely undermines education in itself. How are we as a society expected to thrive and grow if we are not advocating for and supporting the needs of ALL learners? By allowing this rule to go forth as written, those that approve it are justifying a "We'll do what we can when we can" attitude for school districts versus a "Let's do everything we can for all learners."</p>	11/2/2015 8:47 AM
387	<p>Minimum requirements of time and quality must be defined, or these children will not receive needed services. Districts will choose to reduce gifted services whenever fiscal decisions are considered.</p>	11/2/2015 8:33 AM
388	<p>We need qualified, licensed educators to teach our gifted students.</p>	11/2/2015 8:28 AM
389	<p>I strongly disagree with taking away the requirement of a gifted intervention specialist. These kids deserve a degreed professional equipped to service their needs. Districts must serve gifted children just as they serve challenged children. Please stop taking away services for all of our children. They are our future. If you continue the path the ODE is currently on, all of us will suffer. Stop taking additional funds from our schools and putting them into charter schools. Fix how school funding is calculated (has been found unconstitutional, more than once) so we are not skimping on what should be Ohio's #1 priority - what is best for our children.</p>	11/2/2015 8:22 AM
390	<p>see aforementioned question. This is too broad and the children will be exploited. Districts who have administrators who do not understand the gifted population will be marginalized. It is already happening.</p>	11/2/2015 8:20 AM
391	<p>I'm nervous that a "district approved criteria" for teachers to meet might water down the delivery of high level curriculum to gifted students. Gifted is a specialized group and needs a specialized teacher.</p>	11/2/2015 8:13 AM
392	<p>Educators should be required to maintain gifted education certification not "...district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students..." Also, rather than a requirement to "Specify policies regarding missed assignments and testing while participating in gifted services provided outside the general education classroom and:.." the policies should specify that the students are not required to complete the missed assignments as long as similar material is being presented to the gifted student. (In other words requiring a gifted student to complete worksheets or writing exercises that he/she has comprehended in the gifted studies areas is simply requiring the child to complete additional work that is not required to learn the subject matter)</p>	11/2/2015 8:13 AM
393	<p>While the rules provide ample flexibility, it does not protect the quality of the services provided by requiring gifted certification to those providing services. My daughters are considered 'served' because they have a template WEP that does not say anything about how the services effectiveness is to be measured (e.g. Student will show higher order thinking). Two daughters, two different grades, identical WEPs. The teachers are being 'trained' but the GIS was not differentiation, clustering, or any other true service is happening. Through above grade testing (ACT), it was evident that my daughter did not have any academic growth between the 6 and 8 grades. Three years with no growth.</p>	11/2/2015 8:10 AM
394	<p>I think that 2) b) which says that the district determines the criteria on who has sufficient knowledge does not give enough check and balance. Gifted Children don't just need advanced subjects. They need someone certified in how they learn and how their minds work. Gifted Children are different and educators that are not certified may or may not understand the differences.</p>	11/2/2015 8:03 AM
395	<p>Everyone learns differently, we need to teach kids the way they learn not to a specific test. Research has shown testing does little to help any kid learn better</p>	11/2/2015 7:25 AM

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396	It should require that a teacher is certified for gifted services. No other options should be permissible. Guidelines should be better define minimum requirements to meet standards for all schools in Ohio.	11/2/2015 7:23 AM
397	Schools are going to use this as an excuse to cut services to gifted kids, under the umbrella of "flexibility".	11/2/2015 7:14 AM
398	I disagree with each district being able to determine who shall provide gifted services. Gifted intervention specialists should be certified in gifted intervention through an appropriate governing body. IF my special needs child was receiving services from a non-certified interventionist I would not be pleased. Because both gifted and special needs students fall under the Office for Exceptional Children, the certification of intervention specialists for both should be necessary.	11/2/2015 7:00 AM
399	Too much flexibility results in programs with "holes" and watered down instruction and opportunities. Districts can get by with minimal programming at all levels.	11/2/2015 6:53 AM
400	This rule allows for plenty of flexibility but seems to set no minimum service levels. It seems to allow a major loophole where the district could create a crappy program with no benefit to the students and claim that they have met the state's rule on gifted services.	11/2/2015 6:38 AM
401	INCLUSIVE services should be the standard for k-8. The alternative should be grade-jumping. Pulling students out of class or segregating them in separate classrooms or buildings serves no purpose other than soothing a parents need for their children to be recognized as "special." Inclusive services have the potential of "floating more boats" by capturing more students in the classroom by differentiated instruction. Resources are better used assisting all teachers and lowering all student:teacher ratios.	11/2/2015 6:33 AM
402	There are too any students in the gifted program where we accelerate services provided to them by simply using the next grade levels curriculum. This results in a gap in knowledge for the students as their are skills and concepts that they have not been exposed to. Believe that when you are gifted and you are in 4th grade, you should be working on 4th grade standards, but with differentiated instruction based on the student levels, not just simply using the next grade levels materials.	11/1/2015 5:34 PM
403	Seems as if the options are narrowed down from all the options we currently have. I really want to do the right thing for these students so maybe ODE could be more specific.	11/1/2015 2:06 PM
404	This section is a complete joke. It gives all power to superintendents and none to parents and students. This is a disgrace and would never be tolerated for special ed students. This section needs a complete rewrite with standards for what services really are. Districts should not be able to define them. By the way, where is the personnel section? Would ODE allow districts to decide who is qualified to teach math or reading? No, there are specific guidelines. This is horrible.	11/1/2015 1:52 PM
405	The proposed rule totally guts the provisions for high quality service delivery by allowing local districts to determine who is qualified to provide service according to their own standards. In the district I serve, the junior high school using this model achieved a gifted service value added rating of F for the last two years. It simply does not work! Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/1/2015 12:08 PM
406	Service should be accessible by all identified students, if not, what is the purpose of identifying them? Just to know why they are bored in class?	11/1/2015 10:26 AM
407	See previous comments.	11/1/2015 10:14 AM
408	Districts should be required to hire a qualified person or persons to provide specified instruction to gifted children. Classroom teachers should not be expected to provided this specialized instruction as many are not trained or have been minority trained. I think the law should be more specific with less options so districts will not just push this instruction off on classroom teachers!	11/1/2015 7:41 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

409	<p>2 B is a major concern. As a teacher who recently completed coursework and received gifted licensure, I know how much I learned in that coursework. The fact is that most teacher prep programs contain little to NO training directed towards the needs and teaching of gifted children. As a conservative Republican, I fully appreciate the desire for local control, BUT I am VERY concerned that districts will use this language to put anyone (a new inexperienced teacher even) in these positions. This language leaves that door wide open. The license is there for a reason. This proposed change ignores that. I see no limits to class size for pull-out programs or number of minutes of service per week included: that has all been removed. Districts could slash services without some guidelines on these matters. At the minimum, I hope that a GIS will need to be assigned to the child and work with them either in a pull-out program, or team-teaching type of program (with regular classroom teachers) to insure that needs are identified/met. A GIS cannot service hundreds of students, however: they need to get to know their students by working with them, so some kind of load limit should be included, as it was before.</p>	11/1/2015 5:22 AM
410	<p>I don't like the idea that a district can determine who is qualified to provide gifted services (if that person isn't licensed). This isn't keeping with best practices and wouldn't be accepted for students on the other end of special education.</p>	10/31/2015 7:56 PM
411	<p>Set minimum contact hours for the student to work with a GIS.</p>	10/31/2015 1:43 PM
412	<p>Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	10/31/2015 11:13 AM
413	<p>The rule is way to vague and does not clearly outline services for gifted students. Flexibility is needed, but not to such extremes. Having the rules outline minimum requirements around service times and teacher qualifications would strengthen the rules considerably.</p>	10/30/2015 4:56 PM
414	<p>The propose rule provides entirely TOO MUCH flexibility. A district could say that if a teacher can recite the alphabet from z-a with no errors, then they could be qualified to teach gifted. Reinstate a minimum of service minutes and caseload limits More carefully define service and instructional settings Require gifted training/licensure for teachers providing direct service to gifted students Require gifted intervention specialist or gifted coordinator collaborate with regular education staff on writing of Written Education Plans</p>	10/30/2015 3:13 PM
415	<p>The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself.</p>	10/30/2015 3:09 PM
416	<p>The proposed rule eliminates all quality parameters for service including case loads, minimum levels of service and even the definition of service itself.</p>	10/30/2015 3:08 PM
417	<p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	10/30/2015 2:12 PM
418	<p>Gifted services should be taught by a professional licensed in the area of gifted.</p>	10/30/2015 11:50 AM
419	<p>I strongly disagree that the rule provides flexibility in how districts may serve gifted students, because it doesn't provide any parameters for what the gifted services actually are! I strongly disagree that the standards provide for quality and extent of gifted services. There is no mention of what the research suggests is the minimal amount of hours needed to be serviced in order to have a positive impact on a gifted education program. I am also disturbed by the notion that an "educator who has met the district-determined criteria" may teach gifted students. Students MUST be serviced by educators licensed in gifted education! No Ohio teachers or administrators have any required coursework in gifted education in their undergraduate or graduate studies, so how can they make service determinations without the necessary background knowledge?! Unless the school district specifically assigns someone licensed in gifted education to handle this portion of the proposed rule, then gifted children are at the mercy of uninformed decision making regarding their education. Also, as a parent, I can tell you that a proposed rule that is as ambiguous as this one is with respect to quality and extent of gifted services runs the risk of having well-meaning, but untrained educators developing programs that rely heavily on additional breadth of paperwork (i.e., busy work) versus critical depth of content (i.e., effective enrichment and authentic gifted service) for the TRULY gifted, not just the academically talented.</p>	10/30/2015 11:48 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

420	<p>Scap the whole thing! This is terrible! The creators of this document lack understanding of the nature and needs of gifted students as well as the purpose of a well defined Operating Standard. You have taken something that is meant to be a fine dining experience and created a fast food drive thru. Along with changing the menu of available services, this will reduced the quality of the EDUCATORS preparing the instruction. Similar to the fine dining analogy, you are willing to compromise quality for cost. Foods that are convenient and cheap are unhealthy and have unintended consequences. This proposal will kill gifted education in Ohio. Section 1- Define "objective data". This is a broad term that can be used to include any tests or assessments regardless of their purpose or validity. Change "curriculum MAY be adapted" to "Curriculum SHALL be adapted". Service Provider should be changed to EDUCATOR. If a Non-Educator is working with a gifted student, a licensed GIS or GC shall collaborate on a regular basis in proportion to the time spent in a mentorship, leadership program, etc. Remove all references to "Service Provider" - we are EDUCATORS. Define the diverse and effective practices. How will effective and diverse be defined? It should be defined according to best practices as established by the body of research that is specific to gifted children. By establishing these general descriptors "readiness, interest, learning profile and range of learning needs" AND eliminating the Gifted Intervention Specialist as the primary EDUCATOR, much harm will be done to some of the most vulnerable population of gifted students. Has anyone at ODE read the profiles on school shooters? They are described as BRIGHT, capable students that DIDN'T fit in. These boys weren't interested in school and schools did nothing to change that. Smart children are allowed to fail because they are "not interested", when in fact administration did nothing to ensure the students could receive appropriate curriculum adjustments. School failed them. You have removed specific language for school counselling and social emotional support in place of a list of general terms that will give administrators the permission to deny services because of lack of readiness or interest. Many times I hear from classroom educators that children must PROVE they can do advanced work by doing their regular work first. Why do children have to prove themselves worthy? Shouldn't they get what they need? Section 2- I can't wrap my head around this section. You are in effect giving districts the option of eliminating an EDUCATOR with specialized instruction (Gifted Intervention Specialist) in exchange for a service provider. The individual DISTRICT gets to determine the type and amount of training necessary to provide QUALITY instruction for the state's top students, when ODE has already set the criteria for a Gifted Intervention Specialist Licence? Are the same changes being offered for students with significant cognitive delays? I find it discriminatory that students with the same statistical pattern for exceptional abilities and special needs will be DENIED access to a gifted intervention specialist. There are reasons fast food cooks are paid \$10 an hour to make \$2 cheeseburgers and an executive chef is paid \$22 an hour to make \$50 steak dinners. Gifted Services MUST be provided by a GIS licensed EDUCATOR. In the case of credit flexibility or mentorships and alternative options, the service provider MUST consult with a GIS or Gifted Coordinator in proportion to the time the student spends in the program. Section 3 - The recommendations in this section are pointless because of the unintended consequences of the previous sections. The unintended consequences of eating too much fast food are obesity, high blood pressure, and diabetes as well as the environmental impact of deforestation and the use of chemicals and hormones in food products. If a district wants cheap, convenient services, there will be no GIS left in the district for collaborative opportunities. Welcome to Ohio's McGifted Services: Cheap and convenient opportunities for Ohio's most capable learners.</p>	10/30/2015 11:29 AM
421	No	10/30/2015 11:24 AM
422	There are not minutes for service requirements. A student could be served with 30 minutes per week or 300 minutes per week. There needs to be a reasonable minimum number of minutes per week.	10/30/2015 10:44 AM
423	The importance of a qualified, trained individual to services the gifted child has been overlooked.	10/30/2015 10:38 AM
424	We agree with the OAGC statement "The proposed rule obliterates all standard of quality services.	10/30/2015 10:26 AM
425	Regular classroom teachers should be providing differentiated instruction already in their classroom on a daily basis. Gifted teachers and special gifted classes, take that differentiation one step beyond what a regular classroom teacher can do when there are 30 kids in a class period.	10/30/2015 10:07 AM
426	Minimum levels of service should be included such as a certain number of minutes or hours per week, location of services, and having a licensed gifted intervention specialist deliver the services. Students who are identified as gifted deserve to receive appropriate instruction that cannot be delivered in the regular classroom setting with students that have a wide range of abilities. They can, however, receive this instruction in a resource room with a gifted intervention specialist providing instruction.	10/30/2015 9:43 AM
427	Are you kidding? Particularly in the elementary grades K-6 or K-8 (depending on school structure) it is absurd to have gifted learners served by individuals who do not have a valid license endorsement certifying that they have mastered the knowledge, skills, attitudes, and behaviors necessary to understand the needs of gifted learners and deliver appropriately advanced and differentiated instruction for this special population. Do you allow teachers without an LD/SpEd license to provide services to special needs students on the other end of the achievement or ability spectrum? Of course not! In the upper grades, while this endorsement is ideal, advanced content knowledge in the advanced/honors/gifted class may be more important and can be provided by a subject specialist with additional professional development and ongoing support around the social-emotional and educational needs of gifted learners. The rule must require that direct service to gifted learners be provided by teachers with a gifted endorsement to their license.	10/29/2015 8:01 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

428	While the proposal does provide flexibility, I believe that it does not ensure quality of services. I serve as an intervention specialist for both students with disabilities and students who are gifted and talented in my district and I am certified to do both. Just as teachers who serve students with disabilities should have special training to be most effective in their roles, so should teachers who work with gifted and talented students. I believe that allowing districts to decide who is qualified to provide gifted services may lower the standard and place teachers in a role for which they are not properly trained. I also fear that this may lead to classrooms made up too wide a range of student abilities to differentiate effectively and meet all learners' needs.	10/29/2015 7:11 PM
429	Specify when a student is eligible to advance to the next grade material to ensure the standards at the current grade have been met prior to moving on.	10/29/2015 3:44 PM
430	any guidance for meeting "district criteria" to provide gifted services.	10/29/2015 3:18 PM
431	The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. Please reinstate the minimum service minutes for students with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESC's. Reinstate instruction time for gifted intervention specialists from current standards.	10/29/2015 3:17 PM
432	I did not see the explicit statement that gifted services are required. That requirement changes my response if funding doesn't follow.	10/29/2015 12:55 PM
433	Reinstate minimum service minutes and caseload limits, reinstate and define service and instructional settings as provided in the current standards, remove the language that allows ANY general education teacher to provide service, reinstate gifted coordinator and intervention specialist qualifications, require that a gifted coordinator or gifted intervention specialist collaborate on writing of WEPS, and reinstate instruction time requirement for GIS from current standards.	10/29/2015 11:58 AM
434	With the new report card indicator, there is no quality left to service. It is important to have at least one licensed gifted teacher in a district - gifted students really do have special needs.	10/29/2015 10:36 AM
435	Reinstate minimum services minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development.	10/29/2015 8:43 AM
436	No, but I LOVE the flexibility in 2B and 2C, which would allow Districts the local control to designate teachers for gifted students who meet the requirements to teacher dual enrollment and CCP courses. Districts want to be able to offer services to gifted services, but the old operating standards made it very difficult to provide services given the staffing constraints enumerated in the standards.	10/28/2015 9:00 PM
437	This change takes the meat out of gifted education. Currently there are parameters that hold districts accountable. The change allows unqualified staff to work with this population. In addition, the time requirements are needed to ensure that these students are being given the proper instruction for their needs. Fifteen minutes a week is not enough time. They are gifted all of the time.	10/28/2015 8:54 PM
438	Unless it is on a temporary basis, the lack of defined HQPD is a concern based on the idea that the person providing services does not have to be a certified GIS. There is a lot of important knowledge gained through GIS certification, and the person assigned to providing services should be required to either be a trained GIS or be receiving a DEFINED HQPD in order to best serve our students' needs. Also, there need to be more specific requirements for the amount of time spent providing service to students, otherwise districts may only provide 20 minutes a week during enrichment time and call it service.	10/28/2015 8:22 PM
439	Too much flexibility is given with the proposed changes as no trained personnel are required to work with the gifted students. Licensed personnel are needed as they understand how to meet the individual needs of the students. Unlicensed personnel are not able to define a plan that will address breadth, depth, complexity, differentiation, or WEP goals. Minimum minutes and class loads are necessary otherwise a class of 100 could meet for 30 minutes a month and that would be considered a service. Districts can be very slack in setting their criteria for an educator. No consistency across the state of Ohio will occur. We fought for consistency and are now sliding backwards.	10/28/2015 3:34 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

440	<p>1. Provide clarification that a general education teacher can provide only if they are working with a gifted expert who can provide examples and ways of taking their specific content knowledge deeper using best practices for high achieving students. My practice has shown that many of these teachers think the high kids will be fine, or, once I begin working with them are amazed at the level of work these students can produce when given the challenge and opportunity! 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 4. Increase the scope and depth of the written education plan and require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 5. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	10/28/2015 3:29 PM
441	<p>Without specific service guidelines, we would be taking a giant step backwards (into the hallways and closets where gifted students would get "gifted" education whenever they had a few extra minutes). I can't imagine special education not having any service criteria and guidelines...that would be unethical! Gifted education is special education, and therefore needs guidelines for service. I find it offensive to my advanced educational training and certification to now think of allowing general education teachers (with district determined criteria - what is that??) to provide gifted services. Would general education teachers (with district determined criteria) be allowed to provide services to identified special education students? I think not. So why is it OK to consider it for identified gifted students?</p>	10/28/2015 2:28 PM
442	<p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 15 minutes a week could be service if these "standards" that lack any standards are put in place. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. Look at the 22 EMIS codes currently allowable for reporting a service. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Keep the quality!! The licensure means something and we ODE does not lower the level of quality personnel for any other student population. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	10/28/2015 12:49 PM
443	<p>I think the kids should be allowed to advance as fast as they want to and are able to.</p>	10/28/2015 12:26 PM
444	<p>The quality of services received is not specified. If cluster grouping of gifted students can include a classroom where they are paired with high achieving students many districts will stop there. They need more than to sit in a room with high achievers. That is not enough to meet their specific learning needs. They have a right to be challenged and make gains in their progress each year.</p>	10/28/2015 11:34 AM
445	<p>A regular classroom teacher must be able to serve gifted students. There are too many identified students in our district and only two teachers certified as gifted intervention specialists. The rule is unclear.</p>	10/28/2015 11:09 AM
446	<p>The proposed rule is not prescriptive of what services will be offered, only what services can be offered. There doesn't seem to be a minimum standard of services (e.g. number of hours per week) in the rule.</p>	10/28/2015 10:38 AM
447	<p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	10/28/2015 9:59 AM
448	<p>The regulations on services are going to mandate these gifted students be given instruction by certain qualified individuals. If teachers are teaching and differentiating their teaching, these students should already be "receiving services." Creating a mandated policy that includes a gifted intervention specialist or district approved gifted teacher is going to seclude these students during their educational setting.</p>	10/28/2015 9:19 AM
449	<p>This proposed rule leaves the quality of the gifted service and the training of the teacher providing services entirely at the discretion of the district. With no way to ensure the quality of gifted services to students, how can we call something a true service to children? The purpose of Operating Standards is to create to standard of excellence. This proposal eliminates minimum standards for gifted education, and in doing so, puts the quality of gifted services at risk, undermining decades of efforts to create valuable services for gifted children.</p>	10/28/2015 7:55 AM
450	<p>How frequently should plans be reviewed by districts? Should parents be given an updated plan each year?</p>	10/28/2015 7:28 AM
451	<p>Districts should always be using Gifted intervention specialists to be working with gifted students. It should be mandatory in order to provide the best educational services to our students.</p>	10/27/2015 10:56 PM
452	<p>No</p>	10/27/2015 10:55 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

453	If we as a State wish to differentiate and truly serve gifted students districts need to be required to identify students as gifted (at least Cognitively Gifted) and need to be required to serve them with the full support of State dollars. If not, this entire proposal is a waste. Schools identify and do not serve. Schools identify and ask for waivers to not fully serve students or in some cases are so far out of compliance that the program is meaningless. No teeth...no service...as districts look at finances for dollars not required to be spent. There is a moral obligation to serve students where they are...IEP, 504, typical, gifted.	10/27/2015 7:53 PM
454	No.	10/27/2015 6:53 PM
455	Sure there is flexibility but that is because there is NO criteria for a quality program. What is to stop my district from determining that anyone is qualified to administer service and that service could be a pack of worksheets? With no guiding specifics for districts it will be a free-for-all and gifted kids will be forgotten in the mix all because it's cheap to go with no "real" service. This is a slap in the face to every gifted child in Ohio.	10/27/2015 3:56 PM
456	There's NO criteria for districts! There are NO outlined standards for the quality of gifted education.	10/27/2015 3:54 PM
457	There are no outlined standards for the quality of gifted education.	10/27/2015 3:54 PM
458	YES Gifted falls with Special Education in the big picture. So, for a student to receive services only a GIS should be the one one giving the services. Just like the intervention specialist are the ones who give the services to the IEP students. Those teachers have the special training and so do the GIS teachers. So, why do one different than the other? These two should be treated the same. We are just taking about each end of the spectrum. So, whatever is good for one end should be good for the other end, it should not matter if they are grades ahead or grades behind both need special services.	10/27/2015 3:38 PM
459	Although it provides flexibility to districts, it does not provide quality services for students. There are no parameters and therefore - anything is service. Is this how special education services are provided? Why are gifted students' education of such little regard? This will exacerbate the lack of service in poor and struggling districts. Only the wealthiest school systems will even think about gifted education.	10/27/2015 3:25 PM
460	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/27/2015 2:51 PM
461	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/27/2015 2:51 PM
462	I strongly disagree with section C -2b. and section C - 3ai. Allowing districts to determine who is qualified to provide gifted services and write WEPs is absolutely not in the best interest of gifted students! The wording of this rule requires no gifted background or understanding of gifted needs. The district can set whatever parameters they choose for someone qualified to serve gifted. I can't imagine this being allowed in any other area of education. Gifted students have special needs and those must be addressed by educators that have been trained to understand their needs and have shown their dedication to make sure gifted children receive an appropriate education. This rule "muddies the waters" of what includes gifted services and has eliminated rules that should be included such as minimum levels of service, caseloads, and what actually can be counted as gifted services. The following needs done 1) Reinstate qualifications for gifted coordinators and who can provide gifted services and write WEPS. 2) Reinstate and more carefully define service and instructional settings as provided in the current standards. 3)Reinstate minimum service minutes for students from current operating standards along with caseload limits.	10/27/2015 1:41 PM
463	Clearly define service and instructional settings such as those in current standards. Provide minimum service minutes and caseload limits as included in current standards. Remove provision allowing untrained general classroom teachers to provide service with the exception of an accelerated classroom placement. Include requirements for more personalized Written Education Plans with plans being overseen by GIS and/or gifted coordinator. Include guidelines for GIS and gifted coordinators to receive high quality professional development.	10/27/2015 1:41 PM
464	What grades are included in this? Is it all K-12? It wasn't clear to me.	10/27/2015 11:58 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

465	We need educated teachers who have studied gifted students to serve them. Most teachers in the regular classroom have little to NO gifted education in their background.	10/27/2015 11:29 AM
466	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/27/2015 10:54 AM
467	Expand the definition of quality and specify extent.	10/27/2015 10:43 AM
468	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/27/2015 10:43 AM
469	OAGC concerns: The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. OAGC recommends the following: Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/27/2015 10:38 AM
470	Our district identifies, but does not provide any extra services in the elementary grades. The law as stated mandates identification but not services.	10/27/2015 10:14 AM
471	I am worried that the emphasis has been taken off having a qualified intervention specialist and replacing them with someone who receives some training.	10/27/2015 9:19 AM
472	No	10/27/2015 8:34 AM
473	I would like to see the rule require that the WEP identify how progress with be measured and require parent input in the development of the WEP	10/26/2015 10:44 PM
474	Who is authorized to provide the service is thoroughly covered. That the services are ongoing for the duration of the course and an equal opportunity to access the service/ course is offered is clear. What is not clear is what makes "quality" service. Is enrolling in the advanced or honors level of a course sufficient gifted service? Gifted students often have more than just academic rigor as a challenge that needs support. I'm thinking of personal and social growth, too.	10/26/2015 7:27 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

475	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/26/2015 5:15 PM
476	The proposed rule obliterates all standards of quality service so it is impossible to answer this question.	10/26/2015 3:02 PM
477	Please maintain the current accountability measures for minimum gifted service and caseload limits. Please strike the proposed revision that loosens the requirements for personnel who are eligible to serve gifted students. Please support gifted students in Ohio and do not loosen the current requirements or water down the current law.	10/26/2015 2:54 PM
478	One can't have a standard without any standards. Flexibility is great and other proposed drafts of gifted standards provide choice. This proposal is a free for all. It isn't nearly as important that district needs are met as it is for student needs to be met. This appears to be all about what the district needs. Children are at the mercy and whim of whomever has the power. In addition to not providing for the immediate needs of students, this proposal will not provide any quality data to help determine which service models best promote student growth over time and in a variety of different districts.	10/26/2015 2:39 PM
479	This new proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are only three choices for types of service~ unlike the many options in the current rule. Also, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided, or not, with professional development, likely the allotted 5-6 hours required by a district each year. The proposed rule allows districts to define services, define who is qualified to provide services; therefore it allows districts to tally up points on the gifted performance indicator, making it a useless measure. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. IT TAKES AWAY THE LEARNING OPPORTUNITIES FOR THE GIFTED STUDENTS!	10/26/2015 2:19 PM
480	District appears to have complete discretion over who can provide gifted services. Families should be protected by mandating that gifted services are provided by someone with specific training and certification in gifted. Too broad on what can be considered a gifted service.	10/26/2015 2:16 PM
481	The proposed rule offers ideas about gifted services but doesn't speak about quality/extent specifically; I feel that there's not a lot of flexibility in how districts serve gifted students.	10/26/2015 2:04 PM
482	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/26/2015 1:19 PM
483	Should be explicitly written: A student's IEP or 504 follows him/her while receiving gifted services.	10/26/2015 12:56 PM
484	Add (or re-add from the previous operating standards) specific definitions of "service". Provide more specific guidance on what is considered sufficient high quality PD to provide Gifted services if they are to be provided by a non-GIS. This is coming from someone who, despite my limited knowledge of Gifted and certainly without GIS certification, was asked to oversee the Gifted program in my district. I recognize that the expertise of a GIS or someone who truly does have enough understanding of Gifted children's needs to be involved in making educational decisions for these students, particularly at the instructional level. The Proposed Operating Standards do NOT provide "flexibility" in SERVICE; they provide flexibility in what you can CALL "service", even if it is not necessarily meeting the needs of those students. The proposed rule may address the quality and extent of gifted services, but it by no means describes true "standards" to be upheld.	10/26/2015 12:34 PM
485	The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. It does not meet the quality or extent portions of the rule. How is any of this providing students with exceptional needs the services they require to be successful?	10/26/2015 12:29 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

486	<p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	10/26/2015 11:47 AM
487	<p>The language used here is ridiculously vague. Using "district-determined criteria" leaves far too much to be determined on a case-by-case basis. No other population is subjected to services based on "district-determined criteria" - we need to ensure that gifted students receive the support they need, and this vague language won't do that. Where are the details regarding parameters such as caseloads, minimum service levels, and definition of service? How would leaving so much up to chance allow us to properly measure the effectiveness of districts/teachers/strategies when it comes to gifted learners?</p>	10/26/2015 11:28 AM
488	<p>While this rule provides flexibility for serving students, it has created an issue with the quality and extent. For example, one district may choose to serve all identified students by having regular education teachers serve and another district may say they are not serving because they do not have gifted intervention specialists. It leaves too much to interpretation.</p>	10/26/2015 11:18 AM
489	no	10/26/2015 10:54 AM
490	The lack of minutes is huge and there is no real accountability unless times are put in for different options.	10/26/2015 9:58 AM
491	<p>The new standards took out the parameters for service such as caseloads, minimum levels of service, and the definition of service. This is too vague! There needs to be a minimum service minutes for students as well as a caseload limits. A more clearly defined definition of service and instructional settings. We cannot allow untrained general education teachers to provide gifted services for our students. That's like allowing a general education teacher to go into a self contained SBH room, it won't work! There also needs to be instruction time requirements put back in to the new standards for the GIS.</p>	10/26/2015 9:49 AM
492	<p>Gifted students learn differently than other students. Therefore, they need services directed at their special needs. This is best provided for by trained educators. Gifted certification should be required for teachers working with gifted students. Allowing local school boards to determine their own criteria for teachers serving gifted students will not ensure that gifted students have access to educators trained to meet their needs.</p>	10/26/2015 9:43 AM
493	<p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	10/26/2015 9:30 AM
494	By having the District determine qualifications allows too much choice. You are either trained or not trained to serve as a gifted educator.	10/26/2015 9:28 AM
495	<p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	10/26/2015 9:24 AM
496	<p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	10/26/2015 9:22 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

497	I am concerned that my child may not get enough time with the gifted teacher under the proposed rule. With caseload minimums removed, the gifted teacher may not be able to give quality services to all of the kids served. Removing the requirement for a trained gifted teacher is a step backwards in gifted education. I want a trained teacher who understands gifted needs to provide these services.	10/26/2015 9:19 AM
498	Gifted services should be provided by someone certified to deliver those services. I feel that these changes are designed to allow districts to claim that they are providing services when really it is just someone that wants the "high" kids. This appears to be an effort to remove professionally certified individuals in favor of stand ins. The services and funding should support certified staffing and professional development.	10/25/2015 11:12 PM
499	I have one gifted child and one almost gifted child who is receiving differentiated services. There is a HUGE difference in the quality of the education. The gifted child is consistently challenged the same as all the others in her class. The learning centers are with equally able children and the gifted child is not expected to teach her classmates. My other child receiving differentiation normally receives MORE work than all the other students in the same class. That child is keenly aware that the reward for quick learning is just more work! So, that child has realized that working slower means less work. This child is normally bored in class and not working with equally abled children. This differentiated child is expected to help others and/or carry the load for group work rather than focus on her own learning and growing. I also did not notice minimum time requirements for gifted children as well as the requirement that the services be provided for all levels. There is also no transportation requirements if the program is not housed in the same school building. Currently, the gifted students get to school late and leave early thus some miss 50 minutes or more in the morning as well as 50 minutes in the afternoon. The gifted services should be equal for all students!!	10/25/2015 8:34 PM
500	I believe that our district will take steps backwards, rather than forward and my child will be offered a service that is not fair or appropriate. Why do the gifted students always lose out?	10/25/2015 8:02 PM
501	District determined criteria for gifted instructors is not sufficient. We have criteria that determine eligibility to work with special needs children, gifted children are also special needs. To have unqualified personnel instructing the gifted can do more harm than good.	10/25/2015 6:43 PM
502	should have option to include after school esp for performing arts	10/25/2015 1:13 PM
503	1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/25/2015 12:34 PM
504	Rule is too vague and again, where will the accountability come from? In Olentangy there is a plan which is touted as a specialized program for gifted in which our district claims to have almost half of its student population identified (achievement only). However, statistically its impossible to have this many actual cognitively gifted students. General population has top 5-10%. The district blends the two groups together (Cognitive = Direct Service and Academic Achievement = Indirect Service) this is not a true gifted services program and seems falsified. Regarding the WEP, there should be very specific rules in a separate place for how, when and who is responsible for putting it together. Again, in our district we are into the 2nd grading period with no sign of a WEP in place for our students (nor for my middle school child) with no accountability. What good will it do to have a written education plan for only a portion of the year. The plan was never used elementary and was hardly ever updated. More of a cut/paste process. If the state requires it be done, lets make sure its actually completely properly and USED for the students like an IEP and 504 plan.	10/25/2015 11:51 AM
505	N/A	10/24/2015 9:21 PM
506	All quality parameters have been taken out of the proposed standards. Time requirements and maximum caseloads need to be included. Differentiation and enrichment are such general terms that without more specific guidance anything could count. Finally, the staff members need to be gifted certified. We would not allow a district to designate a staff member to teach special education if they were not certified, why would we allow the same for a gifted student. By giving such vague terms and no quality measures, the quality of service would drastically vary from district to district. How is that fair to a student who lives in the district that provides no service? Keep the requirements of time, caseload, and gifted certification in the operating standards. If we want the gifted performance indicator to mean anything, it needs to have specific quality indicators written into the standards.	10/24/2015 5:17 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

507	<p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	10/24/2015 1:09 PM
508	<p>Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development.</p>	10/24/2015 12:24 PM
509	<p>The increased flexibility to my district will definitely result in more students being served in areas where they are not currently being served. I can't speak for every district in the state but in my district, the quality of the service will be the same or higher despite not having a formal gifted services teacher.</p>	10/24/2015 11:16 AM
510	<p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	10/24/2015 10:02 AM
511	<p>I'm not for unfunded mandates, but I wish gifted kids received more. They have unique needs. Many would benefit by being around other kids like them, so I wish there were more opportunities for them to have special classes at least part of the time.</p>	10/23/2015 11:50 PM
512	<p>It does not cover the quality and extent of services. For instance, it calls for (twice) "an educator who has met the district-determined criteria" for someone to guide a gifted student. This is not a controlled standard that a higher check is in place. I.E. the district can authorized any criteria for the person "that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students". This is not based on a specific criteria that can be challenged by the ODE or some other outside agency to make sure that the school district is assisting the gifted student. It says "Criteria for gifted services shall be based on objective data." WHAT objective data? Data determined by what source/authority (inside the district OR by an authority outside of the district.) Although it says "Boards of education must have plans as to how they serve gifted students." It also says many times what MAY be included, not that ANYTHING MUST BE INCLUDED. It seems that it leaves the service up to the district with no outside source of enforcement or mandatory service to these gifted students which should be given the same opportunities of year to year advancement of their abilities. It is unclear concerning subject level or even whole grade acceleration. It seems to only indirectly reference 'credit flex' and does NOT address what "college credit plus program" (i.e. post secondary) courses are authorized based on the students ability and acceleration based on ability. For example, some high schools refuse to allow a student to take college courses beyond the level of AP classes given in high school. They are often refused the ability to take 200/300/400 or higher level courses in college (although clearly capable of this level of education and challenge.) It does not address who should be responsible for the "Written Education Plan" or reference where to find this information. It should be a team of people, including the option of a parent to be a part of prep for the WEP. Instead it says, it should "Be developed in collaboration with a gifted intervention specialist or an educator who has met the district-determined criteria" Since the program and WEP is to consider the mental ability and stability and social issues, why isn't the District psychologist a member of the team to write the WEP, since the parents have to support the plan, they should also be given the option to offer their unique input into the preparation of the plan. The student only with the school up to 6 hours a day, 5 days a week, with the parents 24/7.</p>	10/23/2015 11:32 PM
513	<p>The rule allows districts to set their own rules for service and qualifications, eliminating any parameters set by the state. There would be no consistency between districts and ultimately this population of students would suffer with unqualified staff and lack of adequate instruction.</p>	10/23/2015 9:26 PM
514	<p>Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	10/23/2015 5:31 PM

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515	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/23/2015 5:12 PM
516	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/23/2015 5:04 PM
517	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/23/2015 4:55 PM
518	I would be concerned with b) as to the consistency of "district-determined criteria". I think a GIS should deliver the instruction.	10/23/2015 3:39 PM
519	Where is the comparison of the proposed rule to the previous rule? Not enough information to answer in an educated manner.	10/23/2015 3:00 PM
520	Since the proposed rule destroys all standard or quality service to Ohio's gifted children, this question can't be answered. There are no quality parameters for service. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom.	10/23/2015 2:56 PM
521	I think there has to be a more structured plan for gifted education. Often regular educators with some professional development do not really know what to do with the gifted students. The regular education class has Common Core, so gifted education has to have some kind of a well described curriculum. Also I believe there needs to be a participation of the Parents in writing the Gifted Education Plan, no less than the 504 and IEPs. There is no one more knowledgeable of the student than the parents. They know what their child already learned at home by himself/herself. The school has to be open to test out students in topics of the general education setting. At times parents are able to buy special advance programs and just hope their kids could do those programs or assignments during the time they are in school.	10/23/2015 2:37 PM
522	The proposed rule eliminates all guidelines for caseload, minimum levels of service, and how service is defined. We should not be limiting options, we should be expanding them. Teachers of gifted should be licensed to teach this special population, just as special ed teachers are required to have a special ed licensure.	10/23/2015 2:17 PM
523	A district may determine that any staff member is qualified to serve a gifted student, and may determine service to be anywhere from 15 minutes a week on up. There needs to be specifics as to what constitutes a qualified staff member, how many students that staff member can serve and the amount of time that is sufficient to be considered a gifted service. Again, there needs to be more specifics in these areas. In order for the gifted performance indicator to have any worthwhile merit, there does need to be equality in the staff offering services and what and for how long these services are being offered.	10/23/2015 2:15 PM
524	see previous note	10/23/2015 2:15 PM
525	There are too many options for who can serve gifted students. Also it should be required that programs and teachers of gifted are trained appropriately. It should be held at the same standard as special Ed.	10/23/2015 2:11 PM
526	Way too broad. How can you expect to regulate the outcome of gifted education with essentially no regulations on the inputs to the system?	10/23/2015 1:47 PM
527	1(a) is obscurely worded: "for the duration of the course" is not clearly defined and could be subject to multiple interpretations.	10/23/2015 1:23 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

528	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/23/2015 11:09 AM
529	As a parent in a small middle class city and as a professional working with urban districts I am seriously disheartened by the quality of services provided to gifted students across multiple districts. The teachers attitude toward gifted students comes across as "loathing" and with our focus as a state on driving down the standards, the teachers do NOT focus on gifted children at all. Therefore, I believe that the State Department is providing too much flexibility to districts in how they can check the box on serving students. Districts are meeting the requirement by providing half day once a week pull out program with no continuity with the regular classroom whatsoever. When I approached my 2nd grader's school Principal and classroom teacher to discuss the fact that my child is bored and not challenged in the classroom at all (and continues to tell me that he has not learnt anything at school), the teacher's response (in front of the principal was) "I have 20 other children and I can't provide your child extra support because he is too far ahead. If you want I can give him hard homework for you to help him at home." When I asked what the child is supposed to do for the 27 hours he spends in the regular classroom (he is shipped to another school for 3 hours each week for "gifted services"). The teachers response was "That's what being gifted is about, he is smart and can figure this out." Since the Department allows flexibility to the districts in just meeting the requirements versus really serving children, that's what they are doing. Every time I have approached the school with an issue they do not even involve the gifted department unless I ask for it. Yesterday at the parent conference the teacher shared with me that my child's DIBELS score is a 396 (end of first grade was 406). When I asked where this should be at the end of the year she said "He is too far ahead so you may not see a big gain." When pushed for what 1 year growth would look like she changed the subject. I share these specific instances to share that this is the push back I am getting as an educated parent in a middle class community. The situation is much worse for gifted students in urban districts. As a parent I continuously feel that my gifted children is a burden for the school. Gifted education in our great state is a sham based on my experience.	10/23/2015 10:42 AM
530	Too loose! To qualify a general education teacher to undertake instruction of gifted students, some parameters of training must be established. Any district can do anything they want and the students will be the ones who pay the price. When licensure in gifted education is so strict, why would ODE present service requirements in such a lax and open ended fashion. I am retired as of this year so there is no economic benefit or punishment on me to eliminate gifted trained teachers and coordinators, but I feel sorry for the students in any district who self determines who should teach the students, trained or untrained people.	10/23/2015 10:36 AM
531	Please allow for educator evaluation of truly gifted thinkers, problem solvers and artists. This narrow definition of gifted students allows accelerated students to be labeled as gifted.	10/23/2015 10:33 AM
532	The current services provided to my gifted children is substandard. For the majority of their school day they sit in classes that are taught entirely too slow for them. They have no challenges in their everyday life so then when they are challenged they are intimidated. I have 1 child in a private school specializing in gifted children and 1 child in public. Although their IQs are very close in range my K student who attends the gifted school is already learning more than my 3rd grader who is in public. Next year we will be moving our other child to the private school as well. This will create a financial hardship for our family but we will deal with it. How is it I pay taxes in a great school district but they still cannot meet my child's needs. In my experience, I have a total of 6 kids, 2 gifted, 2 special needs, and 2 who are average students, the public schools do a good job educating average and below average students. However they are failing the brightest and that is just sad. These kids have needs too!	10/23/2015 9:49 AM
533	I do not see any standards for quality and/or extent. Are you really going to leave it up to districts to determine who is qualified to provide gifted services? Would you do that with students with disabilities? No. There are specific regulations in place that set minimum qualifications for teachers who provide these services. Gifted children have special needs and need quality services provided by experts. I do not want my gifted child receiving "service" from a teacher who was forced to attend a one-hour workshop and suddenly labeled "qualified". Teachers of gifted students need extensive training and on-going training to effectively meet the needs of these kids.	10/23/2015 8:52 AM
534	The proposed rule obliterates all standards of quality service so it is impossible to answer this question.	10/23/2015 8:10 AM
535	Students identified as gifted have special learning needs and should be taught by a gifted intervention specialist when at all possible. The idea of having highly qualified teachers should not be devalued when it comes to servicing our gifted population. The proposed rules should include standards for how much time students are receiving services per week and maximum case loads for gifted intervention specialists. Allowing differentiation in the general classroom to qualify as service will not meet the needs of our gifted population.	10/23/2015 5:34 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

536	The wording is confusing in this section. It should be clearer to state that gifted services are not mandated by the state. However, if your district does provide services, what constitutes a service? Is there no minimum time requirement for students to receive services? I believe there should be if you are going to call it a gifted service. Also, I think it should be taken into account that many elementary schools go to grade six. The minutes should be the same for any K-6 service. It seems like the documentation is heavily weighted here versus any service the student is actually receiving.	10/23/2015 4:14 AM
537	Well, what is referred to as flexibility is actually just letting districts claim anything as a gifted service. This could mean that gifted students could have as little as 15 - 30 minutes a quarter in whatever the district claims as a gifted service. It would be hard to claim that minimal amount of time as a quality service. There needs to be some standards as to what constitutes a gifted service, especially considering that the Gifted Performance Indicator rates districts on the services they provide. If there is no consistency on what makes a gifted service than the Gifted Performance Indicator and the gifted inputs are meaningless because districts could claim anything as a service just to increase their gifted inputs. Also there needs to be a statewide definition of who can deliver a gifted service. Letting districts determine what criteria it will use to qualify someone is a gifted service provider allows for broad inconsistency across the state and makes the data gathered statewide meaningless since you are not comparing apples to apples. It is reasonable to require that teachers have some training concerning the students that they are teaching. Would you hire someone with no training in special education to work with students who have an IQ of 70 or below? Well, if you are asking someone with no training in gifted education to be responsible for teaching gifted students then you are asking that person to teach students who are as far away from an "average" IQ as the student with a 70. These 'outliers' on both ends of the spectrum have special needs which include adjusting the pacing, complexity, and quantity of information, among other factors. Gifted teachers are trained to do that and to address issues such as perfectionism, heightened sensitivity and other intensities that a general ed teacher has probably not had training in. These standards need to require that teachers delivering a gifted service are highly qualified to do that.	10/23/2015 12:15 AM
538	Remove that teachers the district approves and only use GIS. Consider current practices with special education, IS as equal to GIS.	10/22/2015 9:22 PM
539	There is nothing here that mandates that gifted children have individual plans or that they receive any services at all. The "standards" are so flexible that they do not demand any accommodation at all. There aren't any rules about time of instruction, what can be counted as differentiated curriculum, or any other standard that can be measured against. As the parent of two cognitively gifted children, I did not need the school district to identify them as gifted when it didn't mean comprehensive services.	10/22/2015 9:17 PM
540	In what curricular areas will services be required and funded by the state?	10/22/2015 7:39 PM
541	1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/22/2015 7:05 PM
542	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom.	10/22/2015 5:55 PM
543	Eliminate district-determined criteria; otherwise you're going to have janitors providing gifted services in some districts!	10/22/2015 5:47 PM
544	This policy appears that it will require more staff members to implement. Will funding be aligned with the cost of implementation.	10/22/2015 5:38 PM
545	1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/22/2015 4:49 PM
546	The rule provides too much flexibility. "Easy out" for districts to now provide much in the way at all for gifted services. WEP's are often "one size fits all" instead of truly individualized. Gifted education should be held to the same standards as special education for those with disabilities or delays	10/22/2015 4:32 PM
547	This survey is meaningless without a comparison to the previous rule or any context provided.	10/22/2015 4:12 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

548	I'm not sure I'm reading this correctly but it sound like it is saying districts need to provide services for gifted students, not just identify them. I believe this should be the case.	10/22/2015 4:08 PM
549	There are too many requirements. Teachers will be caught up with paperwork vs actually working with gifted students and designing meaningful lessons. Keeping service requirements / WEP very basic is important. Attention is being brought to our gifted students due to identification and our current services and WEPs; not sure why extra aspects need added.	10/22/2015 3:58 PM
550	It should state the frequency of how often these plans need re-evaluated just like a 504 or IEP.	10/22/2015 3:16 PM
551	<p>The proposed rule obliterates all standards of quality service so it is impossible to answer this question - regarding flexibility in how districts may serve gifted students. The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services.</p> <ol style="list-style-type: none"> 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards. 	10/22/2015 3:10 PM
552	<p>Concerns: The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services.</p> <ol style="list-style-type: none"> 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards. 	10/22/2015 2:49 PM
553	<ol style="list-style-type: none"> 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards. 	10/22/2015 2:42 PM

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554	<p>he proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services.</p>	10/22/2015 2:25 PM
555	<p>The proposal does not provide any quality parameters for any gifted services. Districts will be free to designate anything or nothing as service. The continuum of services needs to be fully defined, and class size limits and minutes of instruction need to be defined at least at the current level. Districts will have flexibility in developing services selected from this continuum. Gifted instruction needs to be provided by professionals who meet the requirements for the gifted license endorsement, or, if provided by a general education teacher, supervised by a credentialed gifted coordinator. Staff qualifications are not left to "district determined criteria" for any other population of students in Ohio, and gifted students deserve to be taught by those trained to meet their needs.</p>	10/22/2015 2:21 PM
556	<p>Concerns: The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. Recommend the following: Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	10/22/2015 2:18 PM
557	<p>As a licensed gifted intervention specialist, I am appalled at the proposed rule. First, the recurring use of the word "may" gives the distinct impression that this is not mandated service, but something that districts can pick and choose at the whim of the boards/administrators. Second, how DARE you imply that a classroom teacher with "sufficient knowledge" is in any way qualified to serve these students on a par with my own masters degree in gifted education? This would be laughable if it wasn't so frightening. It is obviously designed to help districts save \$\$ by reducing qualified staff and adding another layer of responsibility to already overworked general education teachers. In a normal classroom with an overloaded teacher, the most adept students frequently end up doing extra busy work to stay occupied or, sadly, being made to tutor less able students. In no way does this address their needs. Lastly, as a parent of gifted children I am appalled at the complete elimination of any measurable standards for the way my children will be educated. There are only a three potential service options instead of the 22 EMIS codes in the current standards. There are no requirements for timing or duration of service. There are no requirements for service settings. The districts are allowed to decide (unbelievable!) what constitutes "sufficient" knowledge for staff servicing my children. In other words, my child could be receiving 15 minutes a week of additional worksheets from his classroom teacher and that would be fine under the current rule. Would a parent whose child has an IEP be satisfied with this? It would be illegal!</p>	10/22/2015 1:59 PM

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558	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/22/2015 1:52 PM
559	Reinstate minimum # of minutes for serving students from current operating standards along with caseload limits. Get rid of the part that allows untrained teachers to provide service. Reinstate gifted coordinator and intervention specialist qualifications from current standards and make sure that all gifted instructors are given professional development.	10/22/2015 1:38 PM
560	The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. Changes: -Reinstate minimum service minutes for students from current operating standards along with caseload limits. -Reinstate and more carefully define service and instructional settings as provided in the current standards. -Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. -Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. -Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. -Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/22/2015 1:24 PM
561	I would recommend the following: ~Reinstate minimum service minutes for students from current operating standards along with caseload limits. ~Reinstate and more carefully define service and instructional settings as provided in the current standards. ~Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. ~Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. ~Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. ~Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/22/2015 1:13 PM
562	1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/22/2015 1:08 PM
563	The rule which states "Curriculum may be adapted to address a range of advanced ability levels consistent with the student's area of identification through the use of differentiation including enhancement, extension and acceleration" is far too vague. It causes the gifted student to be at risk of being placed in a classroom with students that may function well below grade level. The gifted student will not then receive the advanced curriculum they deserve because the regular classroom teacher will be overwhelmed with trying to provide for the struggling students. The gifted students become the ones left behind. Gifted students deserve to be educated in the least restrictive environment every bit as much as the low functioning students do. It should be required that gifted students be taught with other high functioning and/or above average students so that there is not so big a gap in ability levels within a classroom. This can be accomplished through cluster and/or ability grouping, creating a more homogenous classroom. Teachers may be good at differentiation, but they aren't miracle workers. Asking them to teach to a group of students with IQ's ranging from 75 to 150 and reading levels from 2nd grade through college level is an unrealistic and unattainable expectation.	10/22/2015 1:01 PM

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564	It seems very vague and allows loop holes. Gifted education should be one of the very top priorities in the state of Ohio as well as the entire country. Gifted Intervention Specialists should be in every district in America. Our future as a country depends on keeping our brightest students at the top of their knowledge ability. Gifted Intervention Specialists should work with the classroom teacher...in the classroom and pull-out sessions.	10/22/2015 1:00 PM
565	The WEP is an unnecessary step and pigeon holds a district to provide specific services. The WEP requirement needs to be removed.	10/22/2015 12:46 PM
566	Guidance counselors who work with gifted students should complete master's level course work in the area of gifted children and their needs.	10/22/2015 12:45 PM
567	Remove suggestions regarding homework and testing	10/22/2015 12:42 PM
568	I only feel comfortable with my gifted students being serviced by a gifted intervention specialist, no one else. I feel parents should be involved in the writing process of the WEP	10/22/2015 12:20 PM
569	School districts will try to get by with the least amount of professional dev. as to save money and teacher out the classroom. This needs to have certain criteria. This needs to be set by the operating standards and needs to continue as it is now or allow for more time with the intervention specialist.	10/22/2015 12:19 PM
570	Teachers need training in order to truly understand the needs of gifted children. A random classroom teacher that someone in the district thinks is 'nice' is not a good choice for gifted children. Districts need you to require training as a requirement prior to service.	10/22/2015 12:18 PM
571	The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. Suggestions: *Reinstate minimum service minutes for students from current operating standards along with caseload limits. *Reinstate and more carefully define service and instructional settings as provided in the current standards. *Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. * Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. *Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. *Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/22/2015 12:08 PM
572	b) An educator who has met district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students, as well as assist in the gifted identification process. This statement does need clarification or technical assistance. Districts will need to know what sufficient knowledge means in gifted. My concern is that gifted services will not be equitable from one district to another.	10/22/2015 12:07 PM
573	None	10/22/2015 12:06 PM
574	I think the quality and extent could be more specific and include services delivered in the 'regular' classroom '(via differentiation or enrichment- included on the plan) additionally I think specialized programming should be required. I didn't notice that. My fear is that schools with good funding will offer exceptional programming, or already do, meanwhile students at low-performing/schools of poverty will be offered subpar programming opportunities.	10/22/2015 12:05 PM
575	There needs to be an objective standard for services, like the 225 minutes per week we currently have for elementary students. Also, 'district-determined' criteria completely undermines any attempt at reliable, consistent services statewide. Finally, reasonable caseloads should be established as part of the standards.	10/22/2015 11:53 AM

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576	This is completely inadequate as written, and specific parameters for qualified services need to be established. Reestablish caseload limits and minimum instructional time to at least the levels established in the current Rule. Define the continuum of qualified services and settings; provide for qualified, licensed, experienced gifted teachers and coordinators, as is done for any other student population Ohio. In settings where a general education teachers is the service provider, supervision should be by a credentialed gifted coordinator. Require that the Written Education Plan includes the specific instructional plan prescribed and the goals established for the student, as developed/approved by a licensed gifted specialist. Require signatures of all service providers and parents.	10/22/2015 11:50 AM
577	The requirements for the personnel who can serve the students is vague. Also, it does not set a state-wide minimum standard. Districts are able to decide their own standards for gifted personnel. This will water down the talent pool for gifted teachers, and students will no longer be guaranteed services by a gifted-certified staff member. Gifted education is highly specialized, and teachers should have to earn certification in gifted education to be permitted to be teachers of the gifted.	10/22/2015 11:44 AM
578	The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and definition of service. 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/22/2015 11:41 AM
579	The proposed rule places a limitation on the use of subjective data. This poses an issue when tests are deemed invalid or biased to particular populations of students. An effective identification and servicing model, allows for objective and subjective data to be jointly considered as evidence of a student's areas of giftedness.	10/22/2015 10:57 AM
580	The phrase "district-determined criteria" creates so much flexibility that it essentially voids the premise that students that are identified do have specific needs/challenges, etc... I predict that 100 percent of gifted students will be served because districts will say any "good" teacher understands how to meet the needs of a gifted student. Unfortunately, I frequently hear colleagues comment that they wish we had as much PD on high learners as we do on struggling learners. The rule that currently requires teachers that are serving students to at least have a GIS meet with them and give them structured PD on meeting the needs of gifted students is reasonable and necessary. Perhaps the role of a GIS should be more flexible, but as this rule is written it would no longer need to exist at all.	10/22/2015 10:51 AM
581	Include curricular and instruction practices which support the student's social and emotional needs; I believe this should be an expectation for all students and not specified within the Gifted Operating Standards. A label should not dictate support for social and emotional needs.	10/22/2015 10:36 AM
582	The teachers serving gifted should be highly qualified, certified in gifted education. Your rule allows for the district to many variables .	10/22/2015 10:35 AM
583	Again, from a mathematics standpoint, "giftedness" is often viewed as fast and accurate computational ability, which is generally what can be measured on standardized tests. The Standards for Mathematical Practice (see Ohio's Learning Standards) offer much more guidance about what we would see in a truly "gifted" mathematics student. Often, math classes that are part of "gifted" services focus more on doing more of the curriculum quickly so that students "get through" more content -- rather than focusing on deep student understanding. Also, gifted services that pull students out of other classes "permanently" (for that year) perpetuate the concept of "haves" and "have nots" and also perpetuate the "separate but equal" notion -- see Jo Boaler's highly respected work in mathematics education (and statements from the National Council of Teachers of Mathematics) for a strong body of evidence for my statements in this response.	10/22/2015 10:18 AM
584	The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide variety of service options for gifted students. These draft standards would limit the options to 3 and destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general ed teacher with no gifted training. The proposed rule also eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district determined criteria." ODE does not allow this for any other student population. The proposed rule turns the gifted performance indicator into a useless measure, and disempowers parents and the general public to determine which districts are providing effective gifted services.	10/22/2015 9:53 AM
585	As a matter of individual fulfillment, economic development and American competitiveness, gifted services should be required. The research literature shows gifted students disproportionately go on to become innovators and entrepreneurs. Additionally, intrinsic gifted ability is independent of socioeconomic or ethnic factors.	10/22/2015 9:43 AM

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586	I specifically like the section below, but would like a little more clarification. We do not have much money in our budget and due to this, we have not actively pursued a GIS. When we had conducted preliminary advertisement and sought out a teacher internally who would be willing to pick up the certification, we found that there weren't many GIS out there, the one who did show interest was not a good candidate, and most of the teachers we approached weren't interested in picking up further certifications. I would like to know if the rule below means the district can set criteria, pick who we believe will be the best teachers for our gifted population, and assign students accordingly without having the GIS certification? If this is the case, I think it would go a very long way in helping us provide quality service for our gifted population. 2) Services shall be provided by one or more of the following: a) A gifted intervention specialist; b) An educator who has met district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students, as well as assist in the gifted identification process. c) An individual with specialized skills required to implement the student's gifted service where the service includes an internship, mentorship or higher education coursework, including credit flexibility.	10/22/2015 9:34 AM
587	This rule eliminates all quality areas for service including caseloads, minimum levels of service and the definition of service itself! These standards eliminates most EMIS codes causing only 3 options and destroy the ability to determine which services are effective. Services could be as little as 15 minutes a week taught by a gen ed teacher with no gifted training! ODE would never allow this for other populations of students! I suggest: Reinstate the minimum service minutes for students along with caseload limits. Reinstate define service and instructional settings as provided in eh current standards. Remove the provision that allows poorly trained or untrained gen ed teachers to provide service unless in an accelerated setting. Reinstate gifted coordinators and intervention specialist qualifications from current standards for both districts and ESCs and ensure all gifted instructors are provided high quality PD. Increase the scope and depth of the Written Education Plan and a reasonable attempt to require parent signature. also, require a gifted coordinator and gifted intervention specialist collaborate in the writing of WEPs. Reinstate instruction time requirement fro GIS.	10/22/2015 9:32 AM
588	None	10/22/2015 9:29 AM
589	I would have no problem with the service rules if money flowed to the districts to assist in providing services.	10/22/2015 9:03 AM
590	We'd need to hire people and/or help to license G&T teachers, as well, something the districts may not be able to afford. Would ODE then be increasing funding so districts can accomodate those rules?	10/22/2015 9:03 AM
591	Reinstate minimum service minutes for students from current operating standards along with caseload limits. More carefully define service and instructional settings as provided in current standards remove provision that allows poorly or untrained gen ed teachers to provide service unless it's in an accelerated classroom reinstate gifted coordinator/intervention specialist qualifications insure all gifted instructors have highly qualified pd reinstate instruction time requirement for GIS from current standards	10/22/2015 8:24 AM
592	Why does a GIS pay extra for certification if the district can just pick anyone they feel is qualified and call it service? Does this certification not really mean anything? The district is given too much flexibility and where saving dollars is an option, they have to take that route because funding is so tight.	10/22/2015 7:53 AM
593	Yes, #2 Gifted Intervention falls under the same umbrella as Special Education. So, it should ONLY be the GIS that is giving the service. Just the same as it is for Special Education, that area has to have a specialized instructor to give the intervention. The classroom teacher should not be the one giving the gifted intervention. I have seen to many times where that is written in the WEP, and the gifted student is not receiving any intervention because the teacher has such a wide spread of student abilities. The gifted students get shoved into the mainstream and do not get challenged. This is happening more than what you think and schools are getting away with if because no one is monitoring or checking on the districts.	10/22/2015 7:22 AM
594	1. Specify criteria to define "quality", both for instruction of gifted students and program administration; this relates both to HOW students may be served and the extent 2. Keep minutes tied to services OUT of the standards; quantity is NOT quality	10/22/2015 6:27 AM
595	I would like to see some sort of explanation as to what Catholic schools need to do to serve their gifted students. What options do the students have when their school does not have a gifted program?	10/21/2015 10:37 PM
596	In some situations, a gifted coordinator might need to work with students. Gifted education is all about differentiation to meet the needs of the students. As instructors, we need to differentiate between buildings to capitalize on the strengths of the gifted students in that particular building. In one building there might be 10 identified students and in another building 100. It does not make sense that students in both buildings have the exact same opportunities. Why deprive the 100 of a range of opportunities?	10/21/2015 10:21 PM
597	I am concerned about the certification requirements. Though I know teachers who are superb at differentiation, they do not have a strong basis of understanding the gifted child. At a minimum, there should be expectation in particular hours of coursework even if it doesn't lead to certification.	10/21/2015 9:45 PM
598	do not like push in program, prefer pull out	10/21/2015 9:36 PM
599	I do not have any changes at this time.	10/21/2015 9:23 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

600	I don't see specific descriptions for elementary services. "An educator who has met district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students, as well as assist in the gifted identification process." I think there needs to be a bit more direction in determining what constitutes "sufficient knowledge." Districts who do not truly understand the needs of gifted students may believe their teachers have met the criteria if they have some experience working with high performing students.	10/21/2015 9:01 PM
601	Flexibility for the district is fine but not for the student. A classroom for the gifted student in his/her identified gifted subject area promotes the freedom of the gifted specialist to take those students on an educational adventure. Being in the regular classroom with their peers for their non-gifted classes provides them with the opportunity to understand and get along with all types of individuals. Allowing the district to have flexibility, does not provide the identified gifted student the best atmosphere to develop into a well rounded person.	10/21/2015 8:49 PM
602	We make sure that our students who are on Individual Education Plans receive specialized services from qualified/certified intervention specialists then the same should be true for students on WEPs . These students should also receive their services from gifted specialists.	10/21/2015 8:23 PM
603	This flexibility in how districts serve gifted students is of grave concern to me. The current structure requires that students identified as gifted receive specific kinds of service and for minimum amounts of minutes. District flexibility means that in districts with cash-flow problems, the gifted services are vulnerable to cuts and minimized, ineffective service models. The gifted students in these districts are most frequently those that are likely to me under-identified and has poor educational outcomes due to socioeconomic factors and lack of opportunities.I fear for the educational disservice that is likely to happen to these students in these low income communities if guidelines for gifted services are not more clearly spelled out by these standards.	10/21/2015 7:43 PM
604	There needs to be more time for gifted education and gifted programs need to be taught by teachers with gifted training.	10/21/2015 7:26 PM
605	Again no mention of artistic students or students with exceptional abilities in the arts. Where will our modern day Picassos and Van Goghs come from? Did anyone proposing these plans ever stop and think or consider how all the items in our everyday lives were creatively and thoughtfully designed by someone? Apparently not.	10/21/2015 7:16 PM
606	The proposed rule does not provide specific limitations or parameters for gifted services. In my opinion, this will not lead to quality services for gifted students. The rule does not provide for educators specifically trained in gifted education to provide for identified students, lessening the "quality" of services due to lack of understanding by many general education teachers. The proposed rule should include standards of service by a gifted intervention specialist to meet the needs of the students to be serviced. This does not happen in other areas of specialization such as special education where students must be educated with a licensed special education practitioner.	10/21/2015 7:16 PM
607	The people listed in charge of the gifted services should be a part of writing the gifted plans and not just told what to do for students. There have been instances where a lack of resources has prevented the services to occur the way services have been written.	10/21/2015 7:15 PM
608	Teachers need training for providing services to gifted students.	10/21/2015 6:47 PM
609	You have to be kidding. We are already overwhelmed with the IEP process. Now you want plans for any kid id'ed as "gifted". Provide the time and resources or stop this.	10/21/2015 6:23 PM
610	The idea that districts can provide service using any personnel they deem qualified rather than actually certified gifted intervention specialists is ridiculous. No other students can be taught by personnel that districts establish their own qualifications for. Would we allow districts to decide who was "qualified" to teach a Calculus class or a special education class without requiring the appropriate state teaching licensure?	10/21/2015 6:23 PM
611	The proposed rule eliminates quality parameters. Please consider including case load and service minute requirements.	10/21/2015 6:12 PM
612	Mandated services	10/21/2015 6:09 PM
613	Reinstate minimum service minutes for students from current operating standards along with caseload limits. Reinstate and more carefully define service and instructional settings as provided in the current standards. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/21/2015 5:40 PM
614	Use the same time line as IEPs or 504 with a review period at one year with possible re-test every year.	10/21/2015 5:35 PM
615	Make sure all gifted students once identified are given services and not simply excluded because the student wasn't in a clustered classroom	10/21/2015 5:22 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

616	The proposed changes have completely eliminated the definitions of various gifted services. We currently have 22 ways to service gifted students, while the new standards just offer a vague definition through "enhancement, extension, and acceleration." Please reinstate the services definitions and clearly define the services and instructional settings. With the various service options intact, districts/staff will be better able to track which services are providing the most advancement/benefits for the gifted student. Additionally, the inclusion of allowing staff that meet "district determined criteria" to service the gifted students is very troubling. As with the third grade guarantee, teachers of at-risk elementary students need additional coursework to provide adequate intervention for these students. As with special education students, teachers of students with special needs require additional coursework to provide adequate interventions for these students. Why would our gifted students require any less? Please reinstate the qualifications for gifted coordinators and intervention specialists from the current standards for districts and ESCs to ensure that our gifted students receive the high-quality gifted instruction they require.	10/21/2015 5:17 PM
617	Do NOT use terms such as "district-determined criteria" for staff that will be teaching gifted students. Reinstate current standards for caseload, service minutes, and instructional time of GIS. Reinstate educational requirements for GIS and Coordinator. Carefully define gifted service options/delivery and what constitutes differentiation.	10/21/2015 5:17 PM
618	Additionally, students should have a survey that expresses their preferences and allows them to explore, in depth, their areas of interests. Each pupil should have an opportunity to present a final project of exploration. Their work should be in conjunction with studies done in the media center and outside of school contacts. This survey should also include parental and teacher agreement so that student teacher and parent are consistently aware of what the G/T student is doing.	10/21/2015 4:52 PM
619	Having regular classroom teachers provide services for gifted students and write WEPs for gifted students will not ensure that gifted students are receiving the high quality services they deserve.	10/21/2015 4:45 PM
620	Districts have ignored gifted students for years. Many times, these students are expected to just "get it" and "behave" while struggling learners dominate the teacher's time in the classroom. Many districts also don't offer gifted classes for all grade levels.	10/21/2015 4:39 PM
621	I think WEP's should be handled like IEP's and parents should have input as well.	10/21/2015 4:31 PM
622	School districts must think seriously about clustering these kids with one teacher that wants to teach them. By spreading them out over numerous teachers, it is not fair to the student or the teacher to have to adjust and find resources that fit one child. Teachers must be given training to help these kids. Our gifted coordinator writes canned WEP's for almost every child without ever meeting the child or talking to their teacher! And we are WEP responsible but have no input into the process.	10/21/2015 4:29 PM
623	The parent and student should be part of the process in developing the WEP, just as parents and students are part of the process in developing an IEP.	10/21/2015 4:23 PM
624	1. The language is unclear as to whether the district MUST services for all who have been identified. 2. The language is couched in achievement type language, which may not fit other types of giftedness.	10/21/2015 4:11 PM
625	At the elementary level - Mandate a minimum of 5 hours weekly services with a gifted education specialist or a teacher being trained to become one. Require differentiated math throughout the grade levels as appropriate, with other gifted students. Putting gifted math students into a higher level class still taught for the rate of learning of an average student is not adequate.	10/21/2015 3:51 PM
626	1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/21/2015 3:42 PM
627	Parents should be included in the writing of the WEP as they are included in the writing of the IEP.	10/21/2015 3:28 PM
628	This is a difficult area to address.	10/21/2015 3:16 PM
629	I am not sure that this person is qualified: An educator who has met district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students, as well as assist in the gifted identification process.	10/21/2015 3:06 PM
630	I did not see any timeframe re: WEPS. When will they first be provided? How often will they be updated?	10/21/2015 3:03 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

631	<p>I will NOT agree or disagree with the first question about flexibility in how districts serve gifted students because the proposed rule OBLITERATES all standards of quality service so it is impossible to answer this question. My concerns with the new standards are that the proposed rule eliminates ALL quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. This is ridiculous! The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. Therefore, I recommend the following: 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	10/21/2015 2:52 PM
632	<p>The proposed rules provide flexibility but lacks definition on what qualifies an individual to serve gifted students.</p>	10/21/2015 2:15 PM
633	<p>The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	10/21/2015 2:13 PM
634	<p>If the leaders within districts determine what type of preparation is required to serve gifted students they could determine an Educational aide would be sufficient. These students are cognitively 30 points above average, and districts trying to save money could make decisions such as this which will clearly NOT meet the needs of these special children. There needs to be a higher level of specialized education for proper services to be effective. It is inappropriate for district leaders to make these decisions because most of them have no training or true understanding of the unique needs of gifted learners themselves. The quantity of instructional time dedicated to higher level rigorous gifted curriculum should be crystal clear, as in minutes or class periods per week. A district may determine that gifted services equals half an hour a month, which is clearly not enough!</p>	10/21/2015 2:09 PM
635	<p>Seems to basically set no standard with all offerings left at the discretion of the locality. If so what is the point of the guidelines? Gifted Educators should follow licensing guidelines as for any other special education need.</p>	10/21/2015 1:57 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

636	<p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	10/21/2015 1:53 PM
637	<p>The proposed rule does not set any type of parameters around services.---There is not a "clearly" described standard...let alone one for "quality and the extent" of the services. The current operating standards provide clear and concise standards. Grave concern over staff requirements to serve gifted students. The staff needs to be specifically trained in gifted education with either a gifted education specialist license or a masters in gifted education.</p>	10/21/2015 1:42 PM
638	<p>If gifted services are allowed to be provided by someone other than a gifted intervention specialist, districts will eliminate gifted intervention specialist positions to save funds. This will leave the responsibility of serving gifted students to the regular classroom teachers. Classrooms teachers already have too much on their plates. On top of that, most have received little to no training on what is needed to serve gifted students. This rule is very vague in that those providing gifted services need only meet "district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students." The phrase in quotes has no clear meaning at all. It will mean different things to different districts, and I am sure it will mean very little "knowledge" about gifted students for some people expected to provide gifted services. Also, the case load for gifted intervention specialists is taken away. This will allow districts to pile more students on gifted intervention specialists. Writing WEPs and working to grow gifted students are both very time-consuming. Gifted students will not get the service they deserved if work loads for those serving gifted students are too high.</p>	10/21/2015 1:39 PM
639	<p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	10/21/2015 1:16 PM
640	<p>There are no required minutes for service as the prior standards have indicated. This has allowed gifted students to get ample time with a trained GIS. Allowing districts to set these themselves means that some students will receive minimal enrichment. Also, by not requiring gifted endorsement, the quality of instruction would be impacted. As well meaning as some teachers are, without training in just what a gifted mind needs and/or works, the quality of service is again compromised. Services should only be provided by a GIS. Gifted is an area of "special education" and you wouldn't demean an intervention specialists training, so why do so with GIS?</p>	10/21/2015 1:14 PM
641	<p>1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.</p>	10/21/2015 1:09 PM
642	<p>Why is there no provision for (non-binding) parental involvement in the development of the WEP?</p>	10/21/2015 1:06 PM
643	<p>Gifted students are best served by professionals with gifted endorsement and an understanding of all the dynamics involved when teaching gifted students. There needs to be more specific criteria for what is considered a highly qualified teacher in this specialized area. Also, there should be some parameters regarding contact time and case load to ensure that students are served appropriately.</p>	10/21/2015 1:01 PM
644	<p>Services should be provided by a GIS....not someone the district deems 'appropriate.'</p>	10/21/2015 1:01 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

645	<p>1. The first option for this question is a trick response because the proposed rule obliterates all standards of quality service thereby making it impossible to answer this question. 2. Specifically, this proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. Currently, there are 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards being proposed would limit the options to THREE (3) and essentially destroy any ability to determine which services are effective and which are not. 3. Additionally, services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. 4. In addition, the proposed rule eliminates gifted staff qualifications that exist in the current rule and which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population - why would we ever want it for gifted students?. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. 5. Recent survey data indicates that for most general education teachers this supposed contribution to gifted kids amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. 6. No measure for comparison would exist. Specifically, the end result disempowers parents and the general public to determine which districts are providing effective gifted services. Again, based on being a parent of three students all identified and educated in Ohio's public schools WITH gifted intervention since 2000, I recommend: 1. The reinstatement of minimum service minutes for students from current operating standards along with caseload limits. 2. The reinstatement of and more carefully defined service and instructional settings as provided in the current standards. 3. Removal of the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstatement of gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. An increase in the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstatement of instruction time requirement for gifted intervention specialists from current standards.</p>	10/21/2015 12:56 PM
646	<p>Leaving quality to district discretion is a huge mistake. Districts need guidelines - Caseload limits service minutes Gifted Coordinators and Intervention Specialists HAVE to be licensed with a Gifted Endorsement or Master Degree in Gifted Ed. Anyone providing "service" needs to be highly qualified - if it is a regular ed teacher, they need Intensive, ONGOING HQPD This proposed rule will allow districts to send a bunch of teachers to a one-hour in-service and claim that they are all suddenly experts and qualified to provide gifted service - which is obviously not true. This proposed rule not only LOWERS standards for educating gifted students, it completely ELIMINATES them.</p>	10/21/2015 12:54 PM
647	<p>Taking out the required times takes the teeth out of this Rule. With no minimum time of service, more gifted children will be left unserved or underserved. Or, districts could call about anything "service".</p>	10/21/2015 12:32 PM
648	<p>I would recommend the removal of the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development.</p>	10/21/2015 12:32 PM
649	<p>An educator who has met district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students, as well as assist in the gifted identification process. WHAT DOES THIS MEAN? Gifted students deserve the knowledge and expertise of educators who have been trained to meet their needs. Gifted education is the flip side of special education, which gives parameters as to what we expect of our programming and professionals as they work with students with special needs. Our gifted students deserve to be trained by professionals who have their best interests in mind and who promote their growth. I want to see specifics. Reinstate and more carefully define gifted service and instructional settings as provided in the current standards, and reinstate personnel who is qualified in the areas of gifted education to provide these students quality service.</p>	10/21/2015 12:30 PM
650	<p>This law can be interpreted in many ways so that gifted students may not receive quality services. There can be many interpretations of "differentiation" and the extent to what is done for this.</p>	10/21/2015 12:22 PM
651	<p>The proposed gifted operating standards do not give an outline as to what quality gifted services are. It leaves that open to the interpretation of the districts. In a county where gifted services have been gutted over the past five years, I am now having discussions with administrators in two different districts as to why students are not taking higher level classes. That is because the districts dissolved gifted education courses which promoted rigorous thinking and creative application, not to mention supporting the social and emotional health of students in the elementary and middle school grades . Districts have decidedly brought down the bar of educational experiences that have been offered to gifted students. Many of our students have turned off because the districts have modeled to them that it is ok to be in classrooms that teach to the middle and don't foster or promote higher-level thinking.</p>	10/21/2015 11:57 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

652	Identification isn't enough, as it is schools are required to identify gifted kids but in my experience they aren't required to DO anything with them - or they only make a nominal concession, at least in the elementary school stage. There ought to be some incentive for elementary schools to differentiate gifted & talented kids early with the goal of achieving their full potential - not merely with the goal of keeping them stimulated just enough that they aren't totally bored. Our system does the absolute minimum they need to, in order to say they did something. We've had individual teachers take initiative but as a district, I can't say that I've seen that in our local school system.	10/21/2015 11:49 AM
653	1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/21/2015 11:47 AM
654	to make sure children identified as gifted get the services and education they need...that promises nothing to the student.	10/21/2015 11:38 AM
655	. 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits (without the sunset provisions) from the draft of the gifted operating standards approved by the State Board of Education Achievement Committee (11.11.13 draft). 2. Reinstate and improve service and instructional settings as provided in the current standards and adjusted to some extent in the 11.11.13 draft. 3. Remove the provision that untrained general education teachers provide service unless it is an accelerated classroom as outlined in the 11.11.13 draft. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC). 6. Reinstate instruction time requirement for teachers from current standards. 7. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 8. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 9. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 10. Revise whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that is required in ORC and which exists in the current operating standards. 11. With the reinstatement of service parameters as described above, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 12. Reinstate the district service plan as required by ORC. 13. Reinstate identification and service definitions as outlined in current operating standards 3301-51-15 and adjusted to some extent in the 11.11.13 draft.	10/21/2015 11:36 AM
656	I do like the idea of gifted students having Written Plans. I think these plans should start early, as I was told my son could not be identified until he reached 5th grade.	10/21/2015 11:29 AM
657	Minimum contact hours? Don't like that gifted interventionist doesn't need to be involved with gifted services. If the class isn't being taught by the GIS, then at least a highly qualified teacher with the support of the GIS. Our district will put the standard so low for our teachers in order to save money/ be more convenient for the adults that the quality of the intervention will be extremely poor and negate any potential benefit to the kids. Please don't allow the districts to set the standard for who teaches our gifted students.	10/21/2015 11:29 AM
658	These rules seem to make providing gifted services WAY too flexible for a district. Why are there not requirements for GIS certified teachers to teach the gifted students? Looks like you are leaving it up to the SD admins to determine if the teachers meet "district-determined criteria" for gifted teaching. Most districts would choose a low \$ definition for this criteria. Require SD to hire or be training full GIS certified staffs. WEPs are a mess in our SD.	10/21/2015 11:20 AM
659	The proposed rule allows too much flexibility in how districts serve gifted students. Gifted students deserve service that is provided by a certified gifted intervention specialist. While classroom teachers may differentiate at times to provide some stretch to the gifted student, it is not enough. Teachers become too busy with bringing other students up to meet standards that the gifted student is too often left to sit and wait for stretch to happen. If districts are allowed to set the standards as to what counts as gifted service and who provides the service, gifted service as it is meant to "serve" will dwindle to nothing. I say this with experience.	10/21/2015 11:12 AM
660	N/A	10/21/2015 10:49 AM
661	none	10/21/2015 10:42 AM
662	Not sold on 100% written education plans. Can this be optional?	10/21/2015 10:36 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

663	It sounds like the schools are required to identify gifted students, but are not required to provide any gifted services. How long is a student identified as gifted (must they be retested to receive services every year)? How can we ensure that they are - at least- receiving the same basic curriculum within the same school as every other child, gifted and non-gifted (as is a problem at my child's current school...non gifted children are studying tougher math subject matter than my son who is supposedly grouped into a gifted math cluster)?	10/21/2015 10:34 AM
664	No	10/21/2015 10:26 AM
665	If districts are given the latitude to create their own standards for educators to teach and coordinate gifted programs, there is a real and present danger that every district will have different standards, which will ultimately lead to no standards. This part of the rule undermines the expertise of educators who know how to best serve the needs of the gifted, and it disregards the time, effort, and money educators invested in earning gifted education validations and licenses. While it is understandable that district administrators benefit from more flexibility in hiring and staffing, this should not be achieved at the expense of educating gifted children. I strongly oppose this part of the rule.	10/21/2015 10:12 AM
666	1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	10/21/2015 10:11 AM
667	The district flexibility in the proposed operating standards will allow for extremely limited gifted education requirements for the staff who will deliver gifted services. While I realize that Ohio universities have pulled back on offering gifted programming, we still need to ensure that teachers understand the complexity of gifted student needs and gifted teaching strategies. Too many of these teachers do not fully understand or appreciate the social emotional needs of gifted students and do not really see the need to differentiate for them. These staff members continue to need training and it should be documented and monitored.	10/21/2015 9:48 AM
668	The current rules ask that teachers be trained. If schools are allowed to say what training is, there will not be consistency in the type of training or rigor in the training.	10/21/2015 8:56 AM
669	With all of the identification happening in the previous rule stating a general ed teacher can offer all services is not going to please parents. Once parents get the ID letter, they will want some type of Gifted services by a GIS.	10/21/2015 8:12 AM
670	Not sure how to word it, but I think there needs to be more scrutiny of high school level honors, enriched, and AP courses. Since so many Ohio districts are opening up these courses to typical children who may or may not be ready for the rigor, teachers are forced to "water down" the courses to meet the needs of typical students, often to the detriment of gifted students. There is only so much differentiation that can be done when there is a wide range of abilities in such a classroom.	10/21/2015 7:50 AM
671	I do not understand the criteria by which a district can select a person to teach gifted children when there are no official credentials required to accompany that selection. What are the guidelines districts have when making a selection of a "qualified" person?	10/21/2015 1:12 AM
672	No.	10/20/2015 11:12 PM
673	Again, no specifics given... Details the big picture for flexible services for student identified as gifted. However, when rules are vague, districts may learn how to shortcut student services yet be in compliance with guidelines but not provide effective services. Needs to be even more specific/prescribed.	10/20/2015 10:47 PM
674	I don't understand the idea of the district randomly being able to say that an instructor has met undefined criteria (i.e. saying that a district can set it's own criteria for an instructor to oversee gifted education when neither the district nor the instructor may have had special training in gifted services seems to allow watering down any type of standard). If the student has been identified as gifted, he/she should receive services from educators who have received specialized training, that is recognized be an outside certificate standard, to supply the services.	10/20/2015 10:05 PM
675	The number of students in the gifted education setting needs to be placed back into the rule. The quality of service will diminish as more students are added without support. Additionally, a GIS should be the service provider in these cases, otherwise, this is not a quality service.	10/20/2015 9:43 PM
676	School districts should be required to staff gifted intervention specialists.	10/20/2015 9:30 PM
677	While I appreciate the flexibility given to districts, especially small districts who may have few gifted students to serve, we want to be sure our gifted stud nuts receive the services to which they are entitled. Students with disabilities have federal law ensuring they receive services. What do gifted students have securing their services? With the new provisions in federal education reform act, we need to be sure our gifted students show growth each year.	10/20/2015 9:26 PM
678	Ditching service models = flexibility? No. And there is no quality outlined.	10/20/2015 9:26 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

679	Very flexible. Too flexible. This was fine in the original: (1) The district shall not indicate to parents or report to the department of education that a student is receiving gifted education services unless services are provided in conformance with this rule. But the new looser language would not be good in the hands of a district that fails to provide an ODE-standards-meeting gifted program. Without any call by the ODE to hold districts responsible to report and account for their programs, what does this mean? "district-determined criteria"	10/20/2015 9:06 PM
680	Gifted specialists should provide gifted services to all gifted identified students.	10/20/2015 8:49 PM
681	This rule does not mandate that there be any meaningful service at all. A district could claim that 2 identified children in a classroom constitutes a "cluster" and therefore they are "served" with absolutely no other accommodations. It needs to be clear that to be considered served, districts MUST employ a model that has proven effectiveness in educating those who are identified as gifted. Any "service" that falls outside of these guidelines should not count as actual service. Clustering alone has an effect size of 0. Clustering in a room with a teacher who has a great deal of support from a Gifted Intervention Specialist and a lot of training is slightly higher, but not by much, unless in conjunction with other models. Pull out programs, self-contained classrooms and acceleration all have measurable effect sizes. So do a few other models. These should be ones allowed by the operating standards, not ones that sound good but do nothing. Gifted services, to actually be considered "gifted services" should be implemented by a Gifted Intervention Specialist who has valid teaching certificate and gifted validation. Allowing an educator with "district-determined criteria" would allow any teacher, regardless of training, ability or even basic understanding of the needs of gifted children to be the one providing their "gifted service," which might be absolutely nothing at all besides having a cluster of gifted students in his/her classroom. With no specified number of minutes of service there is a massive loophole in what a district may call "service." Five minutes with a gifted coordinator in the building and everybody is served! There should be a set minimum of time that a child must be receiving actual gifted services in some form for them to qualify as "served." In truth, it should be much higher than the current 225, especially for children gifted in multiple areas or those who are cognitively gifted -- those children are gifted all the time, and need an education that is consistently commensurate with their abilities.	10/20/2015 8:44 PM
682	Forget WEP's. IEP's or a WEP become a legal document that is rarely followed with fidelity. There are no IEP's or WEP's in a career. Force schools to provide CCP and credit flex opportunities.	10/20/2015 8:44 PM
683	What is the district-determined criteria that specifies sufficient knowledge for educating gifted students? The district-determined criteria will vary greatly among the districts in Ohio. The new rule should clearly state the criteria for educators of gifted students and the new rule should include that the educator must hold a gifted intervention specialist license.	10/20/2015 8:26 PM
684	C.) 2. Services shall be provided by one or more of the following: b. An educator who has met district-determined criteria..... I believe this deter districts from hiring highly qualified staff with gifted endorsements to provide students with services.	10/20/2015 7:52 PM
685	District created criteria provides flexibility, which is good, but it also provides inconsistency.	10/20/2015 7:33 PM
686	Gifted students are not a protected class. the "equal access" language is misleading. "Gifted intervention specialist" is not appropriate, it seems as if you are melting "gifted " students with "disabled" students. This is wrong. Lose the "social and emotional needs" language. Seriously? Now you want to add that the Districts are required to tend to the social and emotional needs of students who are gifted? Really? This language will be exploited by lawyers whose only desire is to fill their pockets with taxpayer money. This language will result in their children going to Harvard, while the Ohio taxpayers foot the bill. Just keeping it real.	10/20/2015 7:32 PM
687	I believe that allowing individual districts to determine the eligibility of teachers rather than requiring licensure means that the standard is being lowered, as well as being unequal across different districts.	10/20/2015 7:10 PM
688	NONE	10/20/2015 5:53 PM
689	Services need to be provided by a gifted intervention specialist.	10/20/2015 5:18 PM
690	Rules seem very cumbersome and I would expect that they would require the addition of staff to support. This programs seems to be imposing similar, cumbersome requirement on gifted students to those required by Special Education students. I am not sure that districts can afford this. Money/Expense needs to be considered!	10/20/2015 4:32 PM
691	"An educator who has met district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students, as well as assist in the gifted identification process." This opens the door for any teacher to service gifted students. I strongly disagree that this is in the students' best interest. Prefer the standard that is currently in practice - the HQT with supervision from the GIS.	10/20/2015 4:24 PM
692	How a district meets the standard of a teacher of gifted students should be strongly regulated.	10/20/2015 4:16 PM
693	The proposed rule decreases the quality of the instruction that we would be providing to our gifted students by not requiring that students receive instruction from someone with a licensed gifted endorsement, or from a general education teacher receiving ongoing professional development from a coordinator or teacher with a gifted endorsement.	10/20/2015 4:13 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

694	Service to gifted identified students should only be through GIS or teachers with gifted credentials. Other staff does not have the training necessary to instruct these students without doing harm on both an academic level as well as social and emotional levels.	10/20/2015 4:04 PM
695	I do not think it is necessary to include formative and summative assessments in the WEP. Assessments will vary from class to class, and there will be no way for the Gifted Intervention Specialist to surmise what will be included on such assessments, given the wide variety of students each GIS may serve. For instance, if my small, rural district had a GIS (which we don't - all GIS responsibilities are given to the teachers), we would theoretically only have one GIS. One GIS could not write formative and summative assessments for every grade level and every class that each gifted student is in.	10/20/2015 4:04 PM
696	Keep in mind that if you are able to write criteria for determining the success of a program of identifying and cultivating gifted students, then the program has not been very successful. The true measure of success is that students exceed the capacity of bureaucrats to anticipate.	10/20/2015 3:57 PM
697	Does this allow a district to say to any teacher "bam, you are going to be our point person on deciding who is gifted and to teach them" even if they don't have credentials in gifted education? It seems like that from my reading. (It would be helpful to be able to go back a page and re-read to check, but when I did that, I had to start all over). In general, I think someone credentialed in gifted ed should be the person involved in identifying and teaching gifted students. I'm afraid these rules make the practice optional and therefore, cheaper, for schools. Of course the schools will choose that way.	10/20/2015 3:46 PM
698	"An educator who had met district-determined criteria . . ." I am concerned about what the criteria will be and how it will vary from district to district. Should the criteria be set by the state if services are not being required to be delivered by an intervention specialist?	10/20/2015 3:45 PM
699	What is the depth of the written educational plan? Would a student who is qualified and taking any number of AP or International Baccalaureate classes have a plan specific to that effect or can the plan be more general than that?	10/20/2015 3:28 PM
700	"Services shall be provided by an educator who has met district-determined criteria." I am concerned about what the district criteria will be and how it may vary from school to school. Should the criteria be set by the state if services are not required to be provided by a gifted intervention specialist?	10/20/2015 3:27 PM
701	Add further details about who may provide services to gifted students when not a gifted IS.	10/20/2015 3:03 PM
702	I'm not sure quality is full addressed in the proposed standard. it appears to describe the quantity of services.	10/20/2015 2:57 PM
703	Remember "gifted identified needs" are not just academic. The affective domain too needs to be supported.	10/20/2015 2:39 PM
704	Clarify 2 parts B and C	10/20/2015 2:37 PM
705	Allowing districts to determine that a 'regular' classroom teacher is sufficient to provide gifted services is tantamount to saying one needs no special understanding of gifted students to serve them well. University teacher-prep classes do not sufficiently prepare one for working with gifted students. I still encounter teachers and administrators who believe serving gifted means just giving bright children additional work. Anyone who is seriously considering serving gifted students should be required to at least take some additional classes and/or serve a mentorship with a qualified GIS. This haphazard approach would never, and should never, be considered with special education students; gifted students deserve no less consideration	10/20/2015 2:36 PM
706	2b will be something I see districts abusing or stretching the truth to fill with whomever they so choose.	10/20/2015 2:33 PM
707	A classroom teacher who gives gifted students a different list of spelling words is not serving the needs of a child identified as gifted in reading, and yet, with these standards this may be all the "service" a student receives. Giving a child more difficult math problems does not address math problem-solving strategies or the application of math in real world situations, and yet that is the service most math teachers will provide. Services must be more defined so that two gifted students sitting together in the same classroom doesn't constitute a "cluster group" where they are not challenged. While districts need the flexibility to determine how many minutes of service they can provide to gifted students, it must be high quality service with the student is truly benefitting and therefore provided by a teacher with gifted certification.	10/20/2015 2:19 PM
708	The current & proposed changes make the WEP still seem like a frivolous document to document compliance. The WEP should be a plan similar in nature to an IEP where the child, parent and district personnel create goals together.	10/20/2015 2:19 PM
709	Keep the 2008 standards in place. AGAIN...it is not necessary to create an environment that hinders our gifted children.	10/20/2015 2:12 PM
710	As far as the fine arts are concerned, the terminology and services referenced in this "Rule" are general enough to apply to this group of students. It would be a positive addition to add service suggestions such as: portfolios or performances.	10/20/2015 2:03 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

711	There is still a loophole for districts to look like they are serving, when in reality they are not. The standards must be much more specific, not just a way for a district to look like they are serving the gifted students.	10/20/2015 2:03 PM
712	It would appear everything can be considered service - districts will do this. This is already happening with the input points. Districts are counting classes as services that are not designed to meet the needs of gifted students.	10/20/2015 1:57 PM
713	ODE needs to provide funding to help districts meet the needs of providing gifted services to students.	10/20/2015 1:51 PM
714	Services must be provided by trained gifted intervention specialists and/or gifted coordinators.	10/20/2015 1:51 PM
715	Gifted services should only be administered by teachers and specialist that have been trained specifically in teaching gifted students. They do not learn and should not be taught the same as regular students. Teachers need to have specific training and certification in teaching gifted students.	10/20/2015 1:50 PM
716	While removing the specific language around gifted services may provide "flexibility" to districts, it also opens up an "anything goes" approach to providing services to gifted students. All descriptions of service settings, minimum time requirements, maximum caseloads, etc., that define the research-based best practices of gifted education have been removed in this proposed rule. Without standard service settings defined in the rule, it will prove difficult to determine the effectiveness of such settings on student achievement as each district may apply their own local "flavor" to a particular setting. Additionally, by removing minimum time requirements for services and maximum caseloads for GISs, we also run the risk of diluting services to such a degree that they no longer have a positive impact on gifted students. With services being included in the gifted performance indicator, districts will not be evaluated equally. One district, following best practices for serving gifted students and utilizing trained gifted staff, could receive a lower rating on the gifted performance indicator than a neighboring district who is providing services sporadically, delivered by a teacher lacking training in educating gifted students. This sets up the dangerous dynamic of districts looking for shortcuts to improve their rating.	10/20/2015 1:48 PM
717	C2 - b: An educator who has met DISTRICT-DETERMINED CRITERIA allows for any standard of quality and extent of services for gifted students. If a district determines that any teacher who can say they differentiate meets this standard, than that will be considered acceptable servicing of the gifted. This will of course make things very easy for the districts which is why I believe this is actually what will happen in many districts. But logically; if that is really all there is to it why then does a gifted intervention specialist acquire anywhere from 20ish to 30ish credit hours in the field in order to have either the endorsement or the Masters allowing them to be professionals in this particular area. Is all the professional development just superfluous then? Are the requirements for the individuals servicing struggling learners, special needs students left up to the districts as well? I believe that such criteria should be determined at a higher level than the district, by individuals who are familiar with the needs of gifted students; as it is written it leaves the issue open for students to be served in the most convenient possible rather than the best way possible. I know at my own school few administrators know much about gifted education in general and freely admit it, I know that many of my colleagues have rather vague ideas about it as well and that often in the classroom meeting the needs of gifted students translates into giving these students additional essentially busy work as they are early finishers which should clearly be seen as in inadequate if not inappropriate strategy for servicing the gifted. Teachers come to me with questions now, they express what they DON'T know about gifted all the time, I know people actually acting as gifted instructors who haven't received any professional development in the area now, and they struggle- allowing this to continue and even increase in occurrence as more unqualified teachers will be told to service these learners without real support is a mistake in my opinion.	10/20/2015 1:42 PM
718	Taking into account the emotional side of a child not just the academics.	10/20/2015 1:32 PM
719	It provides too much flexibility. Districts that provide separate schools for gifted children end up serving a smaller segment of the gifted population because there is inherently going to be a limitation in the number of slots available as well as a limited number of families able to accommodate a change in school building attendance due to transportation limitations. This type of magent school for gifted elementary children can result in antagonism among parents, etc.	10/20/2015 1:23 PM
720	It seems to be taking a step backward in serving the gifted students instead of helping them.	10/20/2015 1:23 PM
721	I do believe in flexibility, however, I also believe in high standards. Having "district determined criteria" with regards to who provides gifted services opens the door to substandard offerings from districts that elect not to employ licensed gifted intervention specialists.	10/20/2015 1:20 PM
722	Many school districts take advantage of this flexibility and gifted students end up by under served, or not served at all. Many districts do not have the staff necessary to serve gifted students and teachers end up in roles that they are not qualified for, all in the name of flexibility. Districts should be required to provide training in writing WEPs and to provide/pay for the necessary coursework to become gifted certified. Many districts have teachers teaching gifted students and those teachers have not been trained in how to write a WEP.	10/20/2015 1:18 PM
723	This does not say that schools must provide gifted services. Also, general education teachers need to be required to receive gifted training since gifted students are part of their population of students.	10/20/2015 12:41 PM
724	Why create or change a rule that is not needed. Until you require service the point is moot.	10/20/2015 12:33 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

725	Concern that we put these rules in place and require districts to write individualized plans, but is there also funding that goes with this?	10/20/2015 12:28 PM
726	More, more, more. That's what I see when I read this proposed rule. It will require MORE testing, MORE time away from instruction, and MORE expectation from the MORE students who will be identified as gifted. However, where is MORE money to support cost of additional testing? Where is the MORE money to be able to compensate teachers for an extended school day since we are loosing more time to testing? Where is MORE money to hire additional gifted teachers and provide additional gifted services? Where are MORE gifted teachers? Do policy makers not know there is a shortage of gifted teachers, especially in rural settings? Having to hire gifted teacher for this year, there were only two candidates; both from North Carolina. They, then backed out because of our location. We recruited one of our ELA teachers with an interest to work under a Supplemental License. Policy makers keep bowing to gifted advocates and fail to realize the majority of the schools in this state do not have the resources to support the change initiative.	10/20/2015 12:23 PM
727	districts can call pretty much anything a service without clarifying what type of HQPD is needed for regular ed and then districts are not coding with integrity in order to boost score on gifted indicator, no time requirements for service... so 30 minutes a week could be your child's gifted service that is reported to the state????!! NOT acceptable.	10/20/2015 12:20 PM
728	This is very vague and does not provide enough structure as to the time students are served or the ways students are served. Basic reading groups, independent projects, etc. can be included with no direct supervision or criteria for developing higher level thinking skills.	10/20/2015 12:12 PM
729	In Section 2 part b and c - the services need to be supervised under the guidance of the Gifted Intervention Specialist. I disagree 100% with the "individuals with district training" replacing an ODE licensed and college trained GIS. Same with Section 3 part a, i. The GIS SHOULD write the WEP, not someone who is merely "trained".	10/20/2015 12:00 PM
730	We think there should be minimum minutes of service.	10/20/2015 11:56 AM
731	Do you have a collection piece in place?	10/20/2015 11:56 AM
732	Within section regarding who will provide services, there should be a requirement such as: "the teacher must meet the requirements to be a highly qualified teacher in the academic content area of instruction" to ensure the students are receiving instruction from a teacher appropriately qualified to provide the content instruction. I inherited a building which had two gifted intervention specialists providing instruction to gifted students that would not be properly credential/highly qualified to provide the same instruction to the general education population. It took two full years to finally move this person out of that position and a change in service model.	10/20/2015 11:51 AM
733	Time requirements, case load, qualification of teacher, and service options need to be in the standards. By removing the afore mentioned pieces, the quality of service has been removed. The proposed operating standards make the gifted input points system nothing more than a basketball game of getting points. Under the proposed standards, anything can count as service. We would not consider doing this to our students on the special education end of the spectrum. How are gifted students any less?	10/20/2015 11:49 AM
734	There is no description that outlines the quality or extent of gifted services. When we take away rules, there is definitely more flexibility. However, I would rather have some high standards in place that allow for flexibility. When the initial rule revision was presented in 2014 or so, there were descriptions of service models based on research and best practice. These have all been tossed out. Please add the service time as well as the class size and appropriate service models (all of the standards) that really describe the quality and extent of gifted services.	10/20/2015 11:38 AM
735	It is unacceptable that a non certified teacher can provide services. Doing away with minimum minutes is also very detrimental for students. All gifted students deserve real substantial service provided by a licsened gifted intervention specialist.	10/20/2015 11:35 AM
736	Bring back the minutes served as well as the class size rules. In special education, students have specific minutes as required in the IEP and are served via FAPE. However, with the new gifted rule; there is nothing that says students have to be served beyond any minutes. Yes - there is all kinds of flexibility for districts. When we eliminate rules and guidelines it creates all kinds of flexibility. While I'm all for local control/decisions that allow for creativity and flexibility, we also need to maintain some kind of standard of service.	10/20/2015 11:27 AM
737	District determined leaves a wide range of options which may not be enough, or not consistent across districts.	10/20/2015 11:25 AM
738	Students identified should be taught by someone with sufficient training especially in the social/emotional needs of gifted.	10/20/2015 11:20 AM
739	"District determined criteria" is too loose of a term. I want my gifted child and students to be educated by a gifted certified teacher. What specific social and emotional needs will be addressed and by whom? Is there a specific program that is based on research to help these type of students?	10/20/2015 11:15 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

740	I feel that the proposed rule is too broad and provides too much flexibility across districts. There is already a significant discrepancy state-wide with regard to the services offered to our gifted students. Because my own children are in a district that is well-off financially, they are offered opportunities that they would never receive in the nearby city school district. This is an unfair and unfortunate circumstance that will only be exacerbated by broadening the guidelines in such a way as is being proposed here.	10/20/2015 11:13 AM
741	No	10/20/2015 11:06 AM
742	Districts will use this latitude to not identify students	10/20/2015 11:04 AM
743	I disagree with the idea of flexibility. We don't give flexibility to districts with Special Needs students; why do it with Gifted Students? All this rule does is provide districts with the ability to claim they are servicing gifted, but in reality they are not.	10/20/2015 10:57 AM
744	a clearer definition of services is needed, especially with the indicator. Districts will count being served as seeing a child once a week for 20 mins. That's not really service.	10/20/2015 10:55 AM
745	Love this one-- b) An educator who has met district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students, as well as assist in the gifted identification process. Thank you.	10/20/2015 10:54 AM
746	I agree because we have the gifted indicator and the growth of these students will be measured and reported. Perhaps a rule if growth isn't met, then educators must look at acceleration as an option. This would have to be a must do, not an option.	10/20/2015 10:52 AM
747	It does not seem as if extent is addressed. Also, how will various areas of giftedness found within one child be addressed. Who will be the evaluators for the quality and quantity and performance?	10/20/2015 10:48 AM
748	I agreed with the "flexibility" question, *but this is not entirely a good thing.* It guts gifted services in a time of budget stress. Our district put out a survey to the district of "what should be preserved" in an era of budget cuts, and the percentage that requested to preserve the gifted services was *exactly* the number of families with kids with gifted services in the district. This is an easy issue to cut back on because it looks like an entitlement for those special kids. It's not. It's a lifeline for many of these kids, addressing everything from academic to crucial social-emotional issues. The numbers of gifted kids who suffer from anxiety, depression, or commit suicide are sobering. "Quality and extent:" Providing service by teachers not qualified as a GIS will gut gifted services. Few teachers have the content knowledge, understanding of asynchronous development, twice exceptionalities, or the social-emotional needs of these children. Being pulled into an isolated environment even a few hours a day can provide these kids with a sense of normalcy. The gifted resource room is one place where kids in a large school can find one another and finally make friends.	10/20/2015 10:42 AM
749	Where does acceleration fall into this?	10/20/2015 10:42 AM
750	Definition of Services and what counts as service. Time requirements - service can not be 10 minutes a week. A students is gifted 24 -7.	10/20/2015 10:37 AM
751	What we practice at the current time.	10/20/2015 10:36 AM
752	More clarity on standard guidelines is needed.	10/20/2015 10:32 AM
753	More gifted teachers are needed.	10/20/2015 10:31 AM
754	District determined criteria for an educator to be able to provide service is extremely vague therefore some districts will not take into account the training that would be best practice for working with the gifted students.	10/20/2015 10:30 AM
755	In my opinion, the proposed rule provides too much flexibility in how districts serve at what will most likely be to the disadvantage of the students. The way in which the proposed rule is now there are no guidelines as to what service is and eliminates any accountability to the amount of time that a student should receive service. It is important to understand that gifted students are gifted every day, all day. The proposed rule does not provide ANY direction for quality or extent of gifted services. There should more guidance provided such as setting options, involvement of a trained Gifted Intervention Specialist, and minimum number of minutes served.	10/20/2015 10:22 AM
756	Most district resources are stretched thin. Requiring classroom teachers to do all that a gifted teacher should do is unreasonable. Gifted resource teachers should be available to all gifted students.	10/20/2015 10:18 AM
757	Quality and extent of gifted services should be provided by a gifted intervention specialist who has obtained a gifted endorsement through extensive course work at an accredited institution.	10/20/2015 10:18 AM
758	I have been concerned in my current district because our gifted teachers going through endorsement were told a California online series of courses would count and then, after they took the courses, were told they would not count. They are very discouraged, as am I, and do not care to continue. They are excellent with our gifted students and this is a shame. I also have another teacher who went through an endorsement program in Georgia and her courses are not being accepted in Ohio. She is also excellent with gifted students and this is a shame. I offer in house PD with the option for CEU or Ashland credit. It seems that this may count for qualifying teachers to count as serving gifted students.	10/20/2015 10:16 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

759	Keep current language	10/20/2015 10:15 AM
760	I think quality and extent of gifted services should be made more clear. Schools will try to skirt the rules if not made clear.	10/20/2015 10:14 AM
761	Again, very little guidance and too many options for districts to get around offering their gifted students the appropriate curriculum or instruction. This will cause some districts to offer even less to their brightest students. This is a huge mistake and could take us back to a time when Gifted Programs were non-existent.	10/20/2015 10:05 AM
762	Excessive flexibility in the provision of services to gifted students often leads to no provision of SPECIALIZED services for gifted students. Increased rigor or advanced course work do no take in the learning and social needs of gifted students. Just as districts are required to have highly qualified individuals provide individual services to special education students, the same standard should hold true for gifted students. Districts receive funding for gifted students, but the "flexibility" in how that funding is used, shortchanges the gifted population.	10/20/2015 10:02 AM
763	I think I agree. I would like an easier to read summary. That's cumbersome to get through.	10/20/2015 9:44 AM
764	districts can call pretty much anything a service without clarifying what type of HQPD is needed for regular ed and then districts are not coding with integrity in order to boost score on gifted indicator, no time requirements for service...so 20 minutes a week could be your child's gifted service that is reported to the state???!!! NOT acceptable.	10/20/2015 9:42 AM
765	Need to specifically say what it means for a general education teacher to meet the requirements to work with gifted students. If not, teachers will be given gifted students and never receive training, this must be very specific.	10/20/2015 9:41 AM
766	Are services mandated? Time allotment for services?	10/20/2015 9:32 AM
767	No.	10/20/2015 9:32 AM
768	More accountability as to who can provide gifted services and what can count as gifted services. With the proposed plan there will be a significant decrease in the QUALITY of gifted services. There is no accountability to be sure that gifted services are being provided by a TRAINED, CERTIFIED gifted teacher. Highly Qualified Teachers are required in all areas of education, why should gifted education be any different?	10/20/2015 9:30 AM
769	Having someone who is not a certified gifted teacher providing services is a slippery slope. The language that opens it up to "district criteria" is going to dilute the qualifications of those providing services.	10/20/2015 9:28 AM
770	Allowing the individual school districts to determine service options is appreciated.	10/20/2015 9:27 AM
771	Only provide some guidance on "district approved educator"....that seems a little loose.	10/20/2015 9:25 AM
772	There should be a requirement for a number of hours per week. There should be a requirement for a trained gifted specialist unless there is a clear reason why such a person is not the best person, i.e. specialized musical instruction.	10/20/2015 9:25 AM
773	districts can call anything service without any parameters /requirements for HQPD for regular ed and then people are not coding with integrity in order to boost score on gifted indicator, no time requirements for service...so 20 minutes a week could be your child's gifted service that is reported to the state...NOT acceptable!	10/20/2015 9:24 AM
774	This allows districts to define what gifted services are. This will create clear and alarming inconsistencies across the state of Ohio. Ohio already does not provide the protections for gifted students that some other states do (many other states write IEPs for gifted students). This plan does nothing to ensure gifted services are of a high quality.	10/20/2015 9:21 AM
775	Gifted students should be clustered so they receive academic instruction at their level on a daily basis. My daughter has been identified as gifted since kindergarten and has never received accelerated classes and furthermore has never received any services other than being identified as gifted every year!	10/20/2015 9:20 AM
776	There should be information on making sure the Childs needs are met throughout their education. My child received gifted education in elementary school but did not in middle or high school.	10/20/2015 9:19 AM
777	Gifted students should be serviced by certified Gifted Teachers only.	10/20/2015 9:19 AM
778	No	10/20/2015 9:16 AM
779	Gifted students' needs to be considered as important as any other student. Many times the staff members approved by the district to meet criteria seem to do so on paper only. There needs to be more accountability and training. research has shown over and over that highly gifted children need to be with other highly gifted children. Many times "service" seems to amount to assigning independent research or "projects", not necessarily appropriate to meet the needs of many gifted children, especially the twice-exceptional population. Students then have the perception that they simply have been given "additional work". We need self-contained programs, with well-trained professionals. Gifted students also need to be taught.	10/20/2015 9:12 AM
780	Please consider, that some students may not need a specialized social / emotional component, especially high school students. There should be flexibility with this, as every student has different needs, and many are very adept and in tuned socially / emotionally.	10/20/2015 9:07 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

781	Caseload restrictions and direct service contact time for gifted students? District identified personnel? REALLY?!	10/20/2015 9:06 AM
782	Quality and extent of gifted services is too broad. The fact that we have to identify, but not serve gifted students is a disservice to this group of special needs students.	10/20/2015 9:05 AM
783	I am happy to see this statement: An educator who has met district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students, as well as assist in the gifted identification process. This is because we do not have gifted units - we do our own thing with offering opportunities for students. I do not like how the WEP section is worded - it implies that everyone who is identified should be on a WEP even if we do not have gifted units. We do not use WEPs and have no plans to do so.	10/20/2015 8:59 AM
784	I like the flexibility of the qualified educator. This allows us to find someone with the endorsement of find a teacher which meets a criteria we set forth. There are very few teachers with the endorsement and very few universities that offer the endorsement.	10/20/2015 8:59 AM
785	Please don't limit the services provided by overwhelming districts with paperwork/reporting.	10/20/2015 8:56 AM
786	General ed classroom teachers have little to no background on gifted students through their college coursework. The new rule would take away the support of a GIS or coordinator if the district determined that the teacher was capable of serving gifted students. That's a vague standard and certainly subject to a variety of interpretation. In addition, the new draft doesn't specify what constitutes service. Could it be a field trip or an enrichment activity once a week for 15 minutes? There is no time requirement and no instructor credentials. While this gives the district flexibility it also dilutes the service.	10/20/2015 8:52 AM
787	I agree as long as the quality and/or progress is measured for each student per their WEP. It is difficult to say that gifted children are being provided "quality service" when their service is only "differentiated" (compared to the other options of service).	10/20/2015 8:52 AM
788	no	10/20/2015 8:52 AM
789	Unfortunately this must be mandated or they will not be served. I am concerned that there will be some reluctance to identify students if there is more work on the classroom teacher.	10/20/2015 8:51 AM
790	Districts should use only certified gifted intervention specialists. Districts should be required to provide minimum intervention time for gifted kids. Districts should be required to provide intervention supports to older kids on an as-needed/counseling-type basis, outside of the typical classroom. Parents should be a part of the gifted written education plan, rather than just being informed and asked to sign.	10/20/2015 8:49 AM
791	none	10/20/2015 8:48 AM
792	When there is no specificity regarding gifted services, it allows districts to choose not to serve their gifted population. The proposed new standards only require the identification of students with one test during the K-3 grade band and one whole grade screener during the 3-6 grade band. The proposed standards, since there are no limitations, allows for any classroom to be classified as "gifted service," thus making it no differentiated service whatsoever. "Gifted" is included on the special education spectrum for a reason, when a child is two standard deviations below on a standardized test, that child is seen to have "special needs" well, that is the same for a child who is two standard deviations above the norm on a standardized test. Their special needs are merely different and we need to have special services and trained staff who are able to meet the needs and challenges that the "gifted" population present. With the new operating standards, it is saying that gifted children will be fine in the regular education class with no help from a gifted intervention specialist. Would this happen with children on the other end of the spectrum, I think not.	10/20/2015 8:47 AM
793	The lack of specific training/pd required to allow regular education teachers to serve gifted students is the most concerning area in the proposed changes. Regular education teachers should have some gifted professional development to ensure that they are equipped to meet the needs of the gifted students. Without training it is likely that the teachers may call it honors- but not include rigor, depth, and pacing modifications.	10/20/2015 8:43 AM
794	To suggest that districts do not need to have individuals who do not have gifted education credentials is an insult to the profession. The coursework prepares teachers to know how to work with gifted students. It is critical to the teacher's and the student's success. With the proposed language, districts will be allowed to say that they are providing more services when, in fact, they are most likely doing the same thing they have always done. "District-determined criteria" would imply that gifted education programs are not needed, thus impacting our higher education programs. To say that districts can decide if someone is qualified to work with gifted students is like saying that someone who likes books can operate a library or someone who likes to listen to students can be a guidance counselor. I am absolutely appalled at this proposed language regarding credentials. It is a dismantling of the current standards and is not even close to NAGC best practices or exemplary standards.	10/20/2015 8:41 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

795	I am all for flexibility and this rule clearly describes that. It needs a lot of language in this section on what HQPD looks like. We switched to a gen. ed. model in 2012 and have seen a lot of success, but it depends heavily on a highly qualified, licensed GIS/coordinator providing the HQPD. HQPD is clearly defined by ODE, so it should not be difficult to include that language and list the providers who can supply it (licensed GIS or endorsed Gifted Coordinators, whether in house or provided by an ESC.)	10/20/2015 8:40 AM
796	Yes get rid of them until you fund them.	10/20/2015 8:40 AM
797	I am glad that you recognize: An educator who has met district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students, as well as assist in the gifted identification process. As a district who does not receive state money for gifted programs and units (we only identify), that doesn't mean we don't offer opportunities for our students, such as differentiation, high school credit in 8th grade for Spanish 1 and Algebra 1 and many college credit plus classes offered at our high school campus. I don't like the way the WEP section is worded as it implies a WEP is needed whether or not you have a gifted unit. We do not use WEPs and have no plans to do so.	10/20/2015 8:31 AM
798	Removing all service requirements in terms of minutes will have a negative effect on students. Too much flexibility means just about anyone can provide gifted services if a district decides to go down that path. Why remove every meaningful input while focusing just on outputs?	10/20/2015 8:28 AM
799	Fund the implementation of the services at an appropriate level.	10/20/2015 8:28 AM
800	If /when a student is getting gifted services in a gifted classroom, is there really a need for a WEP for each student? The expectations and differentiation occurs in the classroom setting, therefore no need for a WEP.	10/20/2015 8:26 AM
801	Flexibility in providing services is huge; I appreciate this change.	10/20/2015 8:25 AM
802	The old rules about who can serve and in what setting were very confusing. The new service guidelines APPEAR to be much more flexible. It seems as if we can come up with a variety of service models, so as long as we can explain how these students are being served, we're good?	10/20/2015 8:25 AM
803	Better than the old rules in terms of flexibility	10/20/2015 8:25 AM
804	I believe 2b is problematic as it gives districts the choice of who has sufficient knowledge. It allows more flexibility but without some oversight it may be one of those things that some districts take advantage of. I believe that teachers of gifted students should be credentialed or be provided with involved professional development in the area. b) An educator who has met district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students, as well as assist in the gifted identification process.	10/20/2015 8:21 AM
805	Fund the appropriate services.	10/20/2015 8:20 AM
806	Make the same rules for private and online schools, all schools the same.	10/20/2015 8:18 AM
807	No	10/20/2015 8:15 AM
808	Yes. Acceleration should count as a student receiving gifted services each year the student is accelerated. Currently, state law (as you reference) allows acceleration to count but ODE has a rule they created that only allows for it to count the first year a student is accelerated. A student who is accelerated (e.g. subject level) will receive an education in that subject far greater than what we could provide with a day or two of gifted enrichment per week.	10/20/2015 8:11 AM
809	It should be made clear that if a student is identified as gifted they should receive serves and that the district is not able to have their own set of qualifications to receive services.	10/20/2015 8:09 AM
810	Yes. Stop trying to put gifted education into the hands of people who have not obtained credentials in gifted education. All that does is water down the expertise and expectations of those who instruct/facilitate the advancement of gifted students. We have seen this over and over: teachers with classrooms of students who span the entire spectrum from low, needing intense remediation, to those who are gifted and already past the grade level curriculum. We all know what will happen in these classrooms--the gifted kid gets placed in a corner somewhere with a workbook and is expected to learn independently. Teaching is a profession; we should treat it as such. To not insist on teachers who have credentials in gifted education is like expecting the family doctor to perform surgery in addition to the regular duties associated with a family practice. Too overwhelming. Too hit or miss. Too little for our gifted students.	10/20/2015 8:08 AM
811	"An educator who has met district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students, as well as assist in the gifted identification process." This is too vague! Under this description, a district can give someone a couple of hours of PD and deem them qualified -- but gifted is too complex for that approach to be effective. There need to be some specific guidelines for training teachers to provide services for gifted kids. Also, the time component is missing, and is critical. Under this description it seems that a school could set up a weekly 30 minute pull-out enrichment session and call that gifted services.	10/20/2015 8:05 AM
812	List of those activities/engagements in public school that qualify as gifted services. (For example, Solo and Ensemble Festivals for music students)	10/20/2015 8:05 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

813	NA	10/20/2015 8:04 AM
814	It's not flexibility. It's undefined. Some districts will do well. Others will do poorly. Is inconsistency with our most talented students your objective? Look at the finances of each district. Some are doing well. Others are failing. Do you really want to leave this much discretion about our most promising students to chance? Really bad idea.	10/20/2015 8:01 AM
815	"An educator who has met district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students, as well as assist in the gifted identification process." This is not always the best way to serve the gifted. A district should provide a specialist as the teacher resource to these children. Many teachers are not trained to teach the gifted. Yet, the way some districts will interpret this will be to have a teacher who will implement very little to serve these gifted students.	10/20/2015 7:57 AM
816	The cost in providing dedicated staff to meet all of the requirements and needs of the gifted program presents challenges to small districts like ours.	10/20/2015 7:57 AM
817	If it is important, fund it.	10/20/2015 7:55 AM
818	No.	10/20/2015 7:54 AM
819	As a parent of a gifted child I think a district can meet the letter of the proposed law (and they have) with a pretty weak boiler plate WEP. I have had 2 children receive gifted services and have WEPs for many years and they almost always look the same and only address the pull out services they receive once a week, not the general curriculum that they have the other 4 days of the week. they still meet this requirement but it is not all encompassing of their school week just a select few hours.	10/20/2015 7:54 AM
820	I am glad Ohio will be requiring gifted services, not just ID. Thanks!	10/20/2015 7:53 AM
821	What does "Where gifted services are reported to the department" mean? Does this still hold the same requirement of "identify but not have to serve" requirement? I am from a small rural school and have no way to provide much in gifted education and cannot afford to have an unfunded mandate to serve gifted. "Service providers shall employ diverse and effective instructional practices according to the student's identified abilities, readiness, interests, and learning profiles, to address a range of learning needs at all levels." Personalized education is great but is expensive. I believe this wording sets up schools for law suits since we cannot teach each kid exactly the way that kid learns. "An educator who has met district-determined criteria that specifies sufficient knowledge to provide appropriate and effective instruction to gifted students, as well as assist in the gifted identification process." Does this mean that a person serving gifted does not have to have the gifted endorsement? If so that is good since there is not near enough staff with gifted endorsement available.	10/20/2015 7:51 AM
822	Provide adequate funding	10/20/2015 7:47 AM
823	It would be nice to have a clear definition of services that count toward counseling of gifted to count as being served for purposes of meeting indicators. I.e. how many hours per week/month and what type of activities qualify.	10/20/2015 7:34 AM
824	1. Providing services only during the typical school day may be challenging when students are gifted in the performing or fine arts. If the school develops and funds a program for the student to receive supplemental instruction in these fields at an extended day program, it seems that should be allowable as a service provided. It is not just the internship or mentorship that may require a flexible program - stage production or ballet lessons may need to occur offsite and outside the typical schedule. 2. Listing the staff member providing gifted services is challenging - it would require changing the WEP if a staff member is on leave or if staff are reassigned. If the service is provided through accelerated course work this becomes even more challenging. It should be sufficient to provide documentation of the service, including goals, evaluation measures, and settings.	10/20/2015 7:32 AM
825	These rules do not provide service flexibility, they provide the opportunity to pretend that a student is receiving service, while no such service is in place. The definition of service is meaningless, as it does not require anything different than standard curriculum. The definition of provider of gifted services allows personnel with NO credentials regarding the needs of the gifted to be used as providers of gifted services. Finally, extending so-called "gifted services" to the general population invalidates the classification as a "gifted service". What these abbreviated rules do is completely gut all definitions of appropriate services and trained providers. Why is this proposal being presented in isolation from the rules which it replaces? A side by side comparison would glaringly point out how lacking this version is. Statistically, gifted children are as different from the mean as children covered under special education. If this were proposed as the operating rules for developmentally challenged children, they would quickly be rejected as completely inappropriate. Why do we insist on short changing any student in our state? A Free Appropriate Public Education should be appropriate for each group of students. This rule proposal allows districts to check off a variety of "input" measures on their gifted indicator, without providing any meaningful service to the gifted students in their care. This is irresponsible and dishonest. In a sports-oriented state, here is an apt analogy...this proposed set of rules proposes that the varsity athletes need get no training beyond gym class, where they are mixed with the general population. Is this really your intent?	10/20/2015 7:24 AM
826	No	10/20/2015 7:23 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

827	Include more funding	10/20/2015 7:21 AM
828	No	10/20/2015 7:17 AM
829	It is unclear how these special services will be encouraged or funded by state.	10/20/2015 6:52 AM
830	How does a district determine a staff member is qualified if they have not earned an endorsement? This is way too broad and you water down gifted education doing this.	10/20/2015 6:35 AM
831	The gifted plan provided per student seems quite vague and translatable by various parties in various ways. I am not proposing a standardized form, but would recommend suggestions or criteria by heading with options or examples for schools to follow.	10/20/2015 6:25 AM
832	As a teacher of special education and Noe a parent of a gifted child I have come to realize how similar the need is for clarity in what's required for districts. Gifted students truly have different brains and cannot be ignored. Right now your legislation leaves room for schools to do very little these students if they choose. Gifted students should require the attention that special education students do.	10/20/2015 6:08 AM
833	Yes, please provide the necessary dollars to schools to complete the required identification and proposed services, perhaps in a similar fashion as we have established for our special education students.	10/20/2015 6:08 AM
834	The gifted plan for students is too stringent and more paperwork that is not needed.	10/20/2015 6:05 AM
835	Unless the state intends to finance a system where one teacher is assigned the same low numbers of students as Intervention Specialists (20 per year or so), this plan is unworkable in the current high school environment.	10/20/2015 4:42 AM
836	Our district has no real gifted teacher	10/20/2015 12:18 AM
837	Remove the option for districts to determine who may provide gifted services. While theoretically this may provide "local control" of gifted services and allow great educators who do not have a gifted endorsement to teach gifted classes, it also removes any sort of minimum training level for who may provide gifted instruction. Especially when money is tight and levies do not pass, this allows for unqualified teachers to begin teaching gifted classes to save money, with absolutely no oversight from the state level. Gifted courses from district to district will end up varying tremendously. Again, these standards are so vague as to be useless. A district could make an argument that sending a teacher to a half-day training is sufficient to qualify them to teach and assist in identifying giftedness.	10/19/2015 11:01 PM
838	From what I read, it sounds like all students identified as gifted will have a written education plan. That sounds wonderful but is it realistic? The students who are identified as gifted but not attending Columbus Gifted Academy (CGA) are in regular classrooms for most of their week. If teachers cannot currently address the needs in their classrooms (which is reality) how are they going to also adjust their teaching to stick with a written plan for just a few? I guess I would rethink written education plans for kids not in CGA as their classrooms tend to have many more children and their teachers are already overloaded.	10/19/2015 10:43 PM
839	Should be mandated to provide services K-12.	10/19/2015 10:36 PM
840	It is too vague when describing who is providing services to gifted students. It pretty much sounds like anyone can do it if "district approved".	10/19/2015 10:23 PM
841	This flexibility will be detrimental to my child. Please get rid of the "district-determined criteria" for teachers providing gifted services. The state certifies Gifted Intervention Specialists for a reason and that reason is that they have training in meeting the needs of gifted students. In my experience teachers without specialized training have not understood my gifted child and have not been able to meet her needs as a gifted student. Only Gifted Intervention Specialists have been able to provide a program that has challenged my child.	10/19/2015 10:09 PM
842	If the proposed rules require additional gifted services than what were done in past years, and ultimately qualified gifted intervention specialists to provide those services, it would be beneficial and important for districts to receive extra, weighted funding to properly fulfill these requirements.	10/19/2015 10:07 PM
843	The WEP should be individualized for each student with progress regularly monitored by educators and shared with students and parents	10/19/2015 10:03 PM
844	How does someone who isn't a gifted intervention specialist become an acceptable teacher of the gifted? Will the guidelines in all districts be streamlined? Students in special education have an intervention specialist, not another designated district representative. Why should it be different for gifted students?	10/19/2015 9:55 PM
845	If there is only one instructor/teacher for the school district, how do you propose that the person have a diversified program for students who have been identified in a variety of gifted areas? Ridgewood had all the students in each grade doing the same activity. As the testing requirements change the activities that the instructor planned for the students changed to help prepare for the tests.	10/19/2015 9:47 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

846	Too much flexibility. You might as well call everything gifted. Only certified gifted specialists should work with this population, not district criteria. Not everyone is trained to instruct gifted children. Shame on Ohio. You advocate for a missed assignments policy, why not a policy for gifted teachers to have the complete certification. This is unjust. Sounds like this is not being written in the best interest of our gifted children in Ohio.	10/19/2015 9:45 PM
847	What is the rationale for "district determined criteria" for personnel to SERVE gifted students yet not the same latitude for assessment and identification of students? Changes: Keep the language consistent with the 2008 standards for personnel qualified to provide gifted services	10/19/2015 9:40 PM
848	Gifted identification and service must be made by intervention specialists holding specific gifted education credentials	10/19/2015 9:40 PM
849	I agree with the changes and their flexibility, but I fear that the under-performing districts can use this vague language to not provide sufficient services.	10/19/2015 9:38 PM
850	2b) If ODE doesn't require a document that is completed by the school of "district-determined criteria" then it won't be a priority or clearly defined. It will just become whomever the district admin think they feel is appropriate for that. 3ai What is district-determined criteria? Whatever that district wants it to be? Unless it's defined, that term will be whatever the district wants it to be regardless of the priority of teaching gifted students. There needs to be a statement regarding minutes of service. In our district, buildings are diverse and gifted students will NOT get the same / consistent service across the district unless it's mandated in the Ohio Revised Code. In fact, as it is currently written, I see students at one building in our district receiving a lot of service based on their need, and in another building NO service being offered. Simply not fair for those identified gifted students. Put students first as the priority. If there are identified students and service is offered in the district, it should be offered district wide so that all identified gifted students are given the same opportunities, regardless of numbers of students identified; minorities, disadvantaged students, ESL students, twice exceptional students, etc.	10/19/2015 9:35 PM
851	We need to define the quality of gifted services, including what setting they will be provided in (pullout or not). We need services provided by people certified in gifted education.	10/19/2015 9:29 PM
852	No I don't have specific changes for the proposed rules related to services	10/19/2015 9:17 PM
853	This is way too vague in terms of service providers and allows for very lax vetting of teachers of gifted students. Teachers of gifted students need more than general professional development in this area. The teachers of gifted students should be certified in the area of gifted education.	10/19/2015 9:16 PM
854	Many GISs do not truly understand "gifted". They label high achievers as gifted based on percentiles as opposed to CogAT or OLSAT. Many times children who don't follow the prescribed rule, sit quietly, listen and repeat are labeled intellectually immature ... questioning is a critical attribute to learning.	10/19/2015 9:14 PM
855	Districts do not have sufficient funds to provide gifted services to so many students. As a district that averages 8 percent special education eligible students and 45 percent eligible gifted we would have to add several staff to serve all gifted students based on criteria listed.	10/19/2015 9:08 PM
856	Why is there not Gifted Course of Study? The proposed rule is too loosey goosey with regard to the intent of gifted services!!!!	10/19/2015 9:06 PM
857	The state should adequately fund services for gifted if they are going to require these changes.	10/19/2015 9:03 PM
858	Using educators who have met "district determined criteria" is a prescription for a district to do nothing special for the gifted student population.	10/19/2015 9:01 PM
859	What provisions are in place to ensure districts are truly selecting individuals to administer services who have training, knowledge, and expertise in gifted children? Is there going to be some kind of auditing oversight planned to ensure that district-determined criteria reflect best practices for gifted children? This is too vague and provides too much "wobble room" for districts to set their own criteria at the expense of appropriately-trained, highly-qualified teachers with knowledge and training in gifted children and their needs.	10/19/2015 8:58 PM
860	The rules need to be more specific on the criteria for who can be the instructor. The criteria for instruction should also be more clearly defined. Services should be mandated	10/19/2015 8:57 PM
861	No written education plans	10/19/2015 8:57 PM
862	After 35 years of involvement in gifted education I'm baffled...anyone a district believes is capable of teaching gifted may do so... How can you justify this without continued support from someone with gifted license and professional development required?	10/19/2015 8:49 PM
863	Example models would better "clearly describe the quality and extent" of services	10/19/2015 8:49 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

864	This will be great IF it every actually happened. I live in the South Euclid-Lyndhurst School District and it is not happening here. There is nothing for a child who can read at 3 and do long division at 5. Nothing for a child who is ready for high school level academics while in elementary school. The CCP program will help IF the colleges will really take 7th graders but many Profoundly Gifted children are ready for college level academics before 12. My son had college ready ACT scores at when he was 10.	10/19/2015 8:48 PM
865	The proposed rules are much too vague. They are way too open ended. Guidelines need to be more specific. If the rules are too vague and open ended then the quality of services will suffer because just about anything will be able to be called service.	10/19/2015 8:32 PM
866	Gifted students need specialized instruction and should be grouped with like minded peers. By not having the service settings listed, gifted students can be grouped any way possible without a person specialized in gifted education. This new proposed standard is just basic education. Gifted students struggle in the regular classroom and without a challenging curriculum, many fall behind or worse. Gifted students need a teacher who is trained in their needs and understands this demographic. A regular education teacher is not specialized in gifted education.	10/19/2015 8:29 PM
867	#3. Written plan! We do not need written IEP type of plans for gifted children, unless you can get the state to fund additional teachers to meet more specifically stated needs?	10/19/2015 8:23 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

868

Districts have maximum flexibility because anything goes with these rules. Specific thoughts: Minutes/caseloads: The lack of minutes and caseload requirements is concerning. I returned to Ohio in 2005, which was during a time when there were no minutes requirements for service. During that time, districts provided services in a variety of formats and periods of time. Some districts provided services one day a week to students. Others had special classes two hours a week. Some a mere thirty minutes a week, and others two or three afternoons afterschool per year. The inequity experienced by Ohio's students was not just evident between districts. Even within districts, services to students in various buildings were dependent on administrator support, scheduling concerns from classroom teachers, parent pushback, and availability of space rather than considering the academic and affective needs of gifted children. Students in a district's building on one side of town may get an hour of service each week while students in a building on the other side of town were meeting with a gifted specialist daily. The inequities were vast, parents had no way of really knowing how well their students were served, and there was no way to determine what elements constituted effective service. In 2008, the new standards outlined the time requirements to truly consider some settings a service. These were based on what research tells us about effective services for gifted students. Sustained significant service times are required for gifted students to have the opportunity to truly dig into the academic work at their ability level. Yes, some districts balked at the 2008 standards because it required them to make a commitment one way or another. But, it has become easier to find the service models that are most effective with students in Ohio. And, let's not forget, reinstating these minute requirements does not create any additional burden on a district. Districts can still choose WHICH service model to implement or even still choose to not implement ANY service model since service is not mandatory. The minutes requirement simply means that a district must provide a meaningful service if it is going to on record of providing service at all. The reinstatement of class size and caseload limits is common sense. In an April update to the operating standards for general education, a 25:1 student to teacher ratio was included. Why would something similar not be included for a population of students with a special learning need? The current standards specify 20:1 for elementary with an 80 student cap. That could be modified to 25:1 with a 100 student cap to align with general operating standards and still ensure that gifted specialists responsible for the individual interventions for gifted learners are able to devote the attention needed for appropriate planning of those instructional activities and supports. Definition of service settings: Removing the language erases any and all guidance to districts on potential best practices for gifted education. In my work with administrators, parents, and teachers, they rely on the language in the operating standards to know what options are available and to understand and interpret the level of service provided by districts. I was part of the state team that created the gifted indicator. One safeguard left in place to ensure that the indicator has any utility is a definition of service in the operating standards. The "inputs" component of the indicator can be heavily manipulated without any clear definition of meaningful service. The other two pieces are, at least for now, irrelevant – the state achievement measure is not stretched enough to show gifted students are really learning, and even if it does, there is no data for this for several more years. That will be 3 full classes of gifted students we can potentially lose, if not more, due to those who disengage from learning early on. Districts will choose to spend less money on service since they will be able to boost the inputs piece by reporting token "service" rather than really ensure the outputs demonstrate meaningful learning is occurring because there will be no tangible evidence of meaningful learning. Removing the ability of districts to determine who is qualified to teach gifted students: No other special needs group can be considered served by anyone other than a teacher with the appropriate licensure. This includes students receiving special education services, English Language Learners, third grade students at risk of not meeting 3GRG, to name few. How can a state licensure based on national teacher quality standards be single-handedly dismissed? The ability for districts to determine what training is sufficient for a teacher to provide meaningful service is contrary to best practice and will create further inequities for our students dependent on which district they attend and what the district leadership values. Even in recent years, this inconsistency has been witnessed within single districts. For example, one district implemented a cluster grouping model of serving students in the general classroom. One principal in the district felt it was important for teachers to be thoroughly trained and arranged for three full days during each year plus monthly check ins between the gifted specialist and classroom teachers. The principal in the school down the road in the same district only arranged for one two hour session of professional development per year. One cannot say students in the two buildings had access to teachers with comparable background knowledge. Instead, the personal beliefs of the building leadership and the value each placed on gifted services dictated the quality of training, and ultimately the quality of services the students received. Leaving this determination up to individual districts means that such qualifications will be subject to the personal values of district leaders, will need to be negotiated with unions, and will ultimately be inconsistent across the state. How do we ensure gifted students in rural Ohio and urban Cleveland and suburban Westerville all have access to the same level of expertise behind their services? What about equity and accessibility? Language about the required qualifications of those educators providing gifted services must be reinstated. Reinstatement requirement for 75% of instruction time spent on GT: The purpose of this requirement in current standards is to ensure teachers hired and reported as serving gifted students are actually able to do just that. Even though I work in a district that is highly supportive of gifted education at a central office level, I still regularly have to help building leaders understand that specialists hired to provide direct services to gifted learners are not extra instructional assistants who can spend their day supervising extra lunch and playground periods or can be assigned to lead groups providing interventions to failing students. Buildings already have funds and personnel hired to accomplish these things, and my staff has been hired to provide an appropriate educational environment to students who are gifted. What has allowed me to ensure that all of my students across my district get the same level of attention from the staff assigned to the buildings is this rule that guarantees the gifted specialist cannot be excessively pulled for other duties.

10/19/2015 8:10 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

869	Professional development should be provided and required for anyone servicing gifted students.	10/19/2015 8:07 PM
870	I feel gifted services provided in honors classes/accelerated classes should require more small group/individual instruction	10/19/2015 8:06 PM
871	Whenever you mention advanced placement or honor courses, ODE should also include International Baccalaureate courses (although they are not solely for 'gifted' students, but for ALL students). There will be a need for staff to be trained on how to write a WEP for those supporting gifted students who have not played a role in providing services for secondary level gifted students via advanced courses, etc. Include beyond Carol Ann Tomlinson's description of how can differentiate - readiness, interests, learning styles to be sure includes Gardner's multiple intelligences AND new intelligences suggested by Sir Ken Robinson on Divergent Thinking AND Aesthetics (creative thinking in general). The latter are needed for today's careers.	10/19/2015 8:05 PM
872	I wish gifted services provided in honors classes or clusters mandated more small group/individual attention	10/19/2015 8:01 PM
873	Educators who are working with gifted children must be specifically trained to properly teach the child. This involves much more than subject certification. Just as a special education teachers must understand the specific needs of special needs children, so must the teacher of gifted children. Please do not throw us back thirty or more years in educating gifted children. This is my 45th year of teaching and I continue to teach because I know the needs of these children who are waiting to learn.	10/19/2015 7:48 PM
874	Gifted MUST be defined so ALL districts are servicing similarly and not creating their own interpretation.	10/19/2015 7:44 PM
875	Money must come if you want districts to do this right.	10/19/2015 7:43 PM
876	Could guidance be provided on possible district-criteria to be used?	10/19/2015 7:34 PM
877	The students who are held back a year in order to qualify into a school's gifted program needs to be looked in to. The parents in the Indian Hill School District have been doing this for decades, yet Indian Hill continues to earn top scores. Is this an inequity to all other public school students who are identified gifted?	10/19/2015 7:30 PM
878	Additional requirements need to include additional funding. Let's move away from Unfunded mandates.	10/19/2015 7:30 PM
879	I believe that gifted students should be guaranteed services within their district to allow them to meet their full academic potential within the school. This should be mandated.	10/19/2015 7:27 PM
880	In addition to the comments I shared in the previous section, I DO NOT believe that the proposed rules have enough detail to provide structure and regulations for districts providing services. Gifted Intervention Specialists and Gifted Coordinators have gone through EXTENSIVE training on gifted children and gifted education, and these rules allow districts to have educators working with gifted children who have not gone through even a fraction of the same amount of training. This rule does not require teachers to have any form of valid certification to work with gifted children when providing gifted service. There is too much "wobble room" for districts with the proposed rules. I understand that we want to provide districts with flexibility, but I believe that the rules are MUCH too flexible, and many districts, due to lack of funding, will find ways to provide the least amount of service by people who are not specifically trained to work with gifted children, and the gifted children will suffer as a result. I know that many qualified teachers work with gifted children in the regular classroom every day, but gifted certification and training for gifted intervention specialists and coordinators was created for a reason. The proposed rules do not take into account the value of having a background in gifted education, which in the end is what enables quality gifted educators to help gifted students in significant ways. I did not answer the first question on this page regarding the flexibility of the proposed rules because I believe that they are MUCH too flexible, and services for our gifted learners will be reduced and become insignificant during a time when we need to focus MORE attention on our highest ability learners whose needs have historically been brushed under the rug. I acknowledge that all learners are valuable, and we should invest in all of our children. THAT is why services rules for gifted education CANNOT be reduced to a VAGUE two page list that leaves an EXTREME amount of room for interpretation of the parameters for gifted education in our state.	10/19/2015 7:19 PM
881	I feel that only gifted intervention specialists should provide services. Districts will loosely set their criteria for who will provide services and our brightest students will not receive the challenge that they need. Educators not trained to teach gifted often think that more work, not higher level work, is appropriate.	10/19/2015 7:19 PM
882	Teachers should be highly qualified to teach and understand gifted students. Teachers should have a degree in gifted education.	10/19/2015 7:09 PM
883	These seem to help. They provide generous definitions. It entails proposals.	10/19/2015 7:06 PM
884	I believe the proposed rules allow for too many loop holes. It is crazy to think one gifted intervention specialist can serve an entire district. Yet, that is exactly what many districts do. We are underserving our gifted population by allowing for this. We need to have regulations in place requiring more gifted intervention specialists especially in K-5 as students are not tracked into advanced math and LA classes at this point.	10/19/2015 7:02 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

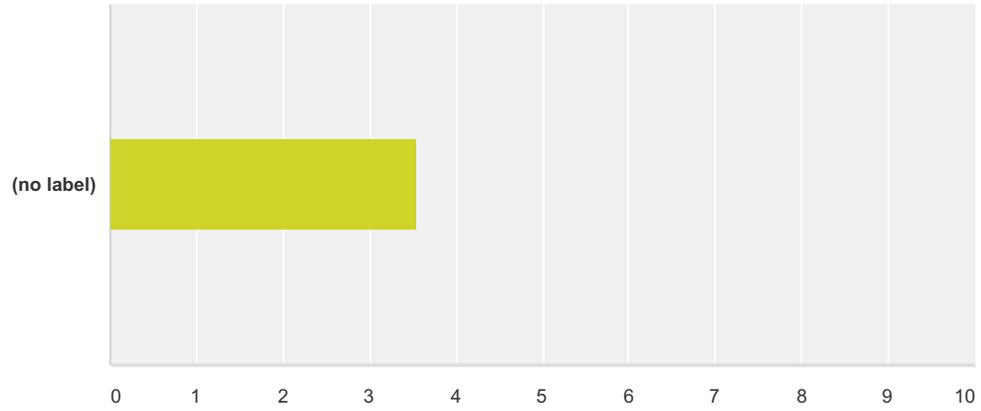
885	Gifted students should be served by teachers who have obtained gifted certification in order to provide consistent and appropriate services for the individual child. To allow regular teachers to provide services using only the training provided by districts or other such low impact training is not an acceptable form of service for my child or any gifted child. One must be trained on all aspects of gifted children in order to help these underserved students. Please do not allow anyone that is not gifted certified claim that they are providing appropriate services to my child.	10/19/2015 7:01 PM
886	There are no provisions for the number of students a gifted intervention specialist can serve and the number of minutes per week is missing. I believe this will significantly change the programs that are being offered in our schools to the point that gifted students will not receive the appropriate instruction that is necessary to their overall growth as students.	10/19/2015 7:01 PM
887	No	10/19/2015 6:52 PM
888	I think services should be provided by a gifted intervention specialist whenever possible. In addition, any instructor working with gifted students should have professional development in the area of gifted education.	10/19/2015 6:42 PM
889	If a district can set its own criteria for who is qualified to serve gifted students there is no guarantee they meet even basic standards.	10/19/2015 6:40 PM
890	Let's be clear here--every kid should get the opportunity for College Credit plus, internships, extensions and honors courses. That a child is identified one time on a test in our district and then has access to superior services (There own school! iPads for all! Special trips! COSI! The zoo! Special handholding from personnel.) is suspect. I have one child who is gifted and one child who is "not". Clearly, I'll be advocating for equity in the classroom and out. Children who are truly exceptional--the brilliant kid who just doesn't fit, who struggles with peers, who accesses knowledge in a brilliant, creative manner--need to be served differently or with kids just like them. But how many children is that truly? Are we not catering to a certain demographic? But my just damn smart gifted kid--well, she isn't that exceptional kid. So every kid deserves what she is getting in her gifted classroom. Every. Single. One.	10/19/2015 6:35 PM
891	Leave the rules the same...we do not need to change everything at the state level.....	10/19/2015 6:31 PM
892	There is no statement about the quality or extent of services, just the possibilities. There is nothing concrete.	10/19/2015 6:25 PM
893	Flexibility is nice but these rules allow for services to be defined completely by the district which could mean almost anything.	10/19/2015 6:23 PM
894	Services should be specific and listed. Our district continues to cut corners and claim service by writing a meaningless WEP for all students even when there is NO actual service taking place above and beyond what any other normal age peer is receiving.	10/19/2015 6:21 PM
895	should not be limited to the school day--parents want services for their children without missing their regularly scheduled classes--districts should be free to accommodate this and not be penalized as not servicing gifted students.	10/19/2015 6:08 PM
896	I like the flexibility. What I don't like is anyone can write an WEP. I believe a gifted intervention specialist should assist in this plan. Similar to that of IEPs. Intervention specialists write the IEPs and both general ed and intervention specialist are responsible for the implementation.	10/19/2015 6:00 PM
897	Yes, make certain that a child who has emotional needs due to the mismatch between gifted education and the child's abilities, has his or her emotional needs addressed on the school level. Also, consider alternative education which does not include so much in the way of excessive paperwork but more in areas of interest to the student and opportunities for mastery learning.	10/19/2015 5:55 PM
898	Please provide specific supplemental or complementary activities that will be offered to students designated as gifted. Additionally, what support services will be available to students who meet the qualifications (based on testing) but fail to perform in the traditional classroom setting.	10/19/2015 5:54 PM
899	Gifted coordinators need more support and there needs to be one at each level, not one for the district.	10/19/2015 5:52 PM
900	No	10/19/2015 5:52 PM
901	NO account is given for districts that have had to reduce or cut services due to lack of funding.	10/19/2015 5:44 PM
902	right now Parma City school did away with GATE and offers honors which any child in math can take. The identified gifted are free tutors in the class for the other children who struggle. Also with the PCSD STEM program and 1000 kids in the Pleasant Valley elementary in PCSD only 8 were in fourth grade gifted education. According to the school principal at the time STEM was a more advanced curriculum (you don't have to be identified gifted to take it, only fill an allotted slot)	10/19/2015 5:40 PM
903	I worry about the quality. I have seen "enhancement" mean extra fun activities. I wish someone had challenged my student in elementary school and beyond so he would have failed if he had not used some "productive struggle" learning new material. I'm not sure how to make that clear in the proposed rules. Perhaps a definition of quality services would help.	10/19/2015 5:37 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

904	Leaving the quality up to districts will take the rigor out of the program. The parameters must be set more clearly and with less flexibility.	10/19/2015 5:35 PM
905	By eliminating any specific requirements for service, we are going to see services decline. Please reconsider! If specifics aren't mandated, many districts across the states will not provide meaningful services for these students.	10/19/2015 5:34 PM
906	NO	10/19/2015 5:25 PM
907	The State should provide funding for the additional teachers required for service of the identified gifted students.... but that would likely be an unreasonable request	10/19/2015 5:24 PM
908	The burden of reporting assessment could be shared with the student through project based assessment rather than having the schools be solely responsible. If the intent is encourage the gifted student to use his or her gifts then having he or she be responsible for reporting on assessment provide additional opportunity to enhance those critical thinking skills.	10/19/2015 5:22 PM
909	I propose you offer stipends to those districts that are in need of additional services. Our coordinator goes above and beyond to think out of the box in providing services.	10/19/2015 5:21 PM
910	Too much flexibility can be a negative thing when working with children in the education system. Do we really want someone who is not an intervention specialist providing education to our schools best and brightest? All other students within the school districts are being served by licensed teachers, why aren't our gifted students? Just something to consider.	10/19/2015 5:17 PM
911	I think the rules are a little loose about what qualifies someone to service. A few days of PD do not make someone a GIS.	10/19/2015 5:17 PM
912	omit - iii. Include curricular and instruction practices which support the student's social and emotional needs; omit - iv. Include ongoing formative and summative assessments to differentiate instruction and to evaluate student progress toward goals; These are best practices for all classrooms for all students. Neither should be on a WEP because they are not unique to children participating in gifted services. Professional Development and ongoing support for social and emotional needs of gifted children is already a requirement in the description of services. Adding redundancy to the paperwork will not improve the educational outcomes. Focus instead on better resources for our teachers.	10/19/2015 5:15 PM
913	Gifted students should receive services from a gifted intervention specialist (teacher of record or co-teaching environment).	10/19/2015 5:13 PM
914	This is way too bureaucratic. This is about quality services to students, not meeting some arbitrary guideline by ODE. Districts are playing all kinds of games in order to "count" kids so their gifted indicator looks better and for those districts that are taking things seriously and as they are intended look bad in comparison, even though they are following the rule.	10/19/2015 5:13 PM
915	HQPD should be clearly defined. Differentiation training one time is not ongoing and shouldn't be considered adequate PD for clustering teachers. Most differentiation trainings do not specifically focus on gifted students and yet districts will count that as PD.	10/19/2015 5:12 PM
916	While I appreciate the social and emotional component being included, I do not think that mandating specific curriculum and instructional practices makes sense. Developing the social and emotional needs of gifted students is not something that can be summed up on a piece of paper. It is an ongoing, all encompassing experience that takes time.	10/19/2015 5:10 PM
917	More work and no money	10/19/2015 5:05 PM
918	No	10/19/2015 5:04 PM

Q10 The proposed rule outlines the district obligation to report on funds that support gifted education annually.

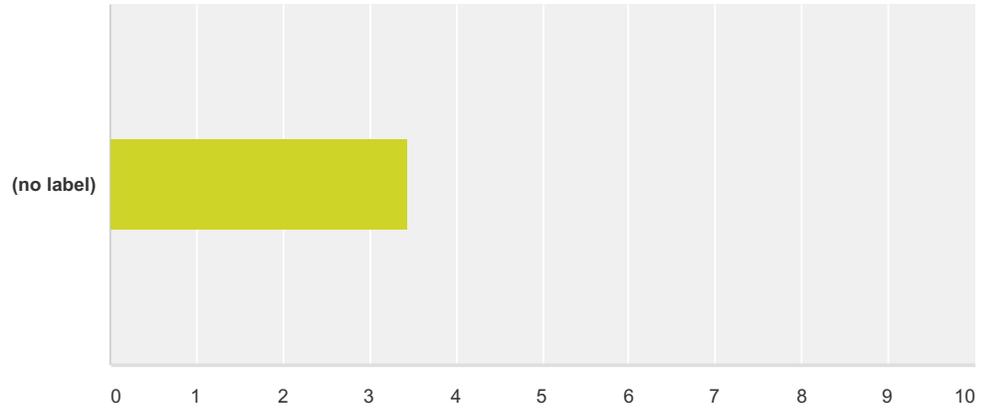
Answered: 1,919 Skipped: 1,543



	Strongly Disagree	Disagree	Neither Agree or Disagree	Agree	Strongly Agree	Total	Weighted Average
(no label)	5.89% 113	6.10% 117	24.75% 475	53.41% 1,025	9.85% 189	1,919	3.55

Q11 Gifted staff qualifications for educational service centers that receive gifted unit funding are clear.

Answered: 1,917 Skipped: 1,545



	Strongly Disagree	Disagree	Neither Agree or Disagree	Agree	Strongly Agree	Total	Weighted Average
(no label)	5.79% 111	9.65% 185	27.49% 527	48.36% 927	8.71% 167	1,917	3.45

Feedback Survey on Proposed Operating Standards for Gifted Education

Q12 Do you have any specific changes for the proposed rule related to funding?

Answered: 653 Skipped: 2,809

#	Responses	Date
1	Gifted funds allocated to districts must be 100% tied to specific guidelines and must be spent on services, staff qualified to work gifted students, identification, and curriculum ONLY for the gifted population.	11/7/2015 5:05 PM
2	I would like the gifted-service coordinators to be licensed REGARDLESS of whether the district receives money for the purpose.	11/7/2015 4:51 PM
3	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/7/2015 4:48 PM
4	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio revised code.	11/7/2015 4:11 PM
5	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/7/2015 3:52 PM
6	Gifted staffing qualifications are eliminated for districts. Is the district is expending funding appropriately on gifted students as required by ORC? As a taxpayer, I want to know that the funds allocated for gifted education are being properly spent. Gifted children are shortchanged when funding intended to further their education is reallocated to other programs. The standards should incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/7/2015 3:37 PM
7	You are asking the wrong questions here. How money is spent is directed by the GA through ORC. Allowing districts to state after the fact that they spent gifted funds on paint for classrooms where identified students sit through regular, unenriched instruction means they met the reporting obligation but not the legal, moral, or ethical obligation for the use of gifted funds. All gifted funding should be devoted to the expenses for gifted students and providing them with services, provided by qualified personnel. Gifted funds should be spent only on identification instruments, licensed gifted intervention specialists, and *qualified* gifted coordinators, meaning they possess GIS licensure and a master's degree, as hopefully the operating standards will continue to specify.	11/7/2015 2:39 PM
8	This does not spell out that all students that are identified will receive services. I would like to make sure that the funds are truly used to invest in our gifted students. This also seems to expect only certain centers will have gifted educational services available. Our gifted students deserve to have services at their school. They should not have to find a place that specializes in gifted education.	11/7/2015 1:38 PM
9	Funding parameters should be included to ensure gifted earmarked funding as stated in the Ohio Revised Code.	11/7/2015 12:49 PM
10	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/7/2015 11:59 AM
11	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/7/2015 11:59 AM
12	Increase the funding.	11/7/2015 10:50 AM
13	Gifted funds must be a distinct part of each district's budget and used by that district to hire licensed gifted coordinators and provide services. The state will supplement districts who do not have adequate funding.	11/7/2015 10:42 AM
14	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/7/2015 9:52 AM
15	Why are there different guidelines for ESCs than districts?	11/7/2015 9:41 AM
16	Once again these standards fail to provide necessary standards, definitions and guidance. In total you really missed the boat on this one. How about spending gifted funds for identification of and service to gifted children. This rule omits the requirement that ODE audit the use of funds, particularly identification funding. Recommend: Include audits in the rule	11/7/2015 9:19 AM
17	Funding must be clearly stated in the Ohio Revised Code. Why blurry it?	11/7/2015 8:52 AM
18	It is shameful that Ohio only requires the reporting of funding - Ohio needs to require that districts fund an gifted education. Districts have been allowed to neglect the academic needs of the gifted for too long.	11/7/2015 8:35 AM
19	Is all gifted funding required to be spent on staff and students? Are districts allowed to spend money on anything other than gifted staffing, gifted testing, and materials for gifted students? This should be explicit.	11/7/2015 7:33 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

20	<p>This IS NOT THE AREA TO SET LIMITS OR MAKE CUTS. Bad enough they don't have better arts after school athletics. Long ago there were more opporrunities to find something to participate and belong. Are teachers getting real time experiences with gifted children and having substantial time spent to earn certification? Or is it a one semester class or worse yet.... I heard a regular teacher say she had one day of one class discussing gifted and talented. There are a variety of social quirks in our children. We seem to get to 3rd grade just in time. My daughters and sons problems both started in PreK. Son tested genius IQ in elementary school. Teachers let him go at his own pace. After dropped out college, he stopped reading (and writing poetry) for pleasure. He knew he could get good grades, and felt no motivation since started middle school. He is now 30, works when back don't hurt, just got 2nd OMVI, refuses all religion, smokes pot, cant sleep, lives in basement, 2 cars repossessed, been on 2 antidepressants, hasn't gone on a date in over a year, and no goals. And he was the best behaved, polite, friendly child. 8 year old is defiant, destructive, disobedient, but only towards me. And I am her only parent. I do everything with and for her. We need problem solving, hardworking leaders for our future. People who are ethical too.</p>	11/7/2015 6:30 AM
21	<p>Currently, districts across the state are eliminating gifted programs. When districts are strapped for cash, gifted programs and instructors are the first to be eliminated. The proposal does nothing to ensure that funds earmarked for gifted services are used for such services. Please make funding gifted students a priority and make districts accountable for the use of those earmarked funds.</p>	11/6/2015 11:26 PM
22	No	11/6/2015 10:31 PM
23	<p>Gifted funding needs to be clearly spelled out so that districts can not inappropriately spend funds on areas other than gifted. Funding for gifted needs to be spent on the education of gifted students as opposed to dumped in the general fund and maybe used on a test or two. Spending funding set aside in the budget for gifted students shows the general public that these students are valued and worthy of education which is appropriate for them.</p>	11/6/2015 9:27 PM
24	<p>Keep the current standards.The new proposed standards failed to hold school districts accountable for how they spend the funds that have been allocated for gifted services. There need to be audits to verify how gifted funds are actually spent, and consequences that are enforced for spending those funds on other programs. The new standards eliminate the requirements for teacher qualifications and licenses for gifted education within the school districts. The quality of gifted education will decrease when the quality of the teachers decreases. The massive reduction of the current standards to become the new proposed standards appears to be largely driven by finances, rather than by what is best for gifted children in Ohio. By reducing the requirements school districts must meet, you are allowing them to easily cut funding to gifted programs, and thus reduce district overall budgets. This is not keeping the best interest of gifted students in mind. The programs are likely to be significantly less funded, or cut altogether since districts are not required to serve gifted students, but only to identify them based on the district's own interpretation of what gifted means. Furthermore, the significant reduction in oversight by the ODE appears to be financially driven as well, to cut costs at the state level in auditing, enforcement, and general oversight. Gifted students in Ohio cannot afford to have their education suffer due to lack of oversight from the ODE. Their academic and social/emotional needs must remain a priority of the ODE.</p>	11/6/2015 8:51 PM
25	<p>I do like the public reporting outlines in the current rule. I like transparency. However; you need to add • To the unit funding language from current standards; Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC). • The reinstate the provision that allows ODE to remove funds of non-compliance from current standards, as stipulated in Ohio Revised Code. • Add in All significant reporting of qualified personnel, professional development, and assistance to regular classroom teachers; thus removing any meaningful data collection to analyze the effective use of resources. Add the SAME Qualifications expected for ECS Coordinators and Teachers back into the standards for ALL Schools, why do ESC personnel have to be more qualified than those of us in district public schools? That makes NO sense. All kids deserve the MOST highly qualified staff serving them to meet their specific needs (academically, emotional/social needs, and career)</p>	11/6/2015 7:48 PM
26	<p>Again, while the new rule is clear, the rationale for dilution of discernible and appropriate standards for staff, and paring down audit requirements, is not. For example, as a concerned parent it is my view that ONLY A GIFTED INTERVENTION SPECIALIST should be considered as qualified staff. I do not want aides or other multi-purpose staff resources to be assigned to gifted education merely to "check a box" under the state rules. And we know that abuses occur when audits are not frequent, with detailed criteria. So why REDUCE these audit standards? The new rules show a clear bias for a particular political agenda that ignores the concerns of impacted parents of gifted students (like me).</p>	11/6/2015 6:00 PM
27	<p>How to ensure that a school will not use the gifted student funding to fund unrelated activities/supplies and expense it under the gifted program?</p>	11/6/2015 5:59 PM
28	<p>Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).</p>	11/6/2015 5:49 PM
29	<p>Please be vey specific or districts will find loopholes.</p>	11/6/2015 5:37 PM
30	<p>Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).</p>	11/6/2015 5:23 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

31	The survey fails to ask the real question of whether the district is expending funding appropriately on gifted students as required by ORC. Therefore, we must incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC). Additionally, the survey fails to acknowledge that gifted staffing qualifications are eliminated for districts. Gifted certification programs exist to help those working with gifted students understand their needs and how to best help them grow. Districts must be required to provide services by those who have gifted endorsements, aside from AP and accelerated courses.	11/6/2015 5:09 PM
32	The rules for certification should be the same for both ESCs and school districts. The proposed rule is ambiguous in this area.	11/6/2015 5:04 PM
33	Since there are no specific quality standards it is difficult to determine if funds would be used in a cost effective manner.	11/6/2015 4:50 PM
34	Funding amounts need to be mandated, or gifted programs will be underfunded due to other programs competing for resources.	11/6/2015 4:47 PM
35	How would this be reported to the parents? I would be interested to see the dollars spent per student especially compared to the amount of money spent on students on the other end of the spectrum. We should be investing as much if not more in our gifted students.	11/6/2015 4:26 PM
36	Make limits to ensure gifted funding is spent on gifted services. This money should not be used on other areas when it is earmarked for gifted.	11/6/2015 4:24 PM
37	It all sounds good...but how will implementation be monitored?	11/6/2015 4:20 PM
38	It should stay the same as it was before.	11/6/2015 4:20 PM
39	Are the funds being used for gifted students?	11/6/2015 4:11 PM
40	Nothing is clear here. In fact, it more and more appears that someone sat down over coffee and doughnuts and knocked out the bare basics which result in gutting all responsibility to provide gifted students with educated, specialized gifted teachers not to mention leaving the amount of service at the whim of school districts. The question becomes is any school district actually appropriately funding education for gifted students as currently required by the Ohio Revised Code???? I don't think the education of any group of students should be relegated to the dumpster. So the proposal removes the responsibility of any district in the State of funding gifted education so all requirements for funding accountability are removed. As are gifted staffing qualifications. Again, the message is that serving our brightest students is not a priority.	11/6/2015 4:02 PM
41	What is the difference in licensure between a gifted education coordinator and a gifted intervention specialist?	11/6/2015 4:01 PM
42	Ensure funding for the gifted program are used on gifted student.	11/6/2015 3:45 PM
43	Gifted unit funding must be spent on gifted educational services ONLY as outlined by the OACG and audited by the ODE under nothing less than the current standards and preferably with a more frequent audit schedule. Whether or not the gifted staff qualifications are in line is irrelevant to whether the allocated funds are appropriately used and that use is appropriately monitored.	11/6/2015 3:31 PM
44	The survey fails to ask the real question of whether the district is expending funding appropriately on gifted students as required by ORC. The survey fails to acknowledge that gifted staffing qualifications are eliminated for districts.	11/6/2015 3:20 PM
45	↵ Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/6/2015 3:19 PM
46	The language is ambiguous as to funding. Also, the qualifications for gifted licensure is limiting the opportunities for the students from specialists in the community.	11/6/2015 3:09 PM
47	The districts should invest in professional development of staff and training other classroom teachers in gifted education for those students that cannot be in a self-contained classroom.	11/6/2015 3:05 PM
48	Regarding reporting funds... Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC). Regarding qualifications for ESCs that receive gifted unit funding... The survey fails to acknowledge that on the proposed standards, gifted staffing qualifications are eliminated for districts. Qualifications are highly important.	11/6/2015 2:53 PM
49	Reinstate gifted staffing requirements for school districts.	11/6/2015 2:53 PM
50	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/6/2015 2:40 PM
51	I feel that we as a state need to be putting more money into gifted Ed not less. Districts already don't get a lot of money to provide service to our brightest and most possibly best assets in Ohio. Districts are instead encouraged to spend more money on special Ed and sports as they see more benefit to them and more money coming in to provide those services. It doesn't match what should be happening in my book.	11/6/2015 2:29 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

52	No	11/6/2015 2:28 PM
53	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC)	11/6/2015 2:27 PM
54	Incorporate regulations to be sure gifted funding is actually used for gifted children and gifted service	11/6/2015 2:24 PM
55	Would like to see state fund more, not just provide technical support.	11/6/2015 2:23 PM
56	Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students. I recommend the following: Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/6/2015 2:05 PM
57	This rule does not require any funds at all to be spent on gifted services, only for them to be reported. This does children no good who live in districts or attend community schools which choose not to spend any money on gifted services.	11/6/2015 1:32 PM
58	The survey fails to ask the real question of whether the district is expending funding appropriately on gifted students as required by ORC. The survey fails to acknowledge that gifted staffing qualifications are eliminated for districts. Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/6/2015 1:30 PM
59	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/6/2015 1:24 PM
60	This funding rule does not ensure that funding is directly linked to students. The rule should ensure that families and citizens are made aware of how our state tax dollars and local dollars are impacting student learning - not staffing at ESCs or even the district level. Reporting should transparent, accessible and provided in a format that families can understand. Citizens should clearly see how the children in their community are directly benefiting from their tax dollars.	11/6/2015 1:13 PM
61	1) The rule does not address a district's requirement to report that funds allocated for gifted education are spent appropriately and for the purpose intended by the legislature - for gifted education. This has been the case for several years even though it is required by law. 2) Gifted unit funding must be tied to licensed gifted staff. The rule does not address the need for ESCs to spend gifted unit funding appropriately or to report it as such.	11/6/2015 1:05 PM
62	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/6/2015 12:46 PM
63	1. Wrong question. You should not ask if districts are simply reporting on expended funds. What if they report that they spent \$1.00? Well, the district reported it, so it's all good, right? All those gifted kids must have been served appropriately because the district reported that they spent one whole dollar? Really? That's like the IRS telling taxpayers that as long as they report that they paid their taxes, they're good to go. If they paid \$1.00, yup, they paid their taxes. 2. Wrong question: there are no longer qualifications in the proposed rules!	11/6/2015 12:39 PM
64	Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students. • Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/6/2015 12:17 PM
65	We need to incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/6/2015 12:13 PM
66	Districts are going to play games with gifted funding. I just do not see how the ODE is going to be able to monitor what the districts are really doing.	11/6/2015 11:56 AM
67	So are you going to send the money to service centers? These do not serve children. They are just a waste.	11/6/2015 11:56 AM
68	•Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/6/2015 11:46 AM
69	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/6/2015 11:43 AM
70	I am confused about where the funding is coming from and what is an educational service center.	11/6/2015 11:26 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

71	Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, so: Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/6/2015 11:26 AM
72	ORC has funding and accountability language that should be reflected in the Operating Standards. Gifted funding is being misdirected with the knowledge of ODE. There are districts receiving allocations for gifted intervention specialists and coordinators who report no students served as documented in the state report cards. What are they doing with that money, and why is the state not taking action with those districts? This misdirection of funds would not be tolerated for any other subgroup! The legislature has allocated more than \$70 million for gifted education. ODE should oversee those funds with complete transparency and accountability.	11/6/2015 11:26 AM
73	The funding requirements can be effectively boiled down to: if there is funding, it must be made public people must have certain titles and qualifications to receive funding However there is no requirement to actually provide/allocate funding. The specific change I would recommend is to make the funding requirements, require funding. There are no required services to gifted students. An improvement would be for the state to set aside funds to support the education of these students, and to require services to be provided.	11/6/2015 11:20 AM
74	How can this be a priority for my district when the specifics are removed?	11/6/2015 11:02 AM
75	Accountability for use to directly benefit the service of gifted students must be addressed.	11/6/2015 10:48 AM
76	It would be nice to see funding spelled out for gifted education needs. Merely reporting that a district has spent money is not enough to ensure that funding is allocated for gifted students' needs.	11/6/2015 10:47 AM
77	Accountability needed to ensure funds are being spent on gifted students	11/6/2015 10:42 AM
78	• Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/6/2015 10:40 AM
79	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/6/2015 10:33 AM
80	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/6/2015 10:27 AM
81	•Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/6/2015 10:14 AM
82	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/6/2015 9:58 AM
83	Gifted funding should be spent on gifted children. The proposed rule does not mandate how the money should be spent.	11/6/2015 9:49 AM
84	It is not clear how the funding is allocated. What is the unit amount? Will the units go back to the ESC's? Gifted Funding was cut by 50% over the past few years which increases the cost to our contracted districts. the ESC has lost seven districts over the past several years because of this. Without more financial support districts will not provide gifted services.	11/6/2015 9:44 AM
85	Is this requirement that they HAVE these degrees or that they are WORKING toward these certifications? That needs to be CLEARLY STATED as our district has included people "working" toward it and then refused to help pay for getting it as promised, so we cycle thru teachers continuously which is NOT beneficial for any child. Are you spending any of this money on the actual student or just on administration? A district could put 100% of it's money into a single administrator and by your standards, that would supply gifted services.	11/6/2015 9:40 AM
86	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC). Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC.	11/6/2015 9:24 AM
87	Funding should be clear, and not subject to elimination. These are children that with proper gifted classes are going to excel and go on to do great things!	11/6/2015 9:05 AM
88	A required minimum equal to that of other special education groups.	11/6/2015 8:51 AM
89	I believe that gifted students should receive more funding for things like projects, in class textbooks, etc.	11/6/2015 8:47 AM
90	Well, not really sure	11/6/2015 8:46 AM
91	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/6/2015 8:37 AM
92	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/6/2015 8:29 AM
93	Funding thresholds should be clearly specified and specific funding should be earmarked by districts to ensure equal minimum levels of funding across districts	11/6/2015 8:09 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

94	They need to show how they are spending their money, no more loosey-goosey plan for spending. Gifted students deserve to have a curriculum and instruction that supports their learning.	11/6/2015 7:46 AM
95	Funding must remain.	11/6/2015 7:24 AM
96	More general funding for gifted services, not just for a gifted coordinator. Isn't this the population we should want to see flourish?	11/6/2015 6:48 AM
97	It lacks requirements that show that all gifted allocations be used for gifted services, including public school districts.	11/6/2015 6:36 AM
98	Today in many schools principals have created settings for gifted learners since they have not been provided money or a budget specific for these learners. Therefore how would one propose that they provide how much they spent on gifted services. Additionally with all the budget cuts and schools losing money gifted services is the one with either no budget or little budget. We NEED funding for gifted learners add it to our budget and allow schools the ability to teach our children how they need to be taught. Some schools are not so lucky to have principals and teachers who will assist gifted learners (since they are not required too) and many students have fallen behind in grades, gave up on enjoying school and even moved to private schools where they feel they can get the education they need for their student.	11/6/2015 6:25 AM
99	Will the state provide funding?	11/6/2015 6:01 AM
100	The proposed rules are a joke. They require nothing. You are failing our gifted kids.	11/6/2015 12:55 AM
101	Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students. * Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/6/2015 12:13 AM
102	See previous comments.	11/5/2015 11:47 PM
103	Professional development requirements and report of funding for this should be reported here or elsewhere.	11/5/2015 10:55 PM
104	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/5/2015 10:29 PM
105	For funding, change the words "may" and "shall" to "must"	11/5/2015 10:27 PM
106	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/5/2015 10:22 PM
107	The survey fails to ask the real question of whether the district is expending funding appropriately on gifted students as required by ORC. The survey fails to acknowledge that gifted staffing qualifications are eliminated for districts. Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students. Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/5/2015 10:12 PM
108	The survey fails to ask the real question of whether the district is expending funding appropriately on gifted students as required by ORC.	11/5/2015 10:07 PM
109	This ensures that districts will continue to be underfunded for this population. Some districts are able to serve this population without funding. What about the majority of districts who are not?! Once again, it is creating a terrible divide between the wealthy districts and those that serve already underrepresented minority populations.	11/5/2015 9:45 PM
110	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/5/2015 9:30 PM
111	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/5/2015 9:23 PM
112	It is clear from this that gifted education is not a priority.	11/5/2015 9:19 PM
113	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code.	11/5/2015 9:13 PM
114	Vague on how reporting will happen.	11/5/2015 9:09 PM
115	Funding for gifted students should be spent on gifted students. Serving gifted students needs to be a priority and this message should be clear from our ODE.	11/5/2015 9:01 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

116	Your survey doesn't actually ask if this section MEANS anything. What does this prove in the absence of anything else? "Districts got money and spent it on anything they wanted to call service and anyone they wanted to say provided it". Interesting that ESCs have personnel criteria not expected of districts...trying to kill ESCs, too? Districts looking for the easy road and reveling in the ridiculous "do whatever you want" freedom in this document are not going to turn around and contract with qualified ESC employees.	11/5/2015 5:35 PM
117	Leave the funding, staff, and opportunities available for the gifted students. Spend the time, manpower, and funds this movement has cost everyone on more pressing matters: how about figuring out what test is best for all Ohio students to take? Note, test was not plural. Too much of our students time is WASTED on preparing for tests that do not count towards anything. All of the mandatory testing is not a true reflection of what our children know, are learning, nor does it reflect what the children need to know in order to become successful adults. Let the teachers teach the material the students need and go back to one big test a year. More tests do not equal better students!	11/5/2015 4:50 PM
118	" Where educational service centers receive gifted unit funding, units must be assigned to qualified gifted coordinators or qualified gifted intervention specialists as follows:" This will force us to hire new administration staff. Not enough gifted certified administrators.	11/5/2015 4:07 PM
119	I think that the proposed rule leaves out specific details concerning gifted funding. The rule needs to include exactly how the funding will be used to make sure that funding slated for gifted is actually used for the gifted population in each school district.	11/5/2015 4:05 PM
120	This does not actually address how the money is being spent and if it is being spent appropriately. I believe that is part of the Ohio Revised Code so it should be addressed. It also does not actually state what the qualifications are, or that district gifted staffing has been eliminated. There needs to be parameters set to ensure gifted funding.	11/5/2015 3:43 PM
121	No	11/5/2015 3:39 PM
122	Taxpayers have the right to know that gifted money is being spent on gifted students and that is impossible with the proposed standards, as qualifications for gifted staffing is being eliminated.	11/5/2015 2:48 PM
123	Funding accountability is referenced several times in O.R.C. including sections 3301.01, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds are allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It send a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students. Recommendations 1.) Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/5/2015 2:46 PM
124	With the minimal parameters in the proposed rule (by what assessments are students identified, by what qualifications are the teachers designated as gifted, what quantity of time per week should be devoted to gifted education, etc), there is no way to gauge effectiveness of gifted teaching. And with no way to measure effectiveness, how will anyone know how much or how little funding is needed? Seems to me like a set-up for removing funding.	11/5/2015 2:44 PM
125	incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/5/2015 2:36 PM
126	The program should have specific children to meet the needs of their students.	11/5/2015 2:36 PM
127	We need to ensure gifted earmarked funding as stated in Ohio Revised Code.	11/5/2015 1:36 PM
128	i do not see the disbursement of funds being specifically regulated and audited . stricter guidelines are needed for funding guidelines are also needed to determine a penalty when a district is not utilizing them per their intended purpose; not providing supplies or equipment for general ed services but for additional services, staff processes specific and dedicated solely to gifted and gifted services.	11/5/2015 12:49 PM
129	As a taxpayer, parents have the right to know that the funds allocated for this particular population are being spent to specifically serve them.Funding intended to further their education should NOT be reallocated to other programs. The ODE should incorporate funding parameters to ensure gifted earmarked funding as stated in the Ohio Revised Code.	11/5/2015 12:26 PM
130	The proposed rule should include specific parameters for school districts when they spend state funds for gifted education programs, and require school districts to collect and report data on specific input measures to determine the effect on gifted services. Several sections of the ORC, including sections 3301.07, 3317.022, 3317.051, and 3317.40 specify parameters and accountability provisions for funds allocated to support education programs, including gifted education programs. The rule should include language that reinforces these transparency provisions and requires that state funds allocated to school districts for gifted identification and services support those efforts.	11/5/2015 12:09 PM
131	Funding should be same per child based on identification and variable by district. If district has lots of gifted identified they should get lots of money to support programs.	11/5/2015 12:00 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

132	Reporting on funds is clear, would like to understand how gifted is funding and guarantee funding based upon the number of students identified and requirements to hire qualified staff to properly serve that number of children. Qualifications are clear, but needs to be wording on who qualifies for instruction for gifted staff.	11/5/2015 11:12 AM
133	District funding criteria for district that employ licensed gifted intervention specialist is not specified. No consideration is given to the previous statements that districts no longer have to hire licensed gifted intervention specialists.	11/5/2015 10:42 AM
134	No consideration has been made for funding to districts employing licensed gifted service providers.	11/5/2015 10:41 AM
135	What happened to requiring certain specific levels of education or experience hours? The previous code did mention gifted licensure but also called out 3-5 years of successful classroom experience or a masters degree. I think these are good things! Why remove them?	11/5/2015 7:45 AM
136	Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students. Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/5/2015 7:03 AM
137	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC). Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC.	11/4/2015 10:29 PM
138	1) Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code.	11/4/2015 10:17 PM
139	The survey fails to ask the real question of whether the district is expending funding appropriately on gifted students as required by ORC. It also fails to acknowledge that gifted staffing qualifications are eliminated for districts. In accordance with the OAGC recommendations, the Department of Ed. should: Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/4/2015 9:38 PM
140	The big question should be, "Will districts spend allocated funds on gifted identification and service?" Currently, the answer to that is "No". In state BOE district 3 alone, there are 11 districts who received a combined total of over \$550,000 for GISs and Coordinators.....and yet reported no students served! This information is from ODE's own SFPR and District Report Cards. These districts are clearly using the money for things other than gifted services. The proposed language does nothing to address that issue. ORC provides funding and has accountability language that should be reflected in the Operating Standards. I support the idea that districts publish on their websites the amount each is spending on gifted education. Proposed language should require a breakdown of identification, GIS, and Coordinator amounts, as well as local funds that are allocated to gifted education Reinstate funding language in the current rule around unit funding and caseloads compatible with ORC.	11/4/2015 9:35 PM
141	If you continue on this path, there are no gifted staff qualifications. You eliminated them. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students.	11/4/2015 9:02 PM
142	In accordance with the Ohio Association for Gifted Children recommendations, I think the Department of Ed. should: Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/4/2015 8:18 PM
143	all kids should have the same sort of opportunities at different levels. It shouldn't take more money always to do that	11/4/2015 8:09 PM
144	✎ Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/4/2015 7:44 PM
145	Not sure if "licensure" is specific enough. Gifted education providers should have a very high level of qualification to appropriately guide, grow, nourish and challenge the gifted student population.	11/4/2015 7:29 PM
146	State must allocate funds for gifted just like they do for kids with identified learning disabilities	11/4/2015 6:09 PM
147	They use these funds currently for hiring more Chiefs to oversee. We need more Indians to get in with the kids and spend quality time.	11/4/2015 5:25 PM
148	There are no specifics on how districts are to report funding, and no reference to ORC in this section of the guidance. It is good that ESCs are required to have qualified staff. Why not districts?	11/4/2015 4:34 PM
149	The funding description needs to include the specific funding level in dollars. The gifted staff qualification needs specific description on the licence. The described requirement of the gifted staff qualification seems minimal. Parents want to higher standard for the gifted staff qualification for our children to develop their abilities.	11/4/2015 4:31 PM
150	The qualifications are clear but not specific.	11/4/2015 3:24 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

151	But why do only the ESC personnel have to be gifted endorsed?	11/4/2015 3:15 PM
152	This survey fails to acknowledge the real question of whether the district is expending funding appropriately on gifted students as required by ORC. As a former coordinator and director of a gifted program AND as an Ohio taxpayer, I have the right to know that funds allocated for the "gifted population" are indeed being spent for gifted programming!	11/4/2015 2:44 PM
153	While it may not be necessary for TAG teachers to have additional endorsements, funding for the programs to continue MUST be earmarked in order to succeed.	11/4/2015 2:21 PM
154	Funding amounts need to published to the parents with a breakdown of how much is spent on their child.	11/4/2015 1:37 PM
155	There should be provisions of funding source from the state. The requirement of gifted intervention teachers should be "holding" the specific license.	11/4/2015 1:27 PM
156	Will these same stipulations for licensed gifted instructors/administrators apply to gifted services offered in school programs? The difference between an "educational service center" and a school setting is not clearly defined.	11/4/2015 1:10 PM
157	I am concerned that districts would be required to pay for services up front in the hopes that they will meet the criteria for reimbursement after the fact.	11/4/2015 12:41 PM
158	Teachers should have special qualifications to teach gifted students.	11/4/2015 12:26 PM
159	I support robust funding for gifted education. My helping kids today we are making sure they are ready for the future. Initially, I didn't like the term "gifted" to be used for my son because I found him to be "normal". Smart, and wonderful, but "normal". I thought he could thrive and excel in a traditional classroom like his peers without special help or attention. I could not have been more wrong. While my son's intellect is a blessing, his mind works so quickly and so differently than others around him that his brilliance wasn't nurtured, but it was a hindrance making it almost impossible for him to excel in a normal classroom. He felt isolated, overlooked and was slipping through the cracks prior to finding a home in the Westerville City Schools Emerson ANT School. I encourage you to reach out to the children, PTA and educators in the building that have seen children blossom in their program. It's more than just giving students a challenge in classrooms: Gifted programming positively influences students' futures. Several longitudinal studies have shown that gifted programs have a positive effect on students' post-secondary plans. For example, studies found that 320 gifted students identified during adolescence who received services through the secondary level pursued doctoral degrees at more than 50X the base rate expectations. [3] In a follow-up report on the same study participants at age 38, 203 participants, or 63%, reported holding advanced terminal degrees (master's and above). Of these, 142 (44%) held doctoral degrees and 8 of these 142 had more than one doctoral degree. As a benchmark for this accomplishment, the authors of this study compared these rates to the general U.S. population, noting that only approximately 2% of the general population held a doctoral degree according to the 2010 U.S. Census. [4] - See more at: http://www.nagc.org/resources-publications/gifted-education-practices/why-are-gifted-programs-needed#sthash.rWfzyrMM.dpuf	11/4/2015 12:21 PM
160	I would say that using the March 2008 Gifted Framework would be my suggestion for changes to the proposed rule relating to funding.	11/4/2015 11:48 AM
161	None	11/4/2015 11:44 AM
162	Require that all gifted teachers have proper licences.	11/4/2015 11:34 AM
163	The Gifted obligation should be a defined amount of money and not one that districts can decrease as things get tight when levy's don't pass or someone wants to put turf down because the school will generate more money over the next several years for hosting band competitions.	11/4/2015 11:32 AM
164	I support the draft offered by the Ohio Association for Gifted Children. This legislation guts incentive for districts to offer quality programming for gifted children by qualified instructors. Asking whether these guidelines are clear is not asking whether these rules are good ones. This survey, this request for feedback is as shoddy as the new rules.	11/4/2015 11:28 AM
165	What is "unit funding"? That is a term I've never heard of before. Is funding from state or local entities?	11/4/2015 11:20 AM
166	Again, a drain on resources. Better idea would be to defund the ODEA and shift those funds to the districts.	11/4/2015 11:09 AM
167	ORC already addresses this and it does not need to change.	11/4/2015 10:08 AM
168	There is nothing in the rule that establishes concrete funding for gifted programs - rather it defers funding to the discretion of the districts which may or may not decide to adequately fund gifted programs.	11/4/2015 9:42 AM
169	I would just want to make sure there is enough funding for gifted services in the first place... THEN know that's it being used correctly in the schools.	11/4/2015 9:37 AM
170	Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. Recommendation: Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC)	11/4/2015 9:36 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

171	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/4/2015 9:20 AM
172	Reporting "funds supporting gifted education" does not require districts to appropriately expending funding on gifted students, so asking if the rule does a good job asking for reporting is a red herring - we need to actually have some requirements around spending. Asking if gifted staff qualifications are clear belittles the fact that staff qualifications have been all but removed from the rules.	11/4/2015 8:39 AM
173	✖ Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/4/2015 8:35 AM
174	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/4/2015 8:19 AM
175	incorporate funding parameters to ensure gifted funding as stated in the ORC	11/4/2015 7:40 AM
176	There should be provisions for how the funding is to be used within the district or center.	11/4/2015 6:02 AM
177	If my tax dollars are being provided to my district for gifted education, I deserve to know it was spent on that. I've heard about the accountability of Title I money and special education funds. Why should it be different for gifted education? I realize one is federal and the other is state. But, the accountability should be the same. The law has funding accountability. Why are they not in the rules?	11/4/2015 5:10 AM
178	*Reporting* on spending is nice but what is REALLY needed is ensuring that enough funds, according to state standard, are allocated for the gifted population and, once allocated, that those students actually receive direct benefit from those funds.	11/3/2015 10:58 PM
179	I have two master's degrees. If a survey requires that I engage in extensive research, there's a problem. This instrument is *completely invalid* You do realize this, don't you? And if you don't why are you making decisions about this? Let the teachers do it.	11/3/2015 10:25 PM
180	What exactly do you mean by "licensure?" Do teachers pay an extra fee and get a license, or must they undergo special training and/or achieve a higher college degree and pass a test, have a rigorous background check, and have continuing education? As a student I was not impressed with many of my teachers and they supposedly had "licenses." As a parent, I have so far been pleasantly surprised by my district, but can envision many nightmare scenarios with under-qualified gifted teachers as I have met them at supposedly "gifted" educational service centers. I would like to see detailed elucidation of licensure requirements.	11/3/2015 9:40 PM
181	It's hard to assess cost and financials when the proposed rule doesn't clarify that true requirements (hence costs) of a gifted instructor and what time is required for the students. I believe funding should be mandated, but I also am 100% ok with providing personal funding on an individual basis to support programs to ensure they are available to gifted students.	11/3/2015 9:40 PM
182	Regarding the first question, the survey fails to ask the real question of whether the district is expending funding appropriately on gifted students as required by ORC. Regarding the second question, the survey fails to acknowledge that gifted staffing qualifications are eliminated for districts. Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students. Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/3/2015 8:54 PM
183	The real question is are districts expending money appropriately on gifted students? The survey fails to acknowledge that gifted staffing requirements are eliminated. I recommend that we incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/3/2015 8:12 PM
184	I don't think the coordinator needs to have an admin license	11/3/2015 7:41 PM
185	The survey fails to acknowledge that gifted staffing qualifications are eliminated with these new guidelines.	11/3/2015 7:01 PM
186	You aren't showing us how the rule is changing. Specifically, what in the old language is being removed and what new language is being added. Parents need to be able to see exactly how the rule is changing if they are to adequately assess whether or not they think the changes are helpful. Because of this fault with the survey, I have to mark strongly disagree.	11/3/2015 6:53 PM
187	Does this mean if students AREN'T serviced, the district gets no money?	11/3/2015 5:41 PM
188	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/3/2015 5:36 PM
189	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/3/2015 3:22 PM
190	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/3/2015 3:22 PM
191	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code	11/3/2015 2:14 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

192	Request for the following in the Proposed Standards: *Include specific language that ensures accountability for the district: Funds appropriated for gifted students should be spent on gifted students and service supports (not easily moved to other accounts). Funding accountability with guidelines should be included.	11/3/2015 1:16 PM
193	Gifted students are just a different breed of student with their abilities to learn and process new information and their drive for learning. The educators should be required to have gifted service licensor to teach these children to best deliver the curriculum to the gifted students, and not just under the supervision of a qualified instructor.	11/3/2015 1:11 PM
194	I think that any school that receives individualized funding towards the gifted program should not be counted against them.	11/3/2015 1:08 PM
195	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/3/2015 12:51 PM
196	First Question: The survey fails to ask the real question of whether the district is expending funding appropriately on gifted students as required by ORC. Second Question: The survey fails to acknowledge that gifted staffing qualifications are eliminated for districts. Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students. OAGC recommends the following: · Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/3/2015 12:44 PM
197	No	11/3/2015 12:30 PM
198	As an aside: The level of funding does not equal the level of quality. Yet without funding it's difficult to have a quality program.	11/3/2015 12:21 PM
199	A certified gifted teacher should be required to instruct identified gifted students. The state wouldn't have a teacher not certified in special education teaching special needs students. Why is there a need for this flexibility?	11/3/2015 12:16 PM
200	Why not use the reporting standards from the ORC?	11/3/2015 11:40 AM
201	What quaifies a staff member?	11/3/2015 11:32 AM
202	If a district does not employ and assign legitimate gifted education duties to licensed gifted coordinators and gifted intervention specialists, gifted education funds will not be provided to the district.	11/3/2015 10:26 AM
203	· Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/3/2015 9:14 AM
204	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/3/2015 8:57 AM
205	More accountability is needed, not less.	11/3/2015 8:27 AM
206	Being clear and being fair are two very different things!	11/3/2015 7:41 AM
207	Although funds spent are to be reported, I do not see how these programs will be funded or even an absolute requirement to fund. In districts where funding is tight, little is likely to be done or change.	11/3/2015 7:13 AM
208	I appreciate that Ohio's language wants to ensure that gifted specialists and coordinators are actually trained and certified in that specialty area.	11/2/2015 11:30 PM
209	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/2/2015 10:59 PM
210	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/2/2015 10:43 PM
211	State specific levels of funding, as the rule reads the funding could be zero.	11/2/2015 10:25 PM
212	Regarding question #1, are districts expending funds appropriately on gifted students as is required by the Ohio Revised Code? Not sure #2 can be answered. Does this survey acknowledge that gifted staffing qualifications are eliminated for districts? As a taxpayer and a parent of gifted students as well as a gifted professional, I have the right to know that gifted funds are being allocated to serve gifted students. Are gifted funds reallocated to other programs/services? Serving our gifted students in Ohio should be a priority! Is it!!!! Funding must be addressed to ensure that funds earmarked for gifted are spent on gifted students.	11/2/2015 9:14 PM
213	My fear is that all of this is intended to reduce the amount of funds spent on gifted education. Please don't reduce spending on our best and brightest!	11/2/2015 9:00 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

214	This survey fails to acknowledge that gifted staffing qualifications are eliminated for districts. Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students. I recommend that the ODE incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/2/2015 8:45 PM
215	Districts should be required to spend as much per student on gifted education as they spend on other special needs students. Also, all the teachers working with the students in their identified areas should be certified in gifted instruction.	11/2/2015 8:45 PM
216	I do like that funding requires districts to have qualified gifted instructors	11/2/2015 8:27 PM
217	Districts should provide reason of why qualified gifted coordinator services are unavailable and published along with those respective units for public review.	11/2/2015 8:15 PM
218	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	11/2/2015 8:00 PM
219	I think districts are reporting funding, but again if there are no parameters I am unsure of the purpose of reporting.	11/2/2015 7:37 PM
220	It lists the qualifications but I question the ESC's level of services. The only time our district received services from an ESC, it was so minimal that it was questionable if it was worth it. Always trying to save a dime, doesn't mean quality services for the students.	11/2/2015 7:24 PM
221	It is not clear what an "educational service center" is. Are they something that districts may choose to have to implement the gifted services? The guidelines for staff qualifications seems contradictory to what was said in the previous rules.	11/2/2015 7:11 PM
222	Funding should be mandatory and related to demographics in that area related to age and gifted averages.	11/2/2015 5:06 PM
223	Oh yes, let's put the dollars into supervisors and ESC, not into those in the trenches. Keep the ESCs out of the loop. I like to think of them as a home for retired administrators. Contracting with ESC for services the district once provided tends to be a costly purchase of services.	11/2/2015 4:14 PM
224	Abolish state-run schools.	11/2/2015 4:08 PM
225	Reporting funding doesn't necessarily mean the funds are well-spent; vice versa, creative teachers/systems can do a whole lot with limited resources (not that I'm advocating limiting financial resources)!	11/2/2015 4:00 PM
226	Again, these are very VAGUE requirements and subject to vast differences in interpretations.	11/2/2015 3:48 PM
227	Um, what about gifted staff qualifications for districts? Is this a mistake in the rule, or does ODE not understand that gifted kids are served in districts and need trained gifted intervention specialists in districts?	11/2/2015 3:37 PM
228	Gifted students should be served by educators certified to teach gifted students.	11/2/2015 3:34 PM
229	Gifted staffing recommendations are eliminated in this version of the rule, and it does not answer whether the district is expending funding appropriately on gifted students as required by ORC, so these questions have no real answer. I'd recommend incorporating funding parameters to ensure gifted earmarked funding as stated in the ORC.	11/2/2015 3:26 PM
230	Teachers, coordinators, etc. in his section must be licensed and certified by an accredited state college or institution.	11/2/2015 3:25 PM
231	Would it not be helpful to require funding per pupil who is identified as gifted? This would allow better apples-to-apples comparisons, rather than just reporting overall funding.	11/2/2015 2:59 PM
232	Please ensure gifted funding with parameters as stated in the ORC.	11/2/2015 2:38 PM
233	Not at this time. I do think we need to know where it is used. Our district is supposed to have \$133,000.00 for gifted education and so far, there is nothing telling us when, where, or how it is being used.	11/2/2015 2:23 PM
234	Incorporate funding parameters to ensure gifted earmark spending as stated in Orc	11/2/2015 1:46 PM
235	Where does the funding come from? What are the qualifications?	11/2/2015 1:46 PM
236	What does "gifted licensure" mean?	11/2/2015 1:13 PM
237	I can't observe any problems with this.	11/2/2015 12:58 PM
238	Why require this of gifted services? Is this a requirement for other similar services? Why add undue burden to this system? This adds bureaucracy and waste.	11/2/2015 12:37 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

239	Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students.	11/2/2015 12:29 PM
240	Provide funding to ensure gifted funding as stated in ORC.	11/2/2015 12:28 PM
241	Reporting expenditures doesn't have a correlation to impact. Are students, parents and gifted coordinators satisfied with the results of the program, including expenditures?	11/2/2015 12:20 PM
242	I don't feel the expenditure should be posted online, as it can just generate more issues.	11/2/2015 11:47 AM
243	The intervention specialist shall renew credentials every 2 years and continue the credit procedure throughout the 2 years	11/2/2015 11:43 AM
244	I will suggest providing continued education for the gifted specialists working with children in the classroom. They should update their knowledge and learn to accommodate kids with different learning patterns and capabilities even within the gifted students body. We found some gifted specialists assume that all gifted kids learn the same way and expect them to learn at the same pace or in the same way, and threaten to exclude students because they are different learners. Parents and families should be able to get more involved in evaluating the work of gifted specialists by participating in surveys that attempt to evaluate the teachers' performance and make suggestion for improvement.	11/2/2015 11:25 AM
245	While improved and more transparent, this will still not ensure districts will use the money strictly for gifted or for appropriate resources and services. Funding should only be reported if it is directly tied to appropriate services for an identified gifted student. An online computer program unsupervised by a trained gifted specialist, can easily just be a babysitter for teachers and produce no forward achievement results or progressive learning for the gifted child. The use of the term "differentiated" is widely misrepresented and can easily be manipulated into meaningless adjustments even by well-meaning staff members. A very specific list of what constitutes quality service should be generated and used as a standard for reporting. It should not be up to treasurers to determine how the funds should or should not be spent. The current rule allows this and this wording will not improve that aspect of the Rule. If all the money is not spent in appropriate categories, then it should have to be returned to ODE. Treasurers should be trained and should have to report only items listed as approved by an ODE checklist that has been vetted by trained gifted staff members and other gifted "experts".	11/2/2015 11:10 AM
246	Be more specific about qualifications for gifted intervention specialists.	11/2/2015 10:53 AM
247	I think you have learning standards for every kid that include showing academic growth but I don't see any suggestions for how to monitor this for accelerated or gifted students! You are using lower cut scores to determine proficient but nothing is in place to measure growth for accelerated students. How do you measure academic growth for accelerated students using the lower cut scores? What does it show? How far above proficient, whatever proficient is that year? How do you measure academic growth for accelerated students? you don't. You need to require clearer student learning objectives and include better language for responsibly identifying student growth measures.	11/2/2015 10:48 AM
248	Not enough to simply report expenditures, but districts should specify how those funds were spent.	11/2/2015 10:38 AM
249	This is confusing. Why aren't you asking about district funding?	11/2/2015 10:24 AM
250	The use of the word "may" leaves open the option to NOT allocate funding	11/2/2015 10:14 AM
251	These questions are ridiculously worded. Why doesn't ODE ask about the funding and staffing at the district level? And why is the gifted personnel section completely eliminated? Why does ODE continue to allow districts to spend gifted funds on anything with no accountability? Why are there no audits? Why is ODE shirking from their responsibility to serve all students? My specific change in the funding section would be to require districts to spend gifted funding on gifted students.	11/2/2015 10:07 AM
252	•Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC). per OAGC	11/2/2015 9:59 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

253	<p>• Incorporate funding parameters to ensure funds earmarked for gifted education are used as intended in Ohio Revised Code. Rationale: Districts, under the 11.11.13 and the 9.11.15 drafts can spend gifted funds as they wish, which is contrary to Ohio Revised Code. Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. Almost half of Ohio's districts report spending less on gifted students than the state funding they receive. The lack of funding accountability language sends a distinct message that serving these students is not a priority for Ohio. OAGC recommends that the standards include two sections related to gifted funding. The first would be for districts under the district formula in ORC. The second would be for ESCs in the unit funding formula outlined in ORC. Currently, all districts receive gifted funds. The public has a right to expect that state gifted dollars are spent appropriately on gifted students as required in ORC. The second area of change would address funding accountability. It is important to balance the intent of both the General Assembly and the governor with the ultimate goal of ensuring the needs of gifted children are met in each district. To that end, OAGC recommends compromise funding accountability language that addresses both the concerns expressed by Representative Amstutz in his letter to the State Board in October 4, 2013, as well as Governor Kasich, who, in 2013, indicated through his veto of specific gifted staff levels that he wishes to provide more flexibility for gifted funding. OAGC recommends language requiring that funds be spent from the district gifted formula for identification, coordination, and gifted intervention specialists, which Rep. Amstutz indicated was the intent of HB 59. However, we are not requesting language with a requirement that specific levels of personnel be hired or contracted, which was the expressed concern in the governor's veto language. If funding is not addressed, JCARR may reject these operating standards given the letter of legislative intent from Rep. Amstutz.</p>	11/2/2015 9:38 AM
254	More funding for providing actual services for the students-- not just for identification.	11/2/2015 9:33 AM
255	These rules fail to acknowledge that gifted staffing qualifications are eliminated from districts. It is crucial that gifted specialists with degrees in gifted intervention are used for gifted programming, rather than teachers who have merely taken "workshops" on how to work with gifted children. Again, it is crucial that as a society we develop high level talent from our future generations to be able to move the US forward as a country of strength.	11/2/2015 9:02 AM
256	HOW ABOUT PROVIDING THE DISTRICTS WITH FUNDING FOR THE MANDATE?	11/2/2015 8:52 AM
257	My concerns: Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students. I recommend the following: Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC). ... Either that or state to the taxpayers that their money is being given away and is unaccounted for. That should go over well. (The last statement is as completely ridiculous as this proposal is.)	11/2/2015 8:50 AM
258	Parents should be provided with information as to how the funds are spent.	11/2/2015 8:48 AM
259	Yes, again, stop taking additional funds from our schools to support charters and fix Ohio's unconstitutional school funding system.	11/2/2015 8:24 AM
260	Nothing here says that the funds need to be used for direct services to gifted students.	11/2/2015 8:12 AM
261	3) c) As long as the educational service centers do not end up "punishing" the children for being gifted by taking them out of their school. This can cause them to miss opportunities with their typical peers.	11/2/2015 8:08 AM
262	Part "C" is worrisome. I would not want my child sent to an "educational center" to receive services. The money would be better spent helping teachers pay for additional classes to gain the necessary licensure.	11/2/2015 8:07 AM
263	It should be mandated how much is spent per student	11/2/2015 7:26 AM
264	Qualifications should be better defined. Certification through accredited institution should be required.	11/2/2015 7:24 AM
265	This seems to be more about "reporting of funding" than actual "funding".	11/2/2015 6:40 AM
266	Districts must disclose per pupil expenditures. Further, if students are segregated into a separate building, the costs should reflect that. So should test scores. Reporting scores back to a "home school" is deceptive.	11/2/2015 6:35 AM
267	Expenditures for gifted should not have to be posted unless it is for SPED and general education.	11/1/2015 6:53 PM
268	This rule disadvantages urban districts and there must be more allocation of resources.	11/1/2015 2:55 PM
269	Our district doesn't have a gifted coordinator so I don't think this matters to us.	11/1/2015 2:07 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

270	Nice trick questions! Why don't you ask something that is meaningful such as "Is there proper accountability for gifted funding in these rules?" The answer is no. Start over and make districts use state gifted funds as outline in law. That would be a nice start in fixing this mess.	11/1/2015 1:54 PM
271	It must be clearly required that all gifted funding must be spent on gifted services based on stringent service delivery standards, not the eviscerated standards currently proposed. Establishing gifted staff qualifications for educational service centers, but eliminating those requirements for local districts is nonsensical.	11/1/2015 12:12 PM
272	Gifted students are to be valued and nurtured, especially the ones who are gifted and also have LD that does not impair their IQ. 2E students are the most underserved class of students because it is very hard to identify them. 2E students should have a special education teacher knowledgeable of giftedness and a gifted teacher knowledgeable of the LD so that they both know how to best serve the students. Funding should be provided for Universities to adequately instruct new teachers about giftedness and LD.	11/1/2015 10:29 AM
273	See previous comments.	11/1/2015 10:14 AM
274	After reading the rules I'm still unclear of where funds are coming from.	11/1/2015 7:43 AM
275	Does this (and 2B change in previous Services section) imply that there will be a reduction in funding for gifted education, though, since districts will no longer need to hire a GIS (if 2B of that section) remains? These are students with special needs. We need to insure that their needs are being met, not just in the wealthier districts.	11/1/2015 5:23 AM
276	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/31/2015 11:14 AM
277	I think it's a good idea that the DOE will publish district expenditures on the state website. It holds the districts accountable. I also think it's very important to outline clearly what is and what isn't a gifted expenditure. The rules say that this will be determined by the department, but I don't see any examples of what the expenditures will be. My recommendation would be to make this very precise, so that districts don't inadvertently misuse the funds they are receiving. Outlining clearly what is and isn't gifted funding is very necessary. Federal title funds have clear guidelines, and gifted funding expenditures should be just as clear.	10/30/2015 5:02 PM
278	Gifted funds should be REQUIRED in this proposed rule to be spent on gifted identified students and gifted programming as intended in the law.	10/30/2015 3:14 PM
279	taxpayers and parents have a right to know that the funds allocated for the gifted population are being spent to serve them. Gifted children become the educational pawns when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio.	10/30/2015 3:12 PM
280	Incorporate funding parameters to ensure gifted earmarked funding as state in ORC.	10/30/2015 3:09 PM
281	· Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/30/2015 2:13 PM
282	There should be funds available to help support gifted teachers and coordinators in the servicing of gifted students. By not providing appropriate funding for this sub group of students, it sends the message they aren't as important as, for example, the amount of money appropriated towards special education.	10/30/2015 12:33 PM
283	This entire proposed rule is a huge concern of mine, because it dictates trained personnel for only the ESCs and not the districts!!! The district is where the rubber meets the road in the classroom. The funding is where the rubber should meet the road for the district! Also, accountability is a huge issue in general because nothing specific was previously outlined with respect to teacher licensure and service expectations that are not tied directly to the funding! If a district is allowed to service in the way that they have defined it on their own, how do we really know that they money has been spent on the gifted program versus, say, a capital need? We don't really know, and I suspect that abuse has already occurred in this regard. Also, each district is to report to the ODE the amount of funds spent on gifted education using guidelines prescribed by the department of education which aren't very specific as far as accountability is concerned. Then the ODE shall publish on its website district expenditures for gifted education? Without specificity and accountability tied to the funding, districts that don't have funds legally earmarked for gifted education may not delineate adequate funds to identify and service their students properly. As a result, when the ODE annually reports district expenditures, it may very well show a low amount dedicated to gifted education thus falsely illustrating a low need for this essential program's financial support. The inadequate wording of the proposed standards could very well set up Ohio's districts to falsely and inadvertently portray gifted education as a minimal need when it is indeed a crucial one.	10/30/2015 12:04 PM
284	Address the DeRolph ruling and create a school funding system that is thorough and efficient. Elect a new Governor - the line item veto and sketchy interpretation of the law based on an ancient court case- he is unpredictable and throws off the checks and balances. Hold all future governors accountable - Currently the Governor has lined his charter school friends' pockets with tax dollars and increased unfunded mandates in public schools, to his own benefit. Those tax-dollars-turned-profit are returned to him as large donations from these grateful beneficiaries, while Ohio's most vulnerable children continue to fall behind, local communities have lost control over their schools and the charter school experiment has failed.	10/30/2015 11:44 AM
285	No	10/30/2015 11:24 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

286	There are no requirements as to how local and city schools will spend funds for gifted personnel. GIS's or qualified regular teachers should ne named and defined.	10/30/2015 10:47 AM
287	We need to know if the funds we are receiving are being used to support Gifted Programming. Precise guidelines and auditing should be required.	10/30/2015 10:29 AM
288	Appropriate funding for gifted services should be earmarked as such. Gifted funding is severely lacking in our schools.	10/30/2015 9:45 AM
289	Yes. I think the teachers who provide gifted services to gifted students should have a gifted license.	10/29/2015 5:07 PM
290	Gifted Coordinators don't necessarily supervise Gifted teachers. Having an administrative license seems unnecessary. This could fall under a curriculum director. Making these strict guidelines forces districts too much. Funding and administrative decisions should be made locally as long as identified students are being served.	10/29/2015 3:48 PM
291	seems to go against earlyier rule with "district criteria" approved to service students	10/29/2015 3:20 PM
292	Are the funds being spent on gifted children and their education?	10/29/2015 3:19 PM
293	Current and inadequate funding precludes anything but identification	10/29/2015 12:55 PM
294	Incorporate funding parameters to ensure gifted earmarked funding as stated in the ORC.	10/29/2015 11:59 AM
295	I would like to see individual districts have to comply to the same standards as ESCs. I do not like this multi-tiered system.	10/29/2015 10:37 AM
296	Incorporate funding parameters to ensure gifted earmarked funding as stated in the Ohio Revised Code.	10/29/2015 8:45 AM
297	The funds should be earmarked for gifted education and education staff only. Gifted staff qualifications must apply to school district also.	10/28/2015 8:54 PM
298	I agree with teachers needing their gifted certification The publishing on the website seems excessive - the public can call the district if they are that concerned	10/28/2015 6:36 PM
299	Give the gifted funds to districts directly rather than funneling them through Educational Service Centers.	10/28/2015 3:53 PM
300	Funding: The proposal does not indicate how funding will be determined nor does it say that funding provided by the state has to be used to support gifted students and staff. Requiring ESCs to have licensed personnel for gifted is not encouraging to other districts to look for licensed person to work with adults and students. Units from the state should require licensed personnel no matter whether ESC or district. Requirements should be the same for all working with gifted. Not two tiers of gifted coordinators and GISs. Personnel are not addressed in the new proposal. I could be a bus driver (no offense)and be funded and give service.	10/28/2015 3:39 PM
301	There is little understanding or belief that they are receiving funds for gifted students. Providing a separate line item that allows for accountability as outlined in the law is required.	10/28/2015 3:31 PM
302	Spend the money earmarked for gifted students on gifted students! I can't imagine Title 1, special education or other earmarked funds being spent on other programs. However, that happens with gifted monies. Why?	10/28/2015 2:30 PM
303	Reinstate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC). !! Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students. ·	10/28/2015 12:51 PM
304	A reference to where "gifted licensure" is defined would be helpful.	10/28/2015 10:41 AM
305	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/28/2015 10:04 AM
306	The mandated testing utilizes most of the funding received. The testing is not only very expensive but time consuming for teachers, students, and guidance counselors.	10/28/2015 9:22 AM
307	By leaving districts open to deciding who is qualified to teach gifted students makes the definition of Gifted Intervention Specialist either unclear or obsolete. If we don't clearly define who is qualified to teach gifted children, how can we clearly define who is a Gifted Intervention Specialist? In turn, if we don't have clear parameters, how can we determine who is to receive funding? We need to clearly define Gifted Intervention Specialists and their role in Gifted Education to make sure GIS's are being counted and funded accurately.	10/28/2015 8:00 AM
308	No	10/27/2015 10:56 PM
309	No funding for gifted programs should be accepted from the DOE	10/27/2015 8:19 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

310	With no real specifications on what service is, how can the districts report funds with any real benefit to parents? The data could be related to any number of ways this "service" could be interpreted. All it says is that the staff need to be certified...there is no statement about professional development, requirements of the certification, or why they even need that if there is no rule that says service has to be delivered by a gifted certified staff member.	10/27/2015 4:01 PM
311	Yes Again, funding needs to be set up similar to special education funding. The kids are not different, therefore should not be short changed because they get things faster. Remember, these are the ones who are going to be working in our society, so don't push them aside. Let's start making them better and challenging them more, to do that we need the funds.	10/27/2015 3:41 PM
312	Districts have not been accurately reporting how gifted funds are spent for the past 5-7 years. This makes it no better. What are the requirements for gifted coordinators and intervention specialists employed by school districts? Why are only ESC personnel defined?	10/27/2015 3:28 PM
313	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC)	10/27/2015 2:53 PM
314	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/27/2015 2:52 PM
315	This document does not have any clear qualification needed to be part of the "gifted staff" so it will be impossible to tell if funding is properly used for "gifted staff". It seems to me that the district can determine whatever they want will qualify based on the standards they create. Again using funds that for gifted appropriately will be totally determined by the district so it seems pretty much that "anything goes". I don't see that the state will have any grounds to stand on that says a program doesn't qualify for gifted funds if the district shows that it meets their own standards.	10/27/2015 1:47 PM
316	Make sure that there are parameters to ensure that gifted funding is spent as stated in ORC.	10/27/2015 1:43 PM
317	These are too vague. Schools can say they are using funds for funding when in fact they are serving the high achievers and above average students in the same manner.	10/27/2015 11:30 AM
318	It has been an ongoing source of confusion that the only part of gifted services that is mandated is identification. The result is districts that identify, communicate findings to parents, and then do nothing to provide quality services. More funding and service mandates are needed in gifted education.	10/27/2015 11:21 AM
319	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/27/2015 10:55 AM
320	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/27/2015 10:44 AM
321	OAGC concerns: Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students. OAGC recommends the following: Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/27/2015 10:39 AM
322	Our district uses the majority of its funding to fund Future City for those that have been identified as gifted. Future City is supposed to be for students of all abilities.	10/27/2015 10:17 AM
323	I believe someone who has a gifted endorsement should be the coordinator.	10/27/2015 9:20 AM
324	No	10/27/2015 8:35 AM
325	Funding available for Title I schools to help support proposed funding?	10/26/2015 10:07 PM
326	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	10/26/2015 5:16 PM
327	The proposed changes are too vague and must be clearly defined to require districts to accurately account for their gifted spending.	10/26/2015 2:57 PM
328	Why do the ESCs have to follow staff qualification guidelines when districts do not? This makes absolutely no sense to me. District personnel making decisions for, and teaching gifted children must have training in the field. Without any expectations for qualified staff, service settings, and parameters for time and case load there is no way for the public to know if money for gifted education is really making any difference for gifted children.	10/26/2015 2:45 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

329	Money is currently allocated for gifted services with little to no accountability. The proposed rule still requires no reporting on how the money is used to serve gifted children. And, if districts are not required to use trained, certified gifted intervention specialists. why would there be esc qualifications? I am frustrated that my education and experience will no longer be set apart as any more beneficial than the qualifications of any other specialist. I have spent 25 years teaching gifted children, attended hours of gifted professional development, learned the "ropes" and "jumped through the hoops" so that I could offer this population of students something different, something richer, something they deserve, something they appreciate. It is time to put these children first!	10/26/2015 2:28 PM
330	Gifted coordinator must have administrative credentials and gifted licensure even if they don't directly work with students? Gifted intervention specialists must have licensure because they are directly working with students.	10/26/2015 2:08 PM
331	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/26/2015 1:20 PM
332	No.	10/26/2015 12:56 PM
333	There needs to be set funding parameters that requires districts to specifically outline where their funding goes.	10/26/2015 12:48 PM
334	While the proposed rule does address district obligations to report fund usage and gifted staff qualifications for gifted units, there is absolutely no accountability in place for ensuring that gifted funds are actually used to support gifted children nor to ensure that similar gifted staff qualifications are in place for any other possible service model. There needs to be an incentive and/or expectation that gifted funds are used to fund gifted service, and that that service be of quality, provided by truly qualified staff, regardless of the service model chosen. If that money is not required to be spent on gifted children, then 1) what makes anyone think that districts will actually do so? and 2) why even bother allotting money with the label "gifted"?	10/26/2015 12:42 PM
335	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/26/2015 11:48 AM
336	While I am able to agree with both of your questions, I do think the questions themselves are faulty. While these two things are important, the more important things to know are: A) whether funding earmarked for gifted education is being spent on gifted education and B) whether funding for gifted students is appropriate based on the needs of gifted students in the district (ie, using 10% of funds on gifted and 30% on special education even though 40% of students are ID'd gifted and just 10% special education).	10/26/2015 11:34 AM
337	It outlines when to report but not what.	10/26/2015 11:21 AM
338	no	10/26/2015 10:55 AM
339	If a district can come up with the guidelines for what constitutes a teacher to be adequately qualified to teach gifted students, than there is no continuity from one district to the next.	10/26/2015 10:32 AM
340	This needs to be more clear, containing parameters to ensure gifted earmarked funding as stated in ORC.	10/26/2015 9:51 AM
341	We are not eligible for gifted funding since we are a private chartered school in the state of Ohio.	10/26/2015 9:34 AM
342	Displaying the amount expended for gifted as opposed to other services offered in the Districts creates poor feelings between families in the schools. People think somehow their student is getting short changed. I have seen this in my own District. Unless you propose listing of service dollars for all categories a District serves it is unfair to have that one program do so. Are there requirements for ESL, Special Ed etc.?	10/26/2015 9:31 AM
343	• Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/26/2015 9:31 AM
344	Incorporate funding parameters to ensure gifted earmarked funding as stated in the ORC.	10/26/2015 9:23 AM
345	So basically, districts will be able to spend the small amount of money that is directed to gifted education any way they want. This is a total disservice to my child and all gifted students. I guess the ODE does not care about the future of our brightest students.	10/25/2015 8:04 PM
346	Make rule on reporting more clear. Needs to specify exactly what constitutes spending on gifted education. There are reports that some districts report expenditures on office equipment that might be used for some gifted kids as a gifted expenditure. There needs to be VERY clear rules on what gifted funds may be spent on.	10/25/2015 7:11 PM
347	no admin tied to the requirement of coordinator	10/25/2015 1:14 PM
348	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/25/2015 12:34 PM
349	If our district even gets any money from our tax payers (not sure that we do?) we should absolutely have to use it for the actual gifted services and teachers/admins should be qualified to direct where funds go.	10/25/2015 11:53 AM
350	N/A	10/24/2015 9:22 PM
351	Make sure gifted funds are earmarked.	10/24/2015 5:21 PM
352	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code.	10/24/2015 4:47 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

353	Whatever is reported is going to be misleading. With teachers, there is no correlation between what you spend and what you get, so one district might have 2 teachers at \$50K each and another might have 1 teacher at \$100K. The districts are spending the same but the first district can serve twice as many kids. If you report based on FTE's, that might be a better indicator.	10/24/2015 11:18 AM
354	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/24/2015 10:04 AM
355	Interesting that the ESC (educational Service Centers) must HAVE certified/credential personnel for those working with gifted students when the Districts are NOT required to have the same certification/credentialed personnel to service gifted students. SEEMS to be a disparity of the law/guide Specifically it calls for ESCs that "receive gifted unit funding, units must be assigned to qualified gifted coordinators or qualified gifted intervention specialists " and those specialists must "must have gifted licensure"	10/23/2015 11:37 PM
356	Obligation to report funds on funds - yes; obligation to report funds are being spent properly and not reallocated to other areas - no. There are no gifted staff qualifications for districts.	10/23/2015 9:32 PM
357	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/23/2015 5:31 PM
358	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/23/2015 5:13 PM
359	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/23/2015 5:05 PM
360	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/23/2015 4:57 PM
361	All your proposals include language that each district can construe to meet their own needs.	10/23/2015 4:02 PM
362	Please, incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code.	10/23/2015 3:01 PM
363	Where is the comparison of the proposed rule to the previous rule? Not enough information to answer in an educated manner.	10/23/2015 3:00 PM
364	District needs to indicate how much was spent for testing and how much was spent for service. District should not spend all their money in testing only. Also often district may use gifted money to have gifted specialist in meetings to reject parent requests for 504/IEP accommodations or accelerations and this is not well spent money. They should not use gifted funds to avoid to have to serve gifted students or 2E students. This has to stop. Also many times 2E students are found gifted by private evaluators because school refuse to use tests that are powerful enough to find the 2E students when young because that cost money. ODE should make sure District does not report money spent to identify a gifted student when the student in reality has been identified gifted by private evaluation at the expenses of parents.	10/23/2015 2:48 PM
365	Reporting on funds is not the same as requiring districts to spend money as it was intended. If there is money earmarked for gifted, it should be required to be spent on gifted.	10/23/2015 2:19 PM
366	So where is the question asking, "Are the funds allocated for gifted education being spent on gifted education?" The needs to be accountability for the use of gifted funds, and penalties for non-compliance are non-existent. What gifted staff qualifications??	10/23/2015 2:17 PM
367	see previous note	10/23/2015 2:15 PM
368	gifted funds should only be spent on identifying and servicing gifted students staffing qualifications should be same for local districts	10/23/2015 2:08 PM
369	Once again this is way to gray and offers endless opportunity for loopholes in spending at the peril of the students.	10/23/2015 1:49 PM
370	There should be more funding provided to schools for gifted education.	10/23/2015 11:43 AM
371	The survey fails to acknowledge that gifted staffing qualifications are eliminated for districts. Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/23/2015 11:09 AM
372	These qualifications and obligations seem clear but as I shared in the last response, rules the being twisted to meet requirements and not to serve students.	10/23/2015 10:44 AM
373	Gifted certification does not ensure that teachers are meeting the needs of their gifted students. I would augment that certification with the addition of only gifted adults can earn gifted certification.	10/23/2015 10:35 AM
374	No enough gifted coordinators available and those provided by ESC mainly are for testing, compliance and data collection.	10/23/2015 10:25 AM
375	There needs to be more funding for these programs.	10/23/2015 9:50 AM
376	What are the "guidelines prescribed by the department of education?" If schools receive money to educate gifted students, that money better be spent on educating gifted students!	10/23/2015 8:54 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

377	what has the research illustrated? Has there been successful or former pilot plan? Are these standards in the best interest of all children meeting these guidelines?	10/23/2015 8:11 AM
378	OAGC again neither agrees nor disagrees. The survey fails to acknowledge that gifted staffing qualifications are eliminated for districts.	10/23/2015 8:10 AM
379	The funds should be in an account that is specifically earmarked for gifted education instead of just put into the district's general fund. The money for materials, PD, etc. get spent on things like administrator pay or hiring another football coach instead of the gifted students if district aren't required to show where the money goes.	10/23/2015 7:27 AM
380	Coordinators and intervention specialists should be funded for districts.	10/23/2015 5:40 AM
381	This specifies the requirements of an ESC, but what about the requirements of district staff?	10/23/2015 4:16 AM
382	The funding language in this draft only requires the district to report what it spent on gifted education. It does not tie that funding to the amount of money received from the state for gifted education. That provides a very unclear picture of the funding. The funding needs to be tied to accountability to spend the gifted funds allocated by the state to the actual expenditures on gifted education. Gifted staff qualifications listed for ESC's are one sided and inequitable. Specifying the requirements for gifted coordinators and intervention specialists at ESC's in order to receive funding without specifying those requirements for school districts in order to receive gifted funding will create inconsistent levels of gifted services and will make a two tier system. What purpose does that serve? Requirements for gifted coordinators should exist at school districts in order to have a person on staff who understands gifted education and who can work to make school a place where our students want to stay engaged and learn rigorous work.	10/23/2015 12:25 AM
383	1. On funding reports, why are we wasting time having people document work by doing work- allow districts the time to focus on instruction and remove the waste of time spent on documenting work doing work. 2. As for the qualified staff, only those that hold a GIS.	10/22/2015 9:23 PM
384	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/22/2015 7:06 PM
385	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection. Reinstate service and staffing requirements that are in current the operating standards.	10/22/2015 5:57 PM
386	Yes, include a withdrawal clause stating that districts providing no services receive no funding.	10/22/2015 5:48 PM
387	The survey fails to ask the real question of whether the district is expending funding appropriately on gifted students as required by ORC. The survey fails to acknowledge that gifted staffing qualifications are eliminated for districts. SPECIFIC CHANGE: Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/22/2015 4:52 PM
388	no changes to the rule but the state should provide some funding for gifted education. It should not all be up to the school district to find/allocate funds. Many choose not to or to designate very little for gifted education because they CAN. Should not be a choice	10/22/2015 4:33 PM
389	This survey is meaningless without a comparison to the previous rule or any context provided.	10/22/2015 4:13 PM
390	Please do not put districts in a position where they have to hire someone who has a special license of gifted; then district are going to put money towards administrative costs and not direct it where it will help teachers and students best.	10/22/2015 4:00 PM
391	Regarding the district obligation to report on funds - the survey fails to ask the real question of whether the district is expending funding appropriately on gifted students as required by ORC. Regarding gifted staff qualifications for ESC that receive gifted unit funding - the survey fails to acknowledge that gifted staffing qualifications are eliminated for districts. Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students. Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/22/2015 3:13 PM
392	Concerns: Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students. Recommendations: · Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/22/2015 2:52 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

393	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/22/2015 2:43 PM
394	Rather than reporting the amount spent, districts should be obligated to report how funds allocated for gifted education are spent. It needs to be made clear that funds for gifted education are to be spent only for gifted identification and direct services for gifted students. Staff qualifications in the proposal for ESCs need to be applicable to districts and to ESCs: it is meaningless to have qualifications for gifted personnel at the ESC if the district can designate untrained personnel to provide services.	10/22/2015 2:29 PM
395	Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students.	10/22/2015 2:26 PM
396	Concerns: Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students. Recommend the following: Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/22/2015 2:18 PM
397	First statement: Where are the requirements that districts spend any money at all on gifted students? Second statement: Doesn't matter when any person with "sufficient" knowledge can be the actual person in the classroom. SHAME ON YOU.	10/22/2015 1:59 PM
398	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/22/2015 1:53 PM
399	Put in funding rules to make sure gifted money is used for Gifted education.	10/22/2015 1:39 PM
400	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/22/2015 1:24 PM
401	The survey fails to ask if the district is expanding funding appropriately on gifted students as required by ORC and fails to acknowledge that gifted staffing qualifications are eliminated for districts. There should be funding parameters to ensure gifted earmarked funding as stated in ORC.	10/22/2015 1:17 PM
402	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/22/2015 1:09 PM
403	I do not believe gifted coordinators need an administration license.	10/22/2015 1:02 PM
404	If the state wants to support gifted services, there needs to be additional funding to meet the requirements. Otherwise, leave gifted out.	10/22/2015 12:47 PM
405	The money spent on 'gifted' can be fudged with this method.	10/22/2015 12:23 PM
406	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code	10/22/2015 12:20 PM
407	Is the state going to provide additional gifted funding??	10/22/2015 12:20 PM
408	Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio.	10/22/2015 12:09 PM
409	How do these standards ensure that there actually is any gifted funding available for qualified staff?	10/22/2015 11:55 AM
410	Districts must be required to account for funds allocated for gifted identification and services, and to report exactly how (as opposed to only how much) the funds are used to identify and serve gifted students. The question of staff qualifications for ESC personnel is irrelevant unless the same staff qualifications are required for districts.	10/22/2015 11:53 AM
411	Sounds like the funding can only go to the specialist...what is there is not a specialist? What if the service is being provided by a regular classroom teacher?	10/22/2015 11:50 AM
412	This is confusing. Do gifted intervention specialists have to have gifted certification or not?	10/22/2015 11:45 AM
413	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/22/2015 11:42 AM
414	Although gifted education is viewed as worthy of funds by some, others oppose the use of funds towards special services for bright children. Posting fund related information on a district website is a sensitive matter and can instigate issues with those who want more funding allocated to special needs and underachieving populations.	10/22/2015 11:01 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

415	If a group of gifted students are clustered in a regular classroom what are the qualifications of that teacher and the amount of planning that needs to take place with the Gifted staff? Should that be spelled out in policy?	10/22/2015 10:45 AM
416	Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. This sends a message that serving these students is not a priority for Ohio.	10/22/2015 9:54 AM
417	This I suppose answers my previous question, but I believe will only work if required by law. If we are required to have a GIS and GIS Coordinator, it will happen, if not, then no services are going to be provided because we do not have the budget/money for items and positions that are not required. These funding requirement, I believe, contradict the services section. Either require, by law, district have a GIS that services gifted students or let the districts have flexibility in how they service gifted students, but saying it is not required and you don't have the flexibility to make service decisions without a GIS and GIS coordinator is terrible for students who are identified as gifted. They are caught in the middle and are receiving NO services. If you said a district can put together a plan for providing services based on who they believe would do the best job with these students and send in teacher credentials and lesson outlines (master's degrees in specific fields, reading endorsements, national board certification, lesson plans, etc.) then we would make sure our gifted students received services from these individuals. Since, doing these things for our gifted students doesn't count as service, no one sees the need to be deliberate and it ends up being hit or miss with gifted services/enrichment.	10/22/2015 9:45 AM
418	Survey does not address these issues. Recommend incorporating funding parameters to ensure gifted earmarked funding as stated in the ORC.	10/22/2015 9:34 AM
419	None	10/22/2015 9:29 AM
420	What about units provided to districts? Why does it just say units provided to Educational Service Centers? Is that so the units have to go through the ESC and the districts have to pay them 5% to 10% for their services out of the funds received? I don't have a problems with the qualifications for individuals, but don't force small districts to have to go through ESCs. If the district can provide, why not let it?	10/22/2015 9:08 AM
421	Incorporate funding parameters to ensure gifted earmarked funding as stated in the ORC.	10/22/2015 8:25 AM
422	Why is the wording for a district using someone they feel is qualified different that using an ESC? The district should be forced to use the properly certified personnel for gifted services as the ESCs are.	10/22/2015 7:56 AM
423	Again, if gifted falls with special education, then the gifted and talented program should be receiving funding similar to special education funding.	10/22/2015 7:24 AM
424	I believe that in the state of Ohio, there is no benefit for those going through college to get a gifted license, so I think it's going to be extremely difficult to find educators to meet the criteria. As it is, I know that, in our particular building, continuing education classes are offered just to inform and help classroom teachers deal with the needs of gifted students and not one teacher in our whole building has taken it. This class is free and provided by the gifted teachers through a PARENT organization funding it, not the school district. Some districts just do not take gifted education seriously and that needs to change. Districts need to be held accountable.	10/22/2015 7:23 AM
425	poor parents cant always pay for field trips	10/21/2015 9:37 PM
426	I don't have any changes, but I do have questions. Why are the staff qualifications included in the funding section? I would prefer to see them in the services section. I'm assuming that the annual report on funds is for the previous year, but that is not clearly stated. If the report is not for the previous year, then that needs to be stated.	10/21/2015 9:27 PM
427	The rule says "using guidelines prescribed..." but it is not clear what those guidelines are. The last line is not clear. How does an ESC determine whether the funds should go to the GIS or the coordinator?	10/21/2015 9:02 PM
428	Gifted funding is as important as the regular classroom teacher and should not be a flexible option.	10/21/2015 8:51 PM
429	Districts should be allocated monies for a gifted Intervention Specialist and money to purchase advance curriculum to meet the students learning plan. Teachers should not try to just pull materials together because their is no funding allocated to purchase needed instructional materials to use in a resource room or independent study etc.	10/21/2015 8:00 PM
430	i do not believe simply reporting the funds that support gifted education is enough to help ensure quality services for gifted students. Funds should be required to be used for gifted services based on the number of gifted children in a school district.	10/21/2015 7:46 PM
431	Ohio Revised Code specifically mentions funding several times, ensuring that parents and taxpayers/community members know that gifted funds are being used to serve gifted students. Please incorporate funding parameters that ensure that gifted funds are being used to directly service gifted students rather than broader programming for the general population.	10/21/2015 7:43 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

432	The staff qualifications seem clear, however I do not agree that it should be required that the GIS have the gifted license validation to fill a position IF they agree when hired for the position that they will work on getting their validation concurrently and in a reasonable amount of time. I did it and have been teaching and loving the gifted field ever since (almost 20 years). Before being hired to teach gifted I had not even thought of it as an option and would not have done it if someone had not seen me as a good candidate for it.	10/21/2015 7:34 PM
433	There needs to be funding for and transparency in funding for gifted programs.	10/21/2015 7:29 PM
434	The specification of funding is unclear in how districts would use the funds. How are parents/stakeholders, etc. to know whether or not the "gifted funds" are being used appropriately?	10/21/2015 7:18 PM
435	Nobody in their right mind would fund such a program. This programs excludes artistic and creative students. Why fund something that needs scrapped.	10/21/2015 7:17 PM
436	Keep measures to ensure funding is used for gifted services .	10/21/2015 6:56 PM
437	Too easy for large districts to siphon money for other uses	10/21/2015 6:18 PM
438	Start really funding gifted	10/21/2015 6:10 PM
439	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/21/2015 5:40 PM
440	Teachers who teach gifted students should also be certified!	10/21/2015 5:23 PM
441	Districts MUST be held accountable for spending gifted funds on gifted! There should be swift consequences if a district cannot show this equity. Gifted funds should not be placed in the general fund or spend on some other program!	10/21/2015 5:21 PM
442	Gifted staff should have opportunities to examine other G/T programs and meet regularly with other G/T specialists, sharing ideas and challenges. "Doubly" labelled students should also be addressed by Special Ed./and Special Needs specialists; collaboration is essential for students of this nature.	10/21/2015 4:58 PM
443	I think there needs to be an easy way for a parent to determine if their child's general ed teacher who is administering gifted services within a cluster group within the classroom is qualified to do so.	10/21/2015 4:54 PM
444	Gifted services should be mandated and funded accordingly.	10/21/2015 4:47 PM
445	If the accelerated coursework for a gifted student is not available at the school, who is responsible for funding the appropriate coursework? Can this coursework be delivered in an online format within the student's district?	10/21/2015 4:26 PM
446	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC)	10/21/2015 3:42 PM
447	A Masters Degree in Gifted Education should suffice.	10/21/2015 3:40 PM
448	I CANNOT agree or disagree with the first question because this survey fails to ask the REAL question of whether the district is expending funding appropriately on gifted students as required by ORC. I CANNOT agree or disagree with the second question because the survey fails to acknowledge that gifted staffing qualifications are eliminated for districts. Gifted staffing qualifications are ESSENTIAL in providing quality service to gifted students. My concerns are that funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. Therefore, I recommend the following: Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/21/2015 2:56 PM
449	The proposed rule indicates that there will be an obligation to report on funds spent on gifted education based on ODE guidelines but it is difficult to evaluate this obligation until we are able to review the guidelines.	10/21/2015 2:18 PM
450	Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students. Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/21/2015 2:14 PM
451	It's fine as stated.	10/21/2015 2:10 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

452	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students.	10/21/2015 1:55 PM
453	Make sure all districts are reporting funds as being spent appropriately. Should require district gifted staff qualifications for districts as well as ESCs. Need continuity and equal access.	10/21/2015 1:42 PM
454	Are districts no longer receiving funding for gifted funding? This rule says districts must report how much they spend on gifted education, but it says nothing about reimbursing them for those services. Again, if funding is gone, gifted intervention positions will be eliminated placing the responsibility for serving gifted students back on classroom teachers. Classroom teachers are already expected to do a lot, and many of them have received little to no training in the service of gifted students.	10/21/2015 1:39 PM
455	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/21/2015 1:17 PM
456	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC)	10/21/2015 1:10 PM
457	With the increase in requirements, what will be the increase in state commitment to fund the programs? It is already very difficult to find qualified, licensed gifted coordinators and teachers. Will ODE be putting forth and programs or incentives to bring more people into the field?	10/21/2015 1:09 PM
458	It is stated that both gifted coordinators and gifted intervention specialists need to have gifted endorsement. However, a district is not required to have either on staff in order to report gifted services. This seems confusing.	10/21/2015 1:04 PM
459	1. Regarding the first statement: This survey fails to ask the real question of whether the district is expending funding appropriately on gifted students as required by the ORC. 2. Regarding the second statement: The survey fails to acknowledge that gifted staffing qualifications are eliminated for districts. 3. More specifically, funding accountability is referenced several times in the ORC including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, the joint commission governing rules and regulations, JCARR, may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students. 4. Based on my extensive experience with the education of gifted students, I urge you to Incorporate funding parameters that will ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/21/2015 1:00 PM
460	Incorporate funding parameters to ensure gifted earmarked funding as stated in the Ohio Revised Code. We need to make sure that if districts receive funds to educate gifted students, that is exactly where the money should go. Not into the general fund to be spent on anything and everything. I would like to see more rules as to what the money can and cannot be used for. At the very least schools need to report EXACTLY where every dollar of funding is being spent.	10/21/2015 12:58 PM
461	Service of Gifted students is another unfunded mandate to the local tax structure. This is frustrating.	10/21/2015 12:49 PM
462	I am not sure if a Gifted Coordinator needs to have an Administration licence too. I think experience would be the most valuable.	10/21/2015 12:48 PM
463	Gifted funding needs to be spent on gifted services. We need to have standards that hold districts accountable for reporting that they are using that money to provide high quality services for our gifted students.	10/21/2015 12:34 PM
464	If funds aren't earmarked for gifted, districts with limited resources will NOT use them for gifted	10/21/2015 12:33 PM
465	Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).	10/21/2015 11:47 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

466	<p>. 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits (without the sunset provisions) from the draft of the gifted operating standards approved by the State Board of Education Achievement Committee (11.11.13 draft). 2. Reinstate and improve service and instructional settings as provided in the current standards and adjusted to some extent in the 11.11.13 draft. 3. Remove the provision that untrained general education teachers provide service unless it is an accelerated classroom as outlined in the 11.11.13 draft. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC). 6. Reinstate instruction time requirement for teachers from current standards. 7. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 8. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 9. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 10. Revise whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that is required in ORC and which exists in the current operating standards. 11. With the reinstatement of service parameters as described above, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 12. Reinstate the district service plan as required by ORC. 13. Reinstate identification and service definitions as outlined in current operating standards 3301-51-15 and adjusted to some extent in the 11.11.13 draft.</p>	10/21/2015 11:36 AM
467	<p>Districts receive gifted funding~ it is clearly stated in budgets. However, districts have not been required to report on exactly how those funds are being used to support gifted service, or gifted students. Accountability is lacking.</p>	10/21/2015 11:15 AM
468	<p>N/A</p>	10/21/2015 10:49 AM
469	<p>none</p>	10/21/2015 10:43 AM
470	<p>Qualifications should include a master's degree in Gifted but not a gifted license.</p>	10/21/2015 10:32 AM
471	<p>Other than funding source, what explains the disparity between district requirements for gifted staff and education service center requirements? Requirements should be the same, regardless of funding source.</p>	10/21/2015 10:25 AM
472	<p>Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC).</p>	10/21/2015 10:11 AM
473	<p>Are the old supervision license - acceptable as an "administrative license" if they are supervising staff as a gifted coordinator</p>	10/21/2015 9:15 AM
474	<p>State should fund gifted services in each public district at 100%.</p>	10/21/2015 8:13 AM
475	<p>Question: Why are there specific qualifications for ESCs but not for individual districts? Parents in my district are concerned that gifted funding is being spent on staff who are not licensed/endorsed in gifted. Teachers assigned to teach gifted are concerned that they are not getting the professional development and resources they need to adequately meet the needs of gifted students.</p>	10/21/2015 7:55 AM
476	<p>This in an unfunded mandate.</p>	10/21/2015 5:37 AM
477	<p>Will there be a difference in funding for districts who select credentialed individuals to service gifted children vs. the district who select teachers they state are "qualified" to teach them? I ask this because in order for Service Centers to obtain funding, coordinators must be certified with at least gifted licensure. 1) States, "Districts shall report to the department the amount of funds spent on gifted education using guidelines prescribed by the department of education." Are those going to remain consistent with what is currently in place, or are those changing? What will be the guidelines to receive funding? Will there be funding allocated for the identification and services, or will funding only be granted for the service?</p>	10/21/2015 1:18 AM
478	<p>I feel some administrators would be able to be coordinators even if they do not have the GIS licensure.</p>	10/20/2015 11:14 PM
479	<p>No description of how they will report on funds. Should reference the rule and it should be spelled out in the referenced rule, at least. Existing document provides this. Is the referenced rule going to get more detailed to make up for the loss of content in the proposed operating standard?</p>	10/20/2015 9:13 PM
480	<p>Since gifted funding levels are so small, this will have little impact on what districts do. Without requiring gifted intervention specialists for gifted education programs across the board, this will have little impact. What funding will districts receive? How will they be required to spend it? Can it just go into the district's general fund?</p>	10/20/2015 8:46 PM
481	<p>Our current gifted coordinator does very little for our school district. The person is a county employee and I truly do not understand the individual's role. I wish we could use the money for this person to hire an individual at our school. Release school's from the gifted coordinator position. Let school's hire a gifted teacher.</p>	10/20/2015 8:46 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

482	The language keeps the ESC's busy.	10/20/2015 7:34 PM
483	How will teachers be compensated for the extra work to write WEPS?	10/20/2015 7:34 PM
484	NONE	10/20/2015 5:53 PM
485	Requirements seem excessive.	10/20/2015 4:38 PM
486	don't have enough background knowledge to have an opinion.	10/20/2015 4:25 PM
487	Gifted education should be provided to students at their local schools instead of ESC's.	10/20/2015 4:18 PM
488	Reporting funding levels for GIS or GC does not align with the previous service model proposal. Reporting funding levels for gifted instruction will increase pressure on school districts to decrease this service unless the state funds these services.	10/20/2015 4:07 PM
489	I believe there needs be a minimum amount given to each district, no matter how many students the district serves. Our small district does not receive enough funding to properly serve gifted students, and therefore our students do not get the same types of services that other, larger districts receive. This is unfair. Our students did not ask to go to a small, rural school.	10/20/2015 4:07 PM
490	I know what a district is. I'm not sure what an educational service center is -- which makes it unclear in my book. I'm sure people who understand the jargon know.	10/20/2015 3:49 PM
491	More information regarding how gifted costs should be calculated would help me to evaluate reporting rule.	10/20/2015 3:44 PM
492	does not detail how the funding will support the success of the gifted student.	10/20/2015 2:59 PM
493	you could have districts who currently have coordinators just let the ESC's do the coordinator work which results in a far less quality service to the district and the students.	10/20/2015 2:41 PM
494	It states that districts have to report their funds going to gifted education; however, how money is to be spent is still very vague. What are those "guidelines prescribes by the department of education?"	10/20/2015 2:39 PM
495	Clarification on allowable expenses for gifted expenditures would be helpful.	10/20/2015 2:20 PM
496	Additional funding would be extremely beneficial.	10/20/2015 2:07 PM
497	Having a gifted coordinator/supervisor does NOT guarantee gifted services. This is an easy way to show that you have services, but the students are NOT being served.	10/20/2015 2:06 PM
498	The funding language in the proposed rule does not specifically indicate that funds allocated for gifted education be spent on gifted education services within the district. At a minimum, there should be some accountability in the funding language that indicates that gifted funds be spent on identification, coordination, and gifted intervention specialist services. Missing altogether from the proposed rule is any reference to gifted staff qualifications for districts (only for ESCs). By eliminating all professional standards for teaching gifted students in a district, the state is allowing districts to determine who is qualified to teach this special population of students at a time when state licensing for this area of education already exists. Not only does this devalue the professional knowledge offered by licensed GISs, it also removes the recognition of gifted students as a special population in need of specialized services.	10/20/2015 2:01 PM
499	Currently many districts do not use their gifted funding for gifted education. Please revert ALL gifted funding back to unit funding that flows through the ESCs. When gifted money flowed through the ESC it was spent on gifted.	10/20/2015 2:00 PM
500	ODE needs to provide appropriate funding for gifted services to all districts.	10/20/2015 1:53 PM
501	There is no need for a gifted coordinator to have a gifted license. Many supervisors are great supervisors of areas in which they do not have a license. This stipulations should be removed.	10/20/2015 1:41 PM
502	There should be state and federally mandated funds for this student population, just as there are for students at the other end of the spectrum.	10/20/2015 1:22 PM
503	Money designated for gifted services must only be used for gifted services.	10/20/2015 1:13 PM
504	Gifted Coordinator- Why must they be have a gifted license? Most coordinators are central office personnel that are usually doing more than one job. I don't see why an admin license isn't sufficient!	10/20/2015 12:47 PM
505	Re: 1) what expenses are included? Staff salary, benefits, portion of the building expenses to house a gifted classroom for certain periods of the day? where would they find the "guidelines prescribed by the department of education"?	10/20/2015 12:45 PM
506	It needs to be made much more specific and detailed but I do not have suggestions at this time.	10/20/2015 12:42 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

507	To me it seems by requiring districts to publish funds spent on gifted services is a means of harassment or bullying them. It would be "embarrassing" to districts that do not allocate money for gifted to put so in print. However, the state does not provide them with sufficient funding to do so. My district does have a unit of gifted assigned by the ODE but it only covers a fraction of my salary, benefits and supplies needed. Without the district allocating money for my position, there would not be one. I can only imagine what will happen when our district can not pass a levy. Would the lack of funding be published on the website as well?	10/20/2015 12:41 PM
508	Wrong question. They are clear but not feasible. Having a coordinator that has a gifted license and admin license is too difficult to find.	10/20/2015 12:32 PM
509	Is this funding equitably shared with all districts in each ESC consortium?	10/20/2015 12:29 PM
510	More, more, more. That's what I see when I read this proposed rule. It will require MORE testing, MORE time away from instruction, and MORE expectation from the MORE students who will be identified as gifted. However, where is MORE money to support cost of additional testing? Where is the MORE money to be able to compensate teachers for an extended school day since we are loosing more time to testing? Where is MORE money to hire additional gifted teachers and provide additional gifted services? Where are MORE gifted teachers? Do policy makers not know there is a shortage of gifted teachers, especially in rural settings? Having to hire gifted teacher for this year, there were only two candidates; both from North Carolina. They, then backed out because of our location. We recruited one of our ELA teachers with an interest to work under a Supplemental License. Policy makers keep bowing to gifted advocates and fail to realize the majority of the schools in this state do not have the resources to support the change initiative.	10/20/2015 12:24 PM
511	I like the transparency of how money is spent...	10/20/2015 12:20 PM
512	This puts districts vulnerable to have to post information and open to possible law suits.	10/20/2015 12:19 PM
513	Funds should be set aside specifically for gifted funding and not lumped into the general fund.	10/20/2015 12:13 PM
514	When is this proposal going to take effect?	10/20/2015 11:57 AM
515	Change the portion regarding gifted coordinators required to maintain administrative credential "if supervising staff" to simply be gifted coordinators "are required to possess and maintain an administrative credential." People with coordinator titles frequently are empowered to make policy which impacts buildings. They must have building level administrative experience to better understand their decisions are not implemented in a vacuum.	10/20/2015 11:56 AM
516	By allowing the districts to decide who can take care of gifted supervision and gifted teaching, how many districts will seek gifted unit funding? Gifted funding needs to be line itemed and not in the general funds. This will improve accountability.	10/20/2015 11:52 AM
517	There is not sufficient funding.	10/20/2015 11:37 AM
518	Will additional funding be allocated to school to pay for additional staff, materials, etc.?	10/20/2015 11:26 AM
519	STOP putting gifted dollars in the general fund! My district uses them to fund the whole district and they do not directly go to teaching gifted students. This is a misuse of funds and honestly a shame. Special education doesn't have the option to use their dollars in the general fund, why gifted?	10/20/2015 11:22 AM
520	While it can be very beneficial to bring decision-making to the most local level possible, it can be detrimental in some situations as well. By taking this concept to the extreme, state-wide consistency is lost. It is important to be specific and intentional when writing a formal document. The proposed rule here is very brief and specifies very few actual standards.	10/20/2015 11:20 AM
521	Self reporting is not sufficient. Our district reports that we have 2.5 gifted coordinators when we only have .5. What is the protocol for reporting this to the state? There is not a protocol. Reported monies should be specifically allocated to gifted services and not go into the general fund.	10/20/2015 11:20 AM
522	Sending unit funding to ESC's doesn't allow districts to use district personnel without losing unit funding. Send it directly to the districts.	10/20/2015 11:19 AM
523	No	10/20/2015 11:06 AM
524	What funds support gifted ?	10/20/2015 11:02 AM
525	ESCs have a place in gifted education, but districts should provide coordination and services, someone must be in place, in each district to advocate for the wide spectrum of gifted students and their needs. Without the district personnel, gifted advocacy is limited to only serving the typical gifted students. A true awareness of the broad spectrum of gifted students, especially beyond the typical is the only way to ensure that this population of students is identified and served. Ensure teachers are aware of the students and their needs is crucial to fulfillment of their educational potential. I would almost advocate for ensuring that a qualified gifted coordinator is a district employee, and the specialist be a part of the ESC. Advocacy at the district level would be better fulfilled with this model.	10/20/2015 10:59 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

526	While we appreciate the funds for "gifted coordinators" resources need to go directly to the district to serve students as opposed to pushing them through the ESCs. Also, the ODE should consider providing some incentives to help create opportunities for teachers to get a GT license. We all know that there is a significant shortage. Perhaps it may be worthwhile to have this sort of thing be like a "nursing delegated authority." The coordinator could coordinate the program and work on curriculum compacting with teachers that aren't certified as opposed to requiring certification. Where is the research that says a person holding a GT license is a better provider of GT services compared to one that doesn't have the license? Eliminate the rules and the red tape.	10/20/2015 10:58 AM
527	services should be provided by GIS or highly qualified with help from GIS.	10/20/2015 10:57 AM
528	Currently, there are no parameters that gifted funding needs to be spent on gifted instruction. Only ESC gifted funding is accounted for. We would suggest that all gifted funding funnels through the ESCs to districts - ESCs will ensure that the money gets spent on gifted education.	10/20/2015 10:56 AM
529	Publishing gifted expenditures to the public is a double-edge sword. Few members of my community understand what "gifted" means: they think these are the kids who invent stuff in their basement, or wear glasses and have poor social skills, or are entitled, rich white kids. The general public will generally misinterpret the need and therefore advocate against any expenses for these children. Because districts aren't required to offer district services, this puts it on the front lines of being cut. Care is needed here.	10/20/2015 10:48 AM
530	Districts should report funds if the state is willing to adequately fund the programs. Appears to be another way to measure and report accountability that may be misleading to the average tax payer.	10/20/2015 10:39 AM
531	Where is the real funding for gifted education? There needs to be proper funding to serve gifted students.	10/20/2015 10:39 AM
532	The more I learn about ESCs, the more I think they're a big scam. Our district undertook an evaluation of its gifted programs which was led by a consultant from the local ESC. Their biggest recommendation was -- surprise -- to hire more gifted ed consultants from the ESC. And the lady was a dingbat who everyone found to be quite off-putting.	10/20/2015 10:36 AM
533	My concern is why does it only state that gifted coordinators tied to an ESC must have these qualifications? Why aren't there qualifications for in district coordinators and intervention specialists?	10/20/2015 10:33 AM
534	There should be more funding accountability by districts for funds provided to support gifted education. Gifted staff qualifications for districts receiving gifted funds should not be limited to just ESCs. This should apply to all districts.	10/20/2015 10:26 AM
535	Gifted funding should be directly linked to a district's gifted services including staff.	10/20/2015 10:19 AM
536	I am currently in a district where I know the amount listed as coming in for gifted but do not see the expenditures. This needs to be highly accountable.	10/20/2015 10:18 AM
537	Keep current language	10/20/2015 10:16 AM
538	Gifted coordinators that have an administrative and a GIS license may not be the best person for the job. Extra rules that tie the hands of individual districts are frustrating. Each district should be able to determine the best coordination options for their students.	10/20/2015 10:11 AM
539	It seems as though districts will not be required to give specifics on how they are using their gifted funds. This will lead to the funds not being used for the intended students in providing appropriate services and resources for a sound and effective gifted program.	10/20/2015 10:08 AM
540	Staff qualifications for district personnel should mirror those used for ESC's.	10/20/2015 10:04 AM
541	like the transparency of how money is spent...why aren't there qualifications for school districts in regards to gifted coordinators and gifted intervention specialist.???.	10/20/2015 9:42 AM
542	All gifted funding should be spent on Licensed and Certified Gifted teachers/coordinators. The proposed plan says that ESC's must use funds for this, but what about the rest of the educational world? Licensed Gifted Intervention Specialist are a must to ensure quality gifted services. Teaching gifted students requires additional training just like teaching special education children on the other end of the spectrum. Rules and guidelines must be put into place to ensure that districts maintain a high quality of gifted personnel.	10/20/2015 9:34 AM
543	No.	10/20/2015 9:32 AM
544	N/A	10/20/2015 9:29 AM
545	How about a system to ensure that gifted coordinators are tracking what services gifted students actually receive? The problem is kids are identified and there are no programs, clustering, services provided to them. A coordinator should coordinate services to make sure identified students are being adequately served!	10/20/2015 9:24 AM
546	This language is really weak in terms of school districts who don't use an ESC. There is no definition of what districts should spend on gifted education.	10/20/2015 9:24 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

547	It would seem to me that there is a dismantling of ESC's. The proposed standards require that gifted coordinators at ESC's have the gifted endorsement but districts can use "district determined criteria." It just does not make sense. Funding issues: we still have a lot of districts spending gifted monies on things not related to gifted. The provision that allows ODE to remove funds of non-compliance from current standards needs to be reinstated. There is no "bonus" for districts spending more on gifted than required. Shouldn't districts get a bump on the report card for additional spending?	10/20/2015 9:21 AM
548	Thinking this might be an issue for districts who are poorer and can't afford a gifted specialist or coordinator. How will it be possible for them to provide services?	10/20/2015 9:21 AM
549	There needs to be more local control.	10/20/2015 9:12 AM
550	Where is the funding accountability? This does not specify any sort of amount needing to be used or really how it is to be used.	10/20/2015 9:08 AM
551	Districts shall report to the department the amount of funds spent on gifted education using guidelines prescribed by the department of education. - What does this mean? What counts as gifted education if we do not have gifted units? Do we count one-eighth of a teacher's salary who teaches the one class of Algebra 1 for high school credit to eighth graders? Or does this only apply to districts who do receive state dollars for gifted units? Do we include the state dollars spent for gifted identification?	10/20/2015 9:02 AM
552	It is very difficult if close to impossible for all districts to hire someone with a gifted license. There are those that are qualified with content expertise and expperienc with identified students.	10/20/2015 9:01 AM
553	What % of gifted funding will be reimbursed to local districts? This should be noted in this proposal.	10/20/2015 8:57 AM
554	Why don't districts have the same requirements that the ESC's have? If they have gifted funding, why isn't it clearly spelled out that their personnel have to be appropriately certified?	10/20/2015 8:54 AM
555	This needs to be done so desperately.	10/20/2015 8:52 AM
556	no	10/20/2015 8:52 AM
557	Not to the rule related to funding per se. Ohio simply does not fund Gifted services at a defensible level. Expanding the number of funded units for coordination and intervention specialists by increasing the appropriation line item for these services through Educational Service Centers would provide Ohio with the most efficient way to deliver gifted education support and expansion. This shared services approach would also norm the provision of quality gifted services and help to create a true statewide community of practice around gifted education. By not significantly increasing the number of gifted units through ESCs by increasing the appropriation line item is a lost opportunity - and contributes to making this entire effort around improved rules - all but meaningless. Fund the services better.	10/20/2015 8:51 AM
558	none	10/20/2015 8:50 AM
559	Why specify how an ESC must employ certified and licensed, but have that same requirement absent for a school district not using an ESC. This makes little to no sense. So if a school district doesn't contract with the county for services- are they not required to have certified people in those positions? I see a glaring problem with this.	10/20/2015 8:49 AM
560	There are no stipulations tied to gifted money that districts receive. Why are the gifted funds sent to districts not specifically earmarked for gifted services and instruction? Why is gifted funding sent into the general fund of school districts, where superintendents and treasurers can play around with the money. Due to the proposed new operating standards, since no services are specified this means that the districts can used gifted money for other things, especially since it is included in the general fund.	10/20/2015 8:49 AM
561	There needs to be language reflecting a requirement to show each area of reporting, not just the lump sum.	10/20/2015 8:42 AM
562	There are no real funds it's all a 3 card monty shuffle of funds. The staff qualifications are murky at best. Any administrator should be able to be a coordinator.	10/20/2015 8:42 AM
563	This is not clear: Districts shall report to the department the amount of funds spent on gifted education using guidelines prescribed by the department of education. The department, no later than October 30 each year, shall publish on its website district expenditures for gifted education. What are those guidelines? Do we include the portion of the teachers salaries that teacher HS classes in 8th gr? Do we include the dollars we receive from the state to spend on identification of gifted students?	10/20/2015 8:39 AM
564	What additional funds are districts going to receive to implement the proposed operating standards?	10/20/2015 8:39 AM
565	A good teacher, teaches. They don't need to have a GIS licensure to appropriately. The idea of that is ludicrous and a burden.	10/20/2015 8:33 AM
566	It seems off that money flowing into ESCs must be spent on personnel with gifted licensure but districts can provide services with staff that does not have it. How is that consistent?	10/20/2015 8:30 AM
567	An evaluation process for the gifted intervention specialist: how are they evaluated?	10/20/2015 8:29 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

568	Fund the program at an appropriate level.	10/20/2015 8:29 AM
569	This is pretty muddy for small, local districts. For example, at the high school often gifted service is provided through advanced courses, which are not exclusively for gifted students. How would districts report money spent? Why are we reporting expenditures? Will we receive a proportionate increase in funding?	10/20/2015 8:27 AM
570	Do not require other programs to be cut to fund this one. If this is important, provide the funding needed!	10/20/2015 8:21 AM
571	You haven't even funded regular education at the necessary levels and now you want to think you are funding gifted. Don't hurt yourself patting yourself on the back. Pathetic!!!	10/20/2015 8:20 AM
572	If you are proposing that a teacher has met district criteria to work with gifted students, then funding allocations should apply to them as well.	10/20/2015 8:18 AM
573	No	10/20/2015 8:11 AM
574	What about the funding for school that do not use the ESC for their gifted services? What outline is there that dictates how that money will be spent?	10/20/2015 8:10 AM
575	Funds/ expenditures need to be required for gifted coordinators, for GIS's, for testing, etc.	10/20/2015 8:07 AM
576	NA	10/20/2015 8:04 AM
577	If I gave these types of guidelines to the staff in my company, I would be flying blind. We'd either do great, or we'd fail. And, I'd have no way to know which way we were headed. Really bad policy.	10/20/2015 8:02 AM
578	Let us take care of things ourselves without all these mandates constantly	10/20/2015 8:02 AM
579	Funding for gifted education and finding qualified gifted educators is an issue.	10/20/2015 7:59 AM
580	No.	10/20/2015 7:56 AM
581	What about teachers with gifted endorsements?	10/20/2015 7:54 AM
582	"Gifted intervention specialists must have gifted licensure." This seems to contradict the earlier statement that someone determined by the district can serve gifted. The website showing what each district spends on gifted should also show how much funding is provided by the the state for these gifted services. It seems only fair to show the lack of state commitment.	10/20/2015 7:53 AM
583	Inadequate funding	10/20/2015 7:48 AM
584	Yet more unfunded mandates that stretch our already thin resources into areas other than educational opportunities. What is going to be done with the data collected? How will that information be used once it is collected? Are we once again collecting data for the sake of collecting data?	10/20/2015 7:43 AM
585	What is gained by a gifted intervention specialist with an administrator's license when supervising staff? The administrator's license seems an extensive requirement for the sole purpose of supervision. In addition, since the principal license is for certain grade bands - would it count to have a principal's license for grades 4-9 and supervising staff serving students in all grades? It would be more appropriate to simply require professional development in supervision and employee evaluation.	10/20/2015 7:42 AM
586	The State of Ohio doesn't fully fund education now, so why would I believe it fund anything extra it continues to mandate.	10/20/2015 7:32 AM
587	The proposed rules have districts report what they spend on "gifted education" but it does not have them report how this compares to their budget allocation that is specifically there to support gifted services. In short, if the legislature sees it fit to provide a specific budget line item, reporting should be against that specific line item. Otherwise the reporting is meaningless. If personnel that provide and coordinate gifted services at an ESC have to have gifted endorsements, why don't providers in districts and schools have to do the same? The ESC personnel cannot possibly be the provider of record for the many schools that they serve, therefore you still have students being served by non-credentialed providers.	10/20/2015 7:29 AM
588	The \$32,000 we receive does not provide enough funding to support just one gifted specialist.	10/20/2015 7:22 AM
589	No	10/20/2015 7:18 AM
590	Is there guidance on funding? Are there maximum or minimum allowances? Will teachers have to get re-certified or is it a lifetime certification? Will they also have to demonstrate ability to perform this specialized job to maintain their position?	10/20/2015 6:53 AM
591	Interesting that ESC's have a standard for functioning GIS role but not districts... Very inconsistent.	10/20/2015 6:36 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

592	Finding enough teachers that are certified in gifted education will be very difficult for community schools. I wonder if there is a grandfathered process that can be put into place for schools to catch up with such endorsements that teachers may not already have.	10/20/2015 6:26 AM
593	Please allow adequate time for educators/schools to acquire the necessary licensure prior to setting this in stone. Piloting this in several districts of varying sizes and economic levels would be nice information to see prior to setting these criteria.	10/20/2015 6:11 AM
594	This creates a whole new expensive and unnecessary industry - at the high school level, those certified as gifted educators know nothing about the requirements of AP Physics or AP Literature or dual credit college courses, but they are a new level of administration to further overburden those highly specialized and underpaid teachers and chase them from education into other work.	10/20/2015 4:47 AM
595	The gifted staff qualifications for ESCs are very clear, but the gifted staff qualifications for all other entities are extremely UNCLEAR. The duality is unacceptable. Who qualifies as a gifted staff should be universally the same across ALL educational entities that fall under the ODE. Period. You have an obligation to ensure, as best as you can, that ALL students are receiving gifted services of the same caliber. Most of what is in the previous gifted standards needs to be PUT BACK IN PLACE. At a time when curriculum requirements are becoming more and more rigorous, to make the current standards for gifted education less rigorous is a slap in the face to gifted students. The pervasive attitude that "they'll be fine, they're gifted students, they'll be successful" is inaccurate and infuriating. Gifted students fall through the cracks as easily as any other student, and rigorous standards and requirements help prevent this from happening. The last thing we need to produce are really well read high school or college drop outs, or more students who are not living up their potential due to the fact they were not challenged in school.	10/19/2015 11:10 PM
596	We have a number of excellent teachers that may have been denied the opportunity to gain gifted training. We should provide opportunities for more of our teachers to receive training. What exactly is covered under funds teacher salary, books, etc?	10/19/2015 10:13 PM
597	What is required for the qualifications? Can a superintendent, school board, or principal state that anyone they choose is qualified? Who decides the licensure?	10/19/2015 9:55 PM
598	Why so much emphasis on ESC funding and units. Why require coordinators to have supervision? Those with a masters degree could coordinate programs.	10/19/2015 9:47 PM
599	What is the rationale for specifying that gifted intervention specialists have gifted endorsement when districts have the ability to establish their own criteria for providing services?	10/19/2015 9:43 PM
600	3) Where educational service centers AND schools districts who receive gifted funding...	10/19/2015 9:42 PM
601	We need services provided by people certified in gifted education. Gifted teachers need to have caseload restrictions and the amount of direct service should be specified. We need a clear definition of who is qualified to serve gifted children. We need a process for collecting data to ensure that gifted services are effective.	10/19/2015 9:29 PM
602	Administrators supervising should NOT have to have a Gifted License. Administrators do not need PE, ART , Music etc. to evaluate teachers, they should not need it to evaluate gifted teachers.	10/19/2015 9:19 PM
603	I agree that the funding should support a gifted intervention specialist and that the GIS must have gifted certification. This is a balance to the previous set of standards that were so vague in terms of who teachers the gifted students. If there is a GIS who has a strong background in gifted education that will help. It would still be better if the teachers of gifted students were certified in the area.	10/19/2015 9:18 PM
604	No I don't have any specific changes for the proposed rules related to funding	10/19/2015 9:18 PM
605	Application needs to be confirmed, do not limit to certification only.	10/19/2015 9:15 PM
606	It's going to be difficult for many districts to find a gifted Intervention Specialist who has gifted licensure. What happens to a district that cannot find a teacher with those qualifications? The same is true of gifted coordinators. It's VERY difficult to find these people!	10/19/2015 9:13 PM
607	Funding is poorly addressed in this rule. It should reflect the number of students identified in a district rather than the number of "units" allocated to a district, similar to the way in which students with disability funding is allocated. Educational service center funding should not flow from the state, but rather through the districts if they choose to use those services!!!	10/19/2015 9:12 PM
608	Adequate funding from the state is needed.	10/19/2015 9:05 PM
609	Are there clear provisions in place that specify that funding for gifted must be spent on gifted children and their education? With the way this is written, it seems that districts could make the decision to take funding from the state and use it in ways that they claim supports gifted education . . . but it may not be the clear, direct support of gifted education that is needed.	10/19/2015 9:00 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

610	There should be funding if there are mandates. Administrators should not need to be certified in gifted is they already have an administrator license.	10/19/2015 8:59 PM
611	Will all districts receive funding or only those with unit funds? Yes, the specialists have always had appropriate licenses.	10/19/2015 8:53 PM
612	It will be great if it works. So far most of the school gifted specialists I have met do not know about the highly/profoundly gifted.	10/19/2015 8:49 PM
613	Where is the funding for public schools?! Small schools with small budgets will discontinue gifted education without money for identification, services or staff. The proposed standard is to screen in two grade bands but without funding for identification, schools will never be able to achieve this goal.	10/19/2015 8:32 PM
614	I wonder how many of our gifted teachers are gifted certified? I question the need for them to be based on how our current programming works... As in it works very well.	10/19/2015 8:26 PM
615	It will be a blurred line to report on funding used for providing an advanced or accelerated course, including International Baccalaureate programming because those courses are NOT solely taken by students identified as gifted. We encourage ALL students to take rigorous courses, and gifted identification is not a requirement to take such rigorous courses. Point being districts will not be able to accurately report funding serving gifted students in such cases. A district would have to determine what % of the student population is identified as gifted and prorate the cost of teacher in each accelerated course. Bottom line it won't be clear and each district would calculate differently based on the proposed rules.	10/19/2015 8:13 PM
616	Adding funding accountability language that reflects the legislative intent of HB 59 while respecting the Governor's veto of 2013: There needs to be some sort of consequence or accountability for districts who do not spend their funds on gifted education. Last year, more than half of Ohio's districts spent less on gifted ed than they received from the state. And yet, there is no consequence for that. Why? I currently work in a district that spends far beyond state provided dollars for gifted education. However, this has not always been the case. In my work history, I have encountered districts who spent that money on filing cabinets, general education teachers who may have one child in their classroom identified as gifted, or who simply refused to account for the money at all despite not offering gifted services of any sort in the district. One district cut gifted services, cut their relationship with the local ESC to provide gifted coordination, and provided no professional development related to gifted to any staff members. A portion of their state funds earmarked for gifted education was spent on identification testing, but a large percentage was rolled into other district expenditures. This is not fair to the students for whom the funds were intended. Without any sort of funding language, there is no accountability to the taxpayers and parents.	10/19/2015 8:13 PM
617	Allocate more funds for servicing our gifted learners. These funds should include academic supports and emotional supports.	10/19/2015 8:08 PM
618	I think funding reports should be required to be more specific.....exactly what funding was used for	10/19/2015 8:07 PM
619	district should be obligated to report how funds are utilized (specific expenditures)	10/19/2015 8:03 PM
620	not sure I like the wording of unit funding. reminds me of old wording under special education funding. people start thinking places.	10/19/2015 7:57 PM
621	Why is it only the ESCs that must have qualified gifted teachers and coordinators, but public schools and charters do not? If schools receive gifted funding they don't have to spend it on gifted education, merely report what they are spending.	10/19/2015 7:51 PM
622	Is licensure any different than the usual procedures?	10/19/2015 7:36 PM
623	More accountability does not improve student learning.	10/19/2015 7:31 PM
624	I do not feel that there is enough detail in the regulations for gifted funding. The rule needs to be much more specific about funds and how they are distributed. I believe that the qualifications for staff for educational service centers are clear, but I feel that the same clarity and specificity needs to exist when describing the services provided by educators in public schools as well.	10/19/2015 7:22 PM
625	Sometimes it may be difficult to find candidates for supervisory positions who have g/t licensure and administrative licensure. An individual should not be hired for this position merely because they are the only candidate or two with dual licensure.	10/19/2015 7:22 PM
626	In the event a district has no gifted licensed individual(s) to serve in role as Gifted Coordinator the Superintendent can designate a Gifted Coordinator who holds an administrative licensure as long as district professional development is provided by a gifted licensed trainer.	10/19/2015 7:05 PM
627	Schools need to be specifically accountable to how funds are used for gifted students. The guidelines need to be spelled out here or districts will just continue what they do now....claim they are using the funds correctly when actually little of that money is going to gifted students.	10/19/2015 7:04 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

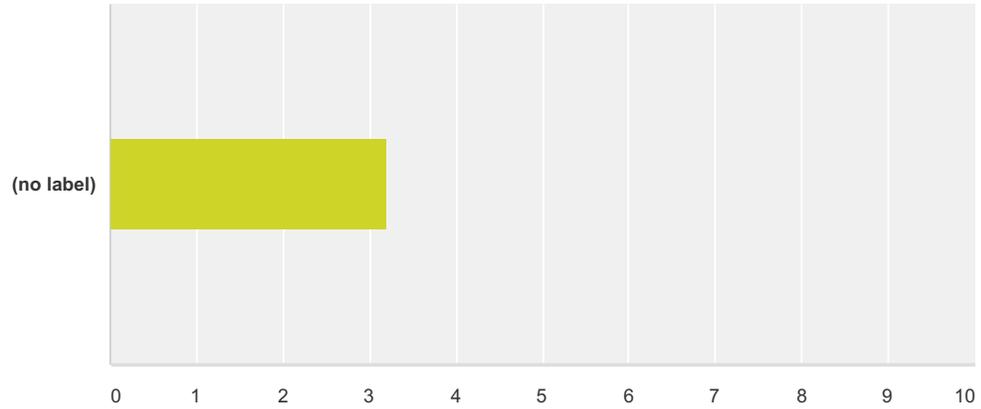
628	No	10/19/2015 6:54 PM
629	Gifted certification doesn't guarantee quality instruction. Districts should have the flexibility to assign the best teacher for the job.	10/19/2015 6:53 PM
630	What rules will be in place to ensure that "gifted" kids are served equitably in all schools? For example, the gifted school in our district appears to be getting more money than the gifted classrooms in regular old schools. How is that equitable?	10/19/2015 6:36 PM
631	Big problem! Who is paying for it.	10/19/2015 6:36 PM
632	propose no changes	10/19/2015 6:31 PM
633	No real listing of what the services are that money is dedicated to. Why are ESCs required to have gifted licensed personnel but not districts? All gifted coordinators should be required to have a gifted license.	10/19/2015 6:26 PM
634	Districts should have to specifically report how their gifted funding is being used to promote transparency to parents and the community.	10/19/2015 6:21 PM
635	Educational Service Centers must be clearly defined.	10/19/2015 6:14 PM
636	Remove the need for Gifted Coordinators to hold gifted licensure...	10/19/2015 6:11 PM
637	Eliminate the necessity for coordinators to have gifted licensure if they already possess an administrative license	10/19/2015 5:59 PM
638	Yes, make certain where ESC's have combined with other county ESC's that the funding doesn't cut off the means to receive gifted education from a qualified gifted educator. In other words, the combining of county ESC's should not have meant job loss to a gifted educator and to the services he or she provides...	10/19/2015 5:58 PM
639	It would be helpful if there were funding or grant opportunities that would allow districts a chance to expand and support resources that would benefit all exceptional children. This would be more in line with Universal Design for Learning that is a meaningful initiative for schools in the Ohio Improvement Process (OIP) and a part of the State Personnel Development Grant (SPDG). Schools like ours do not have gifted intervention specialists and could use support in training teachers in WEPs as well as giving them guidance of how these might fit into the OIP framework of TBTs.	10/19/2015 5:46 PM
640	This does not provide enough funding to be able to fairly educate students with gifted	10/19/2015 5:46 PM
641	There's a slight of hand no matter how well written it is.	10/19/2015 5:41 PM
642	Any chance you could write in where these funds will come from? Will the state help?	10/19/2015 5:37 PM
643	Districts need to have more accountability on how the funds are being spent.	10/19/2015 5:36 PM
644	Charter Schools sound adhere to the same obligation to report funds annually.	10/19/2015 5:30 PM
645	When the legislature is pressured by lobbying groups to increase services, they should also come up with the funding for those increased services... currently they simply expect the local schools to pressure their local community to fund the mandates....	10/19/2015 5:26 PM
646	While funding is a critical element, it would seem that focusing on qualifications and services provided would address this topic in a more measurable way.	10/19/2015 5:24 PM
647	Why are you limiting funds to only gifted coordinators/ interventions specialists if you are allowing others to run the gifted programs. You need to put your money where your policies are. All you have done is cut off funding to schools that cannot afford specialists. Is this really the stance you want to take? When did money become more important than our children's education?	10/19/2015 5:22 PM
648	Districts funds for gifted education should only be spent on gifted education. Currently, it is not mandated and can be spent on anything. Educational Service Centers are not funded or staffed at the level(s) required to serve districts. District funding is often not enough to hire a resource, so it needs to be shared among districts.	10/19/2015 5:16 PM
649	Having gifted licensure doesn't mean a teacher can best meet the needs of a gifted child. I have worked with plenty of educators who can get a ton out of kids and meet their needs better than someone that has a piece of paper that says "gifted intervention specialist on it." Just let the best person serve kids, please.	10/19/2015 5:15 PM
650	I would want to know what other areas are mandated to report their spending on the district website. With very little funds actually being allocated on gifted and mandated testing, most district reports will say the same thing-testing. Is that really the message we want parents to see? MORE TESTING? When families are opting out of state testing I feel that this is a step backward and I can see parents refusing to allow their students to take our tests for gifted.	10/19/2015 5:13 PM
651	More funding is needed.	10/19/2015 5:12 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

652	Transparency on the part of everyone except ODE. How about publishing some transparent info about those Turkish charter schools and who's cooking the books on the charter school data? You people should be ashamed of yourself.	10/19/2015 5:09 PM
653	No	10/19/2015 5:05 PM

Q13 Requirements for submission of annual plans and reports set clear expectations for identification and services for gifted students in the proposed rule.

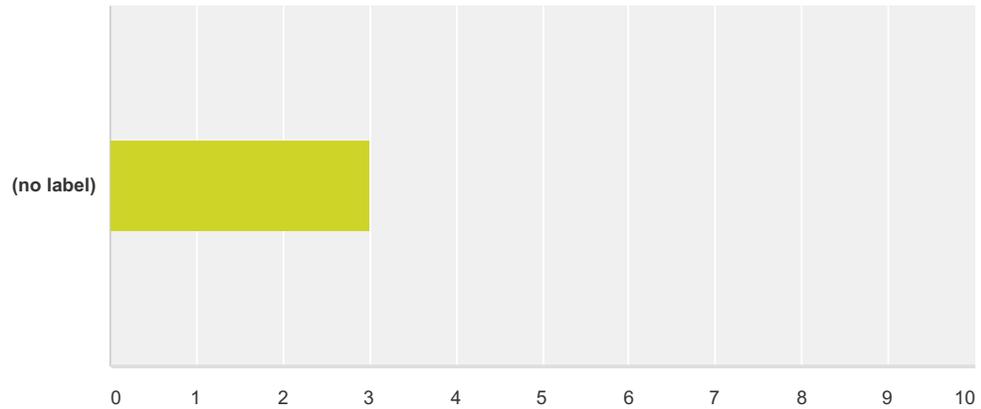
Answered: 1,830 Skipped: 1,632



	Strongly Disagree	Disagree	Neither Agree or Disagree	Agree	Strongly Agree	Total	Weighted Average
(no label)	17.27% 316	10.44% 191	15.19% 278	49.40% 904	7.70% 141	1,830	3.20

Q14 Components of the gifted indicator and the use of the indicator in the annual district report card are essential to evaluation of gifted education services as outlined in the proposed rule.

Answered: 1,833 Skipped: 1,629



	Strongly Disagree	Disagree	Neither Agree or Disagree	Agree	Strongly Agree	Total	Weighted Average
(no label)	20.24% 371	14.35% 263	19.04% 349	38.03% 697	8.35% 153	1,833	3.00

Feedback Survey on Proposed Operating Standards for Gifted Education

Q15 Do you have specific changes for the proposed rule related to accountability?

Answered: 622 Skipped: 2,840

#	Responses	Date
1	There is no current mandate for gifted services and funding continues to be cut. The gifted indicator seems like an unfair way to measure how districts are meeting the needs of the gifted population when they are not even required to serve the students. Mandate services and provide adequate funding to do so then the use of the gifted indicator can become a sufficient tool to measure how well districts are doing by their gifted students.	11/7/2015 5:19 PM
2	Gives too much latitude to districts about what the services will be.	11/7/2015 4:56 PM
3	As I noted earlier, I feel that I have insufficient information to respond here, as there is no comparison with current policy.	11/7/2015 4:52 PM
4	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/7/2015 4:49 PM
5	Want to observe recommendations of the OAGC.	11/7/2015 4:12 PM
6	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	11/7/2015 3:53 PM
7	There will be no true evaluation of gifted services in the proposed rule. The proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. Under the proposed rule disempowers neither the State Board or ODE will be able to meet their responsibilities to provide leadership on gifted education issues and forfeits oversight of state fiscal resources.	11/7/2015 3:38 PM
8	ODE audits should be maintained. Districts that fail to produce an acceptable plan for identification and service should get more than "technical assistance" from ODE. They should get their gifted funding withheld until they produce an acceptable plan. District service plans must follow ORC, so the operating standards should echo those requirements. Likewise, districts not providing effective services for gifted students should have ODE come in and fix their programs so that the gifted funds provided them are used effectively for the betterment of gifted learners. Accountability has to include measures of the effectiveness of the various service models, all of which should be outlined clearly by maintaining the language from the current operating standards that clearly specifies different service options. Of course, with the service models we also must maintain the qualifications of licensed staff to maintain the fidelity of the inputs we are measuring.	11/7/2015 2:51 PM
9	These requirements are not spelled out, they are left to state government to determine quietly every year. It does not have a minimum requirement spelled out so that all Ohio students receive a minimum standard of services. This is worded with very general information. I would like to have minimum services spelled out more completely.	11/7/2015 1:46 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

10	- ODE should have the authority to audit and remove funds of non-compliance from current standards as stipulated in the ORC. - Specific inputs to determine effect of services should be data driven. - The results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state. Please do not limit the gifted performance indicator to the current elements. - Reinstate service and staffing requirements that are in the currently in the operating standards as stated in the service section. - Language from the ORC should allow ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. - Reinstate the district service plan as required by the ORC.	11/7/2015 12:56 PM
11	There can be no true accountability if the amount of time allotted for gifted services is not delineated.	11/7/2015 12:09 PM
12	Reinstate provisions that require ODE audits and allow ODE to remove funds for non-compliance, from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in the current operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	11/7/2015 12:05 PM
13	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/7/2015 12:01 PM
14	There needs to be accountability for the amount of instructional time the gifted student receives.	11/7/2015 11:56 AM
15	Evaluation is too narrow -- go back to original plan.	11/7/2015 10:44 AM
16	Using grade-level state assessments to try to measure the value-added growth of anything to a student who is already above grade-level is pointless. A student who scores at the top of the assessment each year in practice is showing NO growth - because the state assessments aren't meant to measure things outside the grade. This also means schools would be penalized for grade-advancing students who are gifted - because they may go from being at the top of the test markers to the middle of the test.	11/7/2015 10:24 AM
17	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/7/2015 9:53 AM
18	There is no mandate for gifted services, yet districts are to be measured for students served - how is this permitted?	11/7/2015 9:42 AM
19	It's difficult to have any accountability when the rule omits definition of service, audits and accurate reporting regarding the use of funding provided specifically for gifted services, no mention of properly trained staff and total lack of enforcement of existing identification rules. Recommend: 1) Utilize the existing rule as a starting point and then add performance measures that include every grade level and category of gifted students recognized under the law.	11/7/2015 9:23 AM
20	You need provisions that require ODE audits. You need to have data collection which will show effect of services. You need to keep the current service and staffing requirements, and then look to revise, if needed. The Ohio Revised Code required a district service plan. Please include it in your new proposed rule.	11/7/2015 8:56 AM
21	Expectations are not enough to ensure that gifted students get the kind of academic instruction they require. Further, the students and teachers bear the burden of the evaluation of gifted services through the state testing when the real burden and accountability rests with the district.	11/7/2015 8:39 AM

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22	Districts who are not properly serving gifted students are not held accountable with these new standards therefore provisions need to be added to remove funding for districts not using funds to properly serve gifted students. Audits need to occur to hold districts accountable. Also the gifted indicator which caused many districts to actually look at what they were doing for gifted students and think about adding services is not able to properly measure as in these standards output points are extremely limited. In the new rule neither ODE or the board can really hold districts accountable or provide leadership to assist districts in working with gifted students. Districts must be held accountable for what they do for these students similar to how they are held accountable for other populations.	11/7/2015 12:45 AM
23	How are districts accountable without audits? Reinstate ODE audits. Those districts found to be in non-compliance will have funds revoked by ODE. Where are the service and staffing requirements? Reinstate current service and staffing standards, then incorporate waivers on the basis of performance on multiple measures (including but not limited to the gifted performance indicator). Also, where is the language allowing the ODE to re-mediate and reconstitute gifted services in districts that are chronically failing gifted students? Reinstate this language. That will make districts accountable. ORC should be followed. Reinstate provisions to be in compliance with ORC.	11/6/2015 11:36 PM
24	The proposed rule does not state that the districts have to meet any standards; the districts just have to give information about a plan to potentially meet standards.	11/6/2015 10:11 PM
25	If you must have a VAM, then make sure you are tying this to the gifted educator, too. Gifted students miss 20 percent of their education in the general classroom in our district, yet 100 percent of the VAM is tied to the general educator. Not exactly what you'd call fair!	11/6/2015 9:54 PM
26	Keep the current standards. The proposed new standards lack accountability or meaningful guidelines and oversight for school districts. They can easily be ignored and no longer contain the "meat" to them. How can you assess "value-added growth measures for students" when you aren't providing a list of standard testing options for how students are assessed for identification and services provided? If you aren't standardizing the identification measurement, how can you determine if services are effective and producing growth in gifted students? This survey has been created in such a way that it makes it difficult for less informed participants to answer the questions to best represent their views. Though the proposed standards have been included in each section of the survey, it is not obvious how much of the current standards are being removed in the proposed new standards. Many of the questions completely ignore the fact that most of the detailed oversight and regulations have been removed from the standards, and are worded in a way to generate a positive response.	11/6/2015 8:51 PM
27	I do like the Accountability portion of the new standards!!! These as well as OTES has helps provide better ownership of Gifted students by all staff members in the school. However, I do have a problem with one portion of the Gifted Indicator. Value-added for gifted students as it is currently is statistically invalid. I have talked to Office of Accountability and I understand Value-Added also I'm the District Test Coord and a District Value Added Train-the Trainer. SO, I do know what I'm talking about with this measure. As, it DOES NOT provide for the stretch above grade level standards to show the TRUE MEASURE of GROWTH. I was told by ODE that yes we know that, but it is EQUALLY UNFAIR TO ALL GIFTED IN OHIO, SO ALL SCHOOLS ARE EQUALLY AFFECTED. Really!!!! This does not help gifted kids, only sets them up for failure and underachievement if they cannot reach a goal. It ceilings out for a student and they cannot show growth, only maintain growth, which is difficult to do when one year say 3rd Grade reading the scaled score conversion to 99% percentile and the following year the 4th grade Reading by missing one questions the Scaled score conversion to the 98% percentile, show that the student had a negative -1% growth. That what value-added does, and if that student does not stay always to the 99% for any test after that year (95%, 96%, 97%, OR 98%) it appears the student did not have growth or maintain, HOWEVER if they Test really had rigor and stretch BEYOND the current grade level standards, then and only then could a student show growth beyond what they know to show you that YES the did grow academically and be able to show you what they do know. BUT NOT AS VALUE ADDED MEASURES ARE CURRENTLY. ALSO on the inputs for Race/Minority- we cannot get points if we live in an area that has little to NO cultural diversity. In Southeastern OHIO if we do not have 10 students of minority status Identified gifted and served we cannot get those points, however, we do not have 10 minority students even in a school to identify in the first place. I understand you want them ID in areas where they do have large numbers, but it hurts districts where we don't have that population and we cannot ID kids who are not in our schools. Reduce the number or change it to help areas with low minority students enrolled.	11/6/2015 8:06 PM
28	If gifted students are testing at high achievement levels, the "value added" component of the report card does not indicate the efficacy of a gifted program. Most gifted test takers are hitting the "ceiling" of a test, with no room to improve on that specific test. Also, if a gifted student is testing above grade level, what is the intention of measuring the value added score? Students may be making progress by gaining one year of growth, but value added does not reflect that growth, only how much "progress" cannot be made on a specific test that the student already performed highly on. DO AWAY WITH VALUE-ADDED or FIGURE OUT HOW TO ACTUALLY MEASURE VALUE.	11/6/2015 7:52 PM

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29	The requirements for submitting annual plans and reports is clear, insofar as the expectations set. What is concerning to me, as a parent, is the more detailed and prescriptive language that was omitted (or stripped) in this version of the rule. Gifted education is an area that requires more detailed standards and requirements, not more flexibility and local discretion. Experience tells us that when accountability and responsibility is shifted to the local districts, disadvantaged districts (and the students they serve) suffer the most, as they have fewer resources. As such, this new approach unfairly impacts districts that already suffer from flagging resources, by stripping out standards that promote accountability.	11/6/2015 6:04 PM
30	I don't know that my district would continue its programming if there was no accountability for low test scores. This survey is very misleading and convoluted.	11/6/2015 5:41 PM
31	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	11/6/2015 5:23 PM
32	This rule is not specific enough to protect the high achievers and too ensure they reach their full potential.	11/6/2015 5:15 PM
33	again, no idea what exists currently and what would change	11/6/2015 5:15 PM
34	As the proposed rule renders much of the gifted indicator useless, there will be no true evaluation of gifted services in the proposed rule. The following changes must therefore be made: 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/6/2015 5:10 PM
35	ODE should have the ability to withdraw funding for districts that don't meet the needs of gifted students. Standards need to be stated clearly, so districts know what needs to be done to serve gifted students.	11/6/2015 4:51 PM
36	The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources.	11/6/2015 4:50 PM
37	the component of the indicator are not outlined	11/6/2015 4:35 PM
38	Reinstate the required ODE audits and allow ODE to remove funds from non-compliant schools. Reinstate service and staffing requirements from the current operating standards. Make provisions to remediate and reconstruct gifted services in districts that are chronically failing gifted students.	11/6/2015 4:32 PM
39	Again, sounds great...but how will accountability be monitored?	11/6/2015 4:22 PM
40	It should stay the same as it was before.	11/6/2015 4:21 PM

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41	I do not understand how any governing board could, in good conscience, simply eliminate the possibility of oversight (audit) and would allow themselves to remove funds of non-compliance from current standards (as laid out in the current Ohio Revised Code). This would leave the Department of Education out of compliance as there would be no duty to perform audits for gifted units. No words left for the ODE or the State Board of Education to meet any responsibilities to provide leadership on gifted ed issues and stewardship of state financial resources. In fact, I still don't understand what is wrong with the current Code? This proposal is not only poorly written and thought out, but deliberately obliterates any gifted programming support or standards. The Ohio Revised Code needs to left alone! I don't understand why any time or money was spent (limited though it seems to be in both respects) on putting forth a new proposal. Specialized higher education is required for teachers who provide specialized, quality services (based upon quality parameters defined in the Ohio Revised Code as it stands) in order to provide an education which meets the needs of a special needs population -- the gifted child.	11/6/2015 4:20 PM
42	The proposals here do not match up with the other proposals. How do you report on something that you allowed to be eliminated if a district deems fit to?	11/6/2015 4:14 PM
43	The requirements outlined are clear but not sufficient to evaluate success of the program. More data points should be incorporated into the reporting and evaluation of the parameters and results of the gifted program.	11/6/2015 3:31 PM
44	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/6/2015 3:20 PM
45	The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. As the proposed rule renders much of the gifted indicator useless, there will be no true evaluation of gifted services in the proposed rule. Recommendations: 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/6/2015 2:57 PM
46	Under the proposed rule, the gifted indicator will have little, if any, relevance. Reinstate staffing and service minimums to make the gifted indicator more meaningful.	11/6/2015 2:56 PM
47	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/6/2015 2:40 PM
48	So let me get this right. You are going to hold districts accountable for servicing gifted students yet you pull funding away and all definitions of service criteria. That doesn't even make sense. If it going to be an indicator it should have a full funding behind it with more strict guidelines for reporting. Some districts are ethical on their reporting and others are not. There should be a check in occasionally from the state, more than just what are you claiming you do but what is actually happening now.	11/6/2015 2:32 PM
49	No	11/6/2015 2:29 PM

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50	reinstate the following - provisions for ODE audits and removal of funds non-compliant with current standards - service and staffing requirements that are in current operating standards - district service plan as required by ORC	11/6/2015 2:26 PM
51	As the proposed rule renders much of the gifted indicator useless, there will be no true evaluation of gifted services in the proposed rule. My concerns: The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule dis-empowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. I recommend the following: 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/6/2015 2:07 PM
52	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/6/2015 1:31 PM
53	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	11/6/2015 1:24 PM
54	1) There is no required "accountability" found in this rule. Previously, ODE conducted district audits and could eliminate funding for non-compliance. These need to be re-instated. Funding earmarked for gifted education is being used inappropriately in many districts because ODE has been so lax in this area. This rule does not address this blatant misuse of state funds. 2) This rule does not address the need for reporting necessary to provide a transparent look at gifted identification and services as required for the gifted indicator. 3) Evaluation of districts on the gifted indicator cannot happen with this current draft of the rule. Without clarification about services provided by and guided by licensed professional gifted educators, and specification about how services can be provided (as mentioned in response to a previous question), there will be no objective data with which to measure district gifted services. 4) The components and gifted input requirements on the gifted indicator need to be reviewed. They are not providing a true representation of gifted education and services in the state. Service and identification requirements are impossible for rural and small districts to meet. Districts that have been diligently identifying gifted students in the past are now being penalized because they cannot adequately provide service percentage requirements. Districts that did not previously attempt to identify gifted students, K-12, now earn higher service percentage scores because they have "targeted" students for identification to match their services, instead of beginning with student needs to determine services to offer. Also, some districts cannot meet the minority requirements on input points because their district does not have a large enough minority population. Because there are no audits or disincentives for "gaming the system", districts are documenting instruction as gifted service when in fact, it is not. Ohio is again leaving their brightest gifted students further and further behind....	11/6/2015 1:14 PM
55	I like the submission of policy and plans. I do not like the shell game that districts are playing to meet the gifted indicator. It is one thing to collect data on the numbers of gifted and the numbers of those served as well as how they are performing. But to evaluate and assign a grade to districts based on what they are doing for gifted has create a push to attain INPUT TOTALS and not a push to do what is right.	11/6/2015 1:12 PM
56	The gifted indicator is gone in the proposal, so how can you evaluate gifted services?	11/6/2015 12:49 PM

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57	<p>1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.</p>	11/6/2015 12:47 PM
58	<p>The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.</p>	11/6/2015 12:17 PM
59	<p>Too often the parents are infatuated with the title of giftedness for their child rather than what services are provided.</p>	11/6/2015 12:16 PM
60	<p>None of this matters unless you put teachers in classrooms. AND you provide classrooms. AND the addition of these classrooms does not impact other teachers and students. In many districts, administrators add a gifted room and take away something else. That does not help.</p>	11/6/2015 11:58 AM
61	<p>1.Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2.Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3.Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4.Reinstate the district service plan as required by ORC.</p>	11/6/2015 11:47 AM
62	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	11/6/2015 11:44 AM
63	<p>Again parents should have a say and should be able to provide feedback about if the education a child received was unto the mark</p>	11/6/2015 11:42 AM
64	<p>There is a huge flaw in this plan. If a child has been grade elevated to keep them challenged you would expect that the next round of state testing reflect a small dip in scores. 99% to 80's. This is to be expected as the child has skipped a full year and is now being compared against older individuals. By the current method the schools report card would be negatively impacted by this dip in score. Even though this is the clearly the best choice for the student. I fear this may cause some schools to discourage grade elevations to keep scores high at the expense of our brightest students.</p>	11/6/2015 11:32 AM
65	<p>This will be a lot of time consuming paperwork to be prepared by classroom teachers if a separate Gifted Intervention Specialist or other gifted staff are not available.</p>	11/6/2015 11:28 AM

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66	<p>The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources, so:</p> <ol style="list-style-type: none"> 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC. 	11/6/2015 11:28 AM
67	<p>Under the proposed Rule, how could a district be accountable for identification and service when there are no clear guidelines? The Board Policy Statement specifies that, "Policy makers and stakeholders will have clear knowledge of our progress towards effective and appropriate services for all students who are gifted." The proposed Rule dismantles all language for appropriate service, settings, and personnel. Consequently, there would be no way to judge the comparative effectiveness of a service setting, instruction, or personnel therefore leaving the gifted indicator entirely a work of fiction and a potential illusion of excellence. Ohio policy makers need to understand that gifted students need to have appropriate educational experiences that enable them to compete with other gifted individuals on a national and global platform. .</p>	11/6/2015 11:27 AM
68	<p>There is no accountability to offer services; simply to identify the students and share the plan (which if I am reading correctly, can simply be to do nothing)</p>	11/6/2015 11:21 AM
69	<p>I'm glad to see that July 15 was referenced, but it makes me wonder when parents will receive testing grades. The fact that we receive testing results so far after our kids take the tests and the fact that the tests are taken so early in the year makes them worthless to me as a parent.</p>	11/6/2015 11:05 AM
70	<p>As described, the indicator includes the value-added growth measure for students. Under current testing, value-added growth is poorly measured for gifted students, as they often exceed the standards for their grade level and might meet those for higher grades, but they are tested at their nominal grade level. If, in her first round of fifth-grade testing, a student has already mastered the fifth-grade content, she will show no growth in her second round of testing.</p>	11/6/2015 10:54 AM
71	<ol style="list-style-type: none"> 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC. 	11/6/2015 10:44 AM
72	<p>Language needs to be added to ensure districts who do not provide accurate self reports will be audited/funding revoked</p>	11/6/2015 10:44 AM
73	<p>It's almost impossible to reach the gifted indicator with one person doing gifted for the whole district, and then that person is teaching more than half of the day, also.</p>	11/6/2015 10:35 AM
74	<p>Are identification and service plans expected to go to ALL parents in the district, prior to the beginning of the school year? This seemed unclear in the guidelines.</p>	11/6/2015 10:31 AM
75	<p>(E)(6) the number of children served should be included in this report</p>	11/6/2015 10:28 AM
76	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	11/6/2015 10:28 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

77	Gifted staffing levels should be defined and required in the proposed rule (ORC). Operating Standards should reflect and include components of the Ohio Revised Code.	11/6/2015 10:23 AM
78	1.Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2.Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3.Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4.Reinstate the district service plan as required by ORC.	11/6/2015 10:14 AM
79	Do not penalize schools that are ALL gifted ALL the time. They are value added ALL the time so shouldn't be penalized.	11/6/2015 10:05 AM
80	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	11/6/2015 9:59 AM
81	You lost me when you said testing to show growth. Our district tested our gifted kids for growth. In the beginning of the year, my child maxed the test and missed one question. She wasn't the only one. So, how do you show a year of growth or even ANY growth, if you are using a standardized test for normal children on gifted children? What do you do with a child who maxes out the test THE FIRST TIME THEY TAKE IT? A year later, even if she is ill that day, unless she gets EVERY SINGLE QUESTION RIGHT AGAIN there is no growth at all and because only one question is "better" there is negligible growth and the teacher is penalized. We also spent a day each month taking the STAR reading test whether you were gifted or not. My gifted children got 100% every single time they took it, including the first day. Along with most of their classmates. And yet, they had to waste a day every single month taking that same exact test. GET A TEST THAT ACTUALLY IS DESIGNED FOR GIFTED KIDS. OR, better yet, DO NOT WASTE TIME TESTING CONSTANTLY. You max out the test with a perfect score? Gee, let's not take it again.	11/6/2015 9:45 AM
82	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements.	11/6/2015 9:25 AM
83	This is maybe the most important part of the rule. How can the rule go from 15 pages down to 2 pages?	11/6/2015 9:07 AM
84	Yes, I do have specific changes for the proposed rule related to accountability.	11/6/2015 8:51 AM
85	The proposed rule renders much of the gifted indicator useless, there will be no true evaluation of gifted services in the proposed rule. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	11/6/2015 8:39 AM
86	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/6/2015 8:30 AM
87	The current provision concerning the report card emphasizes the accounting of services, but does nothing to monitor the quality of services.	11/6/2015 8:21 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

88	There is o clarity at all regarding accountability in the new rules. Minimum levels of service and output are not specified and are left to be be determined on an ad hoc didtrict by district basis; which would also serve to waste tie and resources yearly as districts expend effort to adjust their service levels and goals for what ever reason. Rules should define one single set of minimum standards for service and output and so eleminate wasted effort in trying to devise new standards every year. In this regard, the current rules are more than sufficient.	11/6/2015 8:16 AM
89	If districts are given very little and do not have strong guidelines to follow in educating their gifted students, then why bother holding them to this level by being judged on an annual report card. It seems ridiculous. You're asking districts to provide services (if you want to) and then giving them little to any funds to do so. You are also giving them very loose guidelines to follow and most will take advantage of this to save money. They will have nothing but classroom teachers offering services and few to any trained gifted teachers. It is a travesty to not care about our brightest students.	11/6/2015 7:49 AM
90	Do better	11/6/2015 6:46 AM
91	We need consistency from schools to schools and district to district. Why do we continue to allow the schools to decide the plan and submit it. Students in the same school district but attending different schools are not getting the same services provided in the same way. Students in neighboring schools are not taught or provided the same classroom and material settings even though they have the same guidelines. We need a standard plan that is a guideline that is required by the schools. Instead of providing technical assistance provide student assistance.	11/6/2015 6:28 AM
92	You aren't even asking the correct questions. This is why I'm looking into private schools.	11/6/2015 12:57 AM
93	The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/6/2015 12:15 AM
94	The ODE should not eliminate provisions that are already in place to protect gifted services.	11/5/2015 11:48 PM
95	Currently many districts appear to be "gaming the system" for the report card and, perhaps, other purposes. The rules need to work to prevent this, as this maneuvering replaces effective work and real learning with shallow programming, low-value WEPs, etc.	11/5/2015 10:59 PM
96	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	11/5/2015 10:30 PM
97	Very weak language. Much room left open for broad interpretation.	11/5/2015 10:29 PM
98	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	11/5/2015 10:22 PM

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99	<p>As the proposed rule renders much of the gifted indicator useless, there will be no true evaluation of gifted services in the proposed rule. The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	11/5/2015 10:14 PM
100	<p>The gifted indicator loses meaning when the definition of services is not standardized. Using the gifted indicator to compare districts would become impossible when the criteria are inconsistent.</p>	11/5/2015 10:08 PM
101	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	11/5/2015 9:31 PM
102	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	11/5/2015 9:24 PM
103	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC.</p>	11/5/2015 9:13 PM
104	<p>Doesn't say how they will be held accountable. Just says the hell report and evaluate.</p>	11/5/2015 9:09 PM
105	<p>Without a definition of service, the indicator data will not be valid. Specific definitions of service are needed - including service by a GIS and a Gifted Coordinator. ODE audits are needed with the ability for ODE to provide interventions for poorly performing districts. Technological innovations should also be considered so that "copies" of various documents can be digital rather than on paper.</p>	11/5/2015 9:07 PM
106	<p>I wonder if parents will ever see these plans. These should be posted on every districts websites and then the district should be audited. My own district has never informed me of its acceleration policy. I had to call the state to get a copy of it. Someone should audit the districts.</p>	11/5/2015 8:47 PM
107	<p>Accountability is good (does this mean the department will actually check up on districts? What are the consequences for non-compliance with the flimsy expectations?). The indicator is helpful, but not everything. In the absence of definitions of service, districts will find much easier ways to get points without doing any single intentionally good thing for gifted students. Report card measures can be helpful in tracking academic progress of students-- but it does not account for all of the other components of giftedness that are typically addressed in appropriate service settings by gifted specialists.</p>	11/5/2015 5:40 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

108	Leave the funding, staff, and opportunities available for the gifted students. Spend the time, manpower, and funds this movement has cost everyone on more pressing matters: how about figuring out what test is best for all Ohio students to take? Note, test was not plural. Too much of our students time is WASTED on preparing for tests that do not count towards anything. All of the mandatory testing is not a true reflection of what our children know, are learning, nor does it reflect what the children need to know in order to become successful adults. Let the teachers teach the material the students need and go back to one big test a year. More tests do not equal better students!	11/5/2015 4:50 PM
109	Finally!	11/5/2015 4:42 PM
110	The proposed rule eliminates the means with which ODE can ensure that districts are following the gifted rules and laws. The rule virtually eliminates any group at the state level to provide leadership on gifted education. I think it is important that ODE be given the right to audit schools to make sure that they are following gifted rules and laws.	11/5/2015 4:10 PM
111	Gifted compliance is taking a great deal of time and funds. Some local control is needed.	11/5/2015 4:08 PM
112	I believe it is important to provide assistance to districts not meeting the standards, but there should be regular audits by the Ohio Department of Education so that there funding can be removed if they continue with non-compliance. There also needs to be service and staffing parameters set forth. There needs to be the ability to revamp the programs that are chronically failing their gifted students.	11/5/2015 3:51 PM
113	It would have been nice to know these sections were separated before the survey was initiated...	11/5/2015 3:47 PM
114	No	11/5/2015 3:41 PM
115	The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-compliant districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output of gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates more of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education and stewardship of state fiscal resources. Recommendations 1.) Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2.) Incorporate data collection on specific inputs to determine effect of services. In addition, the results of gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3.) Reinstate service and staffing requirements that are in the current operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4.) Reinstate the district service plan as required by ORC.	11/5/2015 2:53 PM
116	There is little to no real accountability in the new standards.	11/5/2015 2:49 PM
117	How is the value-added growth measure meaningful for someone (like my daughter) who is already achieving at the 99th percentile in math? If she and others like her show no or minimal growth because they are already beyond where they need to be, the indicator ceases to be useful. Furthermore, if each district is determining its own level of service and its own qualifications as far as who can teach gifted students, then an indicator will not be useful when trying to compare across districts. Instead of proposing that each district make up its own plan, it would be better to have rigorous standards across the state that each district must meet. Then the so-called "indicators" might mean something because they would reflect how well or how poorly each district was meeting the standards.	11/5/2015 2:44 PM
118	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	11/5/2015 2:37 PM
119	more accountability provisions are needed to assure children in all districts, even underfunded ones, receives the services that support them.	11/5/2015 1:45 PM
120	We should reinstate service and staffing requirements and the district service plan as required by ORC. Reinstate required ODE audits and allow ODE to remove funds of non-compliance from current standards. Results of the gifted performance indicator should be incorporated into an annual report outlining gifted education in the state without limiting the gifted performance indicator to the current elements.	11/5/2015 1:39 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

121	<p>accountability needs to be ongoing and not guided primarily by test performance. The quality and individual plans , how they are modified and audited is of primary importance and when done in a way that supports gifted kids similarly to how children with disabilities are supported in districts. Children with abilities are not accessing the curriculum to encourage growth and development just as children with a disability are not accessing the curriculum to encourage growth and development.</p>	11/5/2015 12:53 PM
122	<p>The ODE is destroying the gifted education process. The proposed rule renders much of the gifted indicator USELESS. There will be NO TRUE evaluation of gifted services in the proposed rule. Reinstate provisions that require ODE audits and allow the ODE to remove funds for those non-compliant from current standards.Services and staffing requirements should be reinstated which are in the current operating standards.The district service plan should also be restated as required by the ORC.</p>	11/5/2015 12:34 PM
123	<p>Restore language in the current rule parts (F) and (G) that requires ODE audits of school district gifted programs; allows the ODE to remove state funding for gifted education from school districts that do not comply with the standards; and allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. The proposed draft rule sends the wrong message to school districts by remaining silent on audits and compliance with standards. School districts are required by law to identify students who are gifted, and comply with the gifted rules, which have the force of law. The "removed" language requiring ODE audits aligned completely with the intent of the law, and reinforced identifying gifted students as a district priority. The removed language, which allowed the ODE to remove funding and reconstitute gifted services in school districts not complying with standards, protected students from failing gifted education programs. The rule should also support efforts to improve gifted services and increase student achievement by requiring school districts to report data on certain input measures to assess their effect on gifted outcomes. The Ohio Alliance for Arts Education also supports the publication of an annual report about the status of gifted education, with specific information about the number of students identified and served in the visual and performing arts in Ohio's schools.</p>	11/5/2015 12:10 PM
124	<p>The accountability requirements are much weaker than existing requirements.</p>	11/5/2015 10:49 AM
125	<p>These accountability rules are much less rigorous than the currently implemented accountability standards.</p>	11/5/2015 10:48 AM
126	<p>These rules for accountability seem to require almost no accountability other than reporting. The previous guidelines gave the requirement for a periodic audit. That is now gone and the reporting requirements are merely statistics. This does not provide any kind of review of the real effectiveness of the program.</p>	11/5/2015 7:50 AM
127	<p>CHANGE- If you are expecting a value-added score for gifted kids, then they must work with a licensed gifted teacher in order to push them to show growth. This is the most difficult group to grow, and they will need extra services (gifted programming focusing on the state standards) in order to meet that value added.</p>	11/5/2015 7:37 AM
128	<p>The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	11/5/2015 7:04 AM
129	<p>Blah blah more paperwork and bureaucracy instead of substance.</p>	11/5/2015 6:10 AM
130	<p>Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. Incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students.</p>	11/4/2015 10:29 PM

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131	1) Reinstate the district service plan as required by ORC. 2) Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 3) Reinstate service and staffing requirement that are in the current operating standards (in service section). 4) Incorporate data collection on specific inputs.	11/4/2015 10:17 PM
132	E (5) Something about separating out the "gifted" students performance and reporting it separately on the district report card doesn't sit well. On standardized tests students should not even be identified as gifted. E (6) Will the department then report these numbers along with the funding the district spent as required in D (1)?	11/4/2015 10:12 PM
133	In accordance with the OAGC recommendations, the Department of Ed. should: Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	11/4/2015 9:40 PM
134	This question suggests that ODE is providing oversight and reviewing service plans...which is not happening. ORC allows ODE to remove Funds from districts that are not in compliance. Further, ODE is not conducting audits as required by ORC. The proposed rule does nothing to fix that. This proposed rule does not hold districts accountable. The notion that districts could determine who is qualified to deliver gifted services removes that authority from teacher licensure and is wholly inappropriate. The proposed language makes the indicator meaningless, and appears to be an attempt to make appropriate educational opportunities for gifted children in Ohio disappear. This proposed Rule is a giant step back, demonstrates a complete failure to understand what school life is like for gifted children who are not supported, and is detrimental to the education of Ohio's brightest students.	11/4/2015 9:36 PM
135	Gifted services should be a requirement, not an option. Special education for those 3 deviations below the mean is not optional. How can the state justify not requiring special education for those 3 deviations above the mean? Additionally, as noted before, a teacher must have gifted certification to teach gifted children. Traditional teaching degrees are not focused on the needs of the gifted student and do not provide the additional knowledge required to teach gifted students. Again, it is common knowledge that students 3 deviations below the mean require a specialist. Why is it so difficult to understand that students 3 degrees above the mean also require a specialist? They are different. They learn differently. They learn faster, deeper, broader, they make connections that the average person is not going to make. They need someone who is trained to meet their specific needs.	11/4/2015 9:05 PM
136	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	11/4/2015 9:02 PM
137	In accordance with the Ohio Association for Gifted Children recommendations, I think the Department of Ed. should: Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	11/4/2015 8:19 PM

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138	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/4/2015 7:45 PM
139	#6 should include number of gifted SERVED.	11/4/2015 5:38 PM
140	Red Tape.	11/4/2015 5:26 PM
141	The proposed document does not clearly define the requirement to submit policies and plans and the importance of doing so. The service to gifted students seems so "watered down" in this document that the indicator won't really be measuring how students progress and grow when they receive service by qualified gifted endorsed educators. Districts will still be able to manipulate their data to gain maximum input points even though they may not truly be serving the students.	11/4/2015 4:42 PM
142	More specific guidelines for the submission of annual plans and evaluation are needed. These are minimal requirements which can pass a low qualified gifted service.	11/4/2015 4:32 PM
143	Allow ODE audits and removal of funds for non-compliance.	11/4/2015 3:28 PM
144	The educator who serves the gifted population should be licensed as such.	11/4/2015 3:25 PM
145	This will be a joke. Districts will assign gifted duties to principals, etc. who will not know how/what to report and the gifted services/reporting will wind up in shambles. I have already witnessed this in districts where it has been done.	11/4/2015 3:17 PM
146	As per OAGC recommendations and based on my prior experience as a coordinator of gifted programs..... 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/4/2015 2:46 PM
147	The accountability requirements do not match up with the proposal for servicing gifted students. Without minimum requirements in place it is unfair to require schools to meet the requirements for the district report cards.	11/4/2015 2:03 PM
148	Parents need to be included in the decision of gifted plan, not just told what school will offer.	11/4/2015 1:41 PM
149	State should have requirement of the minimum services the gifted students should have. The freedom this new rule will make the districts having the ability to provide nothing.	11/4/2015 1:28 PM
150	The indicator needs to be sufficiently detailed to provide specific information about the quality and efficacy of gifted education services. The indicator as outlined provides rather generic information which may not be useful for program evaluation	11/4/2015 1:25 PM
151	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	11/4/2015 1:24 PM
152	This section talks about accountability by developing a plan for gifted service but it is too vague. There should be some mention that the plan must encompass the students entire K-12 experience. For example, simply allowing an 8th grader to take algebra I is not a gifted program in math that helps kids in K-7th grade.	11/4/2015 1:22 PM
153	All this seems to talk about is reporting statistics and descriptions. Where are the descriptions of what gifted children and their parents ought to reasonably expect in terms of services? Where are the descriptions of what actions will be taken, or are available to families, if a district or school fails to meet the minimum services that are required?	11/4/2015 12:57 PM

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154	Districts need support in order to be rated highly on the gifted indicator. Gifted students need highly qualified teachers to meet their needs.	11/4/2015 12:26 PM
155	Let the children participate in evaluating the services rendered. They are the customer.	11/4/2015 12:01 PM
156	How is the quality or effectiveness of gifted services being evaluated? There are no concrete and measurable goals for this in the current verbiage.	11/4/2015 11:56 AM
157	None	11/4/2015 11:44 AM
158	What continues to be missing over the years and with this new proposal is the students are "technically" assessed by Ohio BOE standards, yet, the individual districts set their own rating which is typically higher than state standards. This non-inclusiveness skews the reporting structure, the district report card, etc. The bottom line is that districts don't "fully" serve their gifted students - only a small percentage of those deemed "gifted".	11/4/2015 11:40 AM
159	There is accountability, its just like this change every parent who has a child receiving gifted services should have been contacted directly by The Ohio Department of Education. it is our tax dollars that fund schools and it proposed changes like this that make us very unhappy.	11/4/2015 11:36 AM
160	Need more details in the proposal.	11/4/2015 11:35 AM
161	Each gifted student is unique. How can standardized testing give a good indication of the level of quality the student is receiving? Some students will be academically above the current grade level. What grade level test would they take? My 9 year old is testing at 11th grade in math, he could coast until he graduates high school and still pass the tests.	11/4/2015 11:28 AM
162	I support the draft offered by the Ohio Association for Gifted Children. This legislation guts incentive for districts to offer quality programming for gifted children by qualified instructors. Asking whether these guidelines are clear is not asking whether these rules are good ones. This survey, this request for feedback is as shoddy as the new rules.	11/4/2015 11:28 AM
163	Accountability in pubic education - really?	11/4/2015 11:09 AM
164	It seems that the rule applies mainly to identification of gifted students, but does not clearly spell out what services the students would receive. Based on my interpretation, the district would only have to identify gifted students but would not be required to provide additional services.	11/4/2015 10:57 AM
165	With the cuts the gifted indicator is meaningless. Please adopt OAGC recommendations	11/4/2015 10:10 AM
166	What happens to gifted programs that fail their students? Is funding pulled? How are the programs restarted, restructured? How do we know when the programs are failing or succeeding? Weren't these standards and procedures explained in previous rules? Why has that language been removed? While flexibility is appreciated, these new rules seem vague to the point of lawless. Some standards and procedures must exist to run a program effectively.	11/4/2015 9:55 AM
167	Yes, the schools should provide a written plan for what they will do with the gifted program, but the program itself shouldn't be based on how many kids can be accepted into it or how well they do on testing..... don't force the gifted class to teach to the tests, let these kids be creative and learn the way they know how. There has to be a better way to determine whether the gifted curriculum is helping these children.	11/4/2015 9:41 AM
168	Recommendation: 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/4/2015 9:41 AM
169	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/4/2015 9:21 AM
170	There is so little detail in this proposed rule that it is unclear exactly what is being required.	11/4/2015 9:00 AM

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171	Removing gifted audits and the potential for removing funding for non-compliant districts removes most of the tools that the DOE has used in the past to hold districts accountable for their failure to properly support gifted students. While "local control" is not, in and of itself, a bad thing, like many of the actions of Ohio's DOE lately, local control without oversight is.	11/4/2015 8:41 AM
172	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/4/2015 8:36 AM
173	1.Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2.Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3.Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronicallyfailing gifted students. 4.Reinstate the district service plan as required by ORC.	11/4/2015 8:20 AM
174	No where does it explain what the expectations of services are for a school. If a gifted coordinator or specialist do not have to be an instructor assigned to a gifted child as stated 2 items back, then why should they get an indicator suggesting that they have a gifted program when they do not have qualified individuals to assess a students abilities, educate them and meet there emotional needs.	11/4/2015 8:12 AM
175	Audits need to be included in the plan	11/4/2015 7:40 AM
176	It is too general. Districts that do not have the licensed staff to develop the plans and reports will certainly not be serving their gifted and talented students. The requirements stated allow for minimal thought and support of students.	11/4/2015 6:05 AM
177	There is no real accountability here. Sure, district's have to submit their plans, but what if they don't and how will anyone know if they are being followed? As mentioned earlier in the survey, I've seen my grandson's district outright ignore a gifted qualifying score because he wasn't in the grade level they were reviewing (even though the state law says the scores apply for K-12). I've seen the same district outright refuse to do testing for my grandchildren even though ODE said they should provide two opportunities a year for testing. When my daughter complained to the superintendent, she was told he would consult with someone about it, but nothing changed. A building administrator told my daughter the law didn't apply to them. Even though this information was shared with ODE, there were no investigations or consequences for the district. There are no appropriate audits going on with the existing language. Why would you cut the language further and reduce any chance parents have to have districts out of compliance reviewed> And this was going on with my daughter complaining to ODE. What about children whose parents don't know they can complain or how to complain? Who is looking out for those children? This gifted indicator sounds good in theory. But, with all the changes in the state test, I imagine it won't be useful at all for a few years. Plus, I read the article in the Washington Post about the low cut scores set in Ohio for last year's test. If the bar is set that low for regular education students, why would I trust an indicator using cut scores set by the same department and board to tell me that GIFTED students are achieving on the test the way they should. Plus, one part of the indicator is about the level of identification and service. If there are no audits to verify the information about this is reported correctly and there are no rules about what is a service in the first place, then how is that part helpful? I could not, as a parent and grandparent, look at that indicator right now and feel confident I am getting the truth about my district. There should be room for the indicator to be revised as other state measures are revised.	11/4/2015 5:12 AM
178	Again, just let the teachers teach. "those who teach, do. Those who cannot, pass laws about teaching."	11/3/2015 10:26 PM
179	It should have clear countermeasures for failing districts and how they should be restructured or improved. We shouldn't necessarily cancel funding for failing programs, but we need to evaluate effectiveness to ensure gifted students in all districts have opportunity even if their programs are failing.	11/3/2015 9:48 PM
180	OK, this begins to answer my comments from the previous question.	11/3/2015 9:44 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

181	<p>As the proposed rule renders much of the gifted indicator useless, there will be no true evaluation of gifted services in the proposed rule. The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.</p>	11/3/2015 8:55 PM
182	<p>Most of the gifted indicator is useless with the proposed rule. I recommend that we reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. We should also incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. We need to definitely reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Finally, reinstate the district service plan as required by ORC.</p>	11/3/2015 8:16 PM
183	<p>I strongly disagree with the accountability piece being the report card indicator</p>	11/3/2015 7:44 PM
184	<p>The component on the gifted indicator that weighs inputs should be eliminated. Attaching points to percentages of identified is not about quality gifted services. Urban and rural districts may struggle. The components to maintain are the performance index and value added. Those are based on data and fair for all districts.</p>	11/3/2015 7:40 PM
185	<p>I am strongly opposed to the point system used for the gifted indicator. I think looking at the value added components and performance index points are more representative of our district's impact on gifted students than the point system. The points earned for services are more reflective of how many hoops a district is willing to jump through to complete WEPs in order to turn middle and high school advanced coursework into "gifted" services. Also, I find it extremely unfair to reward districts that have high percentages of students identified. In a normal population, only 5% of the population would be considered "gifted". But additional gifted points are awarded to districts that score well beyond that % (the highest number of points being awarded to districts with 15%, or more, of their students identified). You can't make students gifted- they either are or they are not. I feel like my "average" district is being penalized for being "average". Also, my district, like many districts in my area, is 98% white - we are never going to earn points for identifying or serving minority students. I truly feel that the point system, as it stands now, is stacked against my district.</p>	11/3/2015 7:21 PM
186	<p>The gifted performance indicator section that gives points for identification and services should be removed. Urban districts may have difficulty identifying large numbers of students and rural districts may struggle looking for numbers for the point system. Once again, it encourages additional testing and costs to districts. It should be the quality of the services, not earning points on numbers identified. I agree using value added and the performance index as the 2 sections to be used on the performance indicator.</p>	11/3/2015 7:20 PM
187	<p>The proposed rule eliminates ODE gifted audits. How will ODE be able to remove funding from those districts that are not compliant? This proposed rule eliminates most tools that ODE used to ensure that districts were compliant or lost funding. Please reinstate these provisions and incorporate data collection to determine if the gifted services are effective. Reinstating the district service plans would be a great asset in determining compliance.</p>	11/3/2015 7:01 PM
188	<p>You aren't showing us how the rule is changing. Specifically, what in the old language is being removed and what new language is being added. Parents need to be able to see exactly how the rule is changing if they are to adequately assess whether or not they think the changes are helpful. Because of this fault with the survey, I have to mark strongly disagree.</p>	11/3/2015 6:54 PM

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189	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	11/3/2015 5:37 PM
190	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	11/3/2015 3:24 PM
191	<p>1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.</p>	11/3/2015 3:23 PM
192	<p>They appear to be minimal - once a year reporting. How will it really be determined if they are "doing enough"? This seems more like "reporting" but is there follow-up and will there be repercussions for not doing some sort of minimum program?</p>	11/3/2015 2:39 PM
193	<p>EMIS reporting will be ineffective if the specific language of what constitutes service is removed. Request for the following in the Proposed Standards: *Include specific language noting service and staffing requirements in the current operating standards. *Include language that ODE will correct and/or have authority to remove funding from districts found to be out-of-compliance.</p>	11/3/2015 1:18 PM
194	<p>I agree to a certain extent. If you have a school that isn't at a higher learning level it is hard to compare to another school that has more advanced students. A lower learning level of students may not be quite as intelligent as a higher learning level yet the teacher is held to the same standards. That would either lower the higher learning level standards or raise the lower learning level standards either way it is unbeneficial to each group.</p>	11/3/2015 1:12 PM
195	<p>The use of the gifted indicator has pushed this legislation allowing districts more flexibility in order to meet the indicator. More flexibility waters down the services provided.</p>	11/3/2015 1:02 PM
196	<p>The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. OAGC recommends the following: 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.</p>	11/3/2015 12:44 PM
197	<p>Strongly support growth trends need to be analyzed once child is identified.</p>	11/3/2015 12:22 PM

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198	Once again the lack of specifics is not inspiring. Why are we afraid to hold the schools accountable? It seems that our brightest students will be punished by these lack luster standards.	11/3/2015 12:19 PM
199	Why eliminate ODE audits? Gifted funding should only go to districts that provide actual quality gifted educational services. Oversight is needed for accountability. ODE needs the power to audit and remove funds from non-compliant districts.	11/3/2015 11:43 AM
200	Accountability without funding seems unfair and standards are overly vague. Why doesn't gifted education receive more outcome based measures? Seems like no outcomes are measured.	11/3/2015 10:55 AM
201	value-added is a statistically flawed measure	11/3/2015 10:37 AM
202	An identification and service plan can be beautifully-written fiction. Districts must provide evidence that the plans are implemented with fidelity. Without more specificity of service than what is in the proposed rule, the gifted indicator on the annual district report card is meaningless.	11/3/2015 10:27 AM
203	There is no minimum level of services that a district must provide. It only states that districts must provide a reporting of testing and identification.	11/3/2015 9:25 AM
204	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/3/2015 9:15 AM
205	There are no clear standards, so there can be no clear expectations. The report card indicators are based on a lot of nothingness, so they are meaningless. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	11/3/2015 8:58 AM
206	Now that gifted is on the report card, many of my school districts are identifying and serving gifted students in the arts to gain an additional 2 points - which is a significant gain for some schools to meet their required point goal. Fine arts teachers are learning to write WEPs in order for gifted students in grades 7-12 to be counted as "served" in fine arts. This is a very positive leap of progress!	11/3/2015 8:29 AM
207	The gifted students should grow just as much or more than the other students in the district.	11/3/2015 7:43 AM
208	Evaluation of gifted education services should include far more aspects and data points than just "the level of service provided by districts, the performance of gifted students on state assessments, and the value-added growth measure for students." There have been volumes and volumes of research and books on the topic of evaluation of gifted services that you can use as resources. If, as they say, "what gets evaluated is what gets taught," then - given these three points of evaluation - your gifted services will end up focusing on gifted students' test scores. These kids - all kids - are so much more than test scores. And the services gifted students need from their schools are about so much more than just academic growth and testing. That is something, yes. But it's certainly not everything. Frankly, most state tests have such a low ceiling that growth of gifted learners can't even be adequately nor accurately measured by them. Therefore, trying to document "growth" by which to evaluate the gifted services is not always possible. If the kids are hitting the ceiling of the test in the beginning and they're still hitting the ceiling of the test in the end, we don't know if they've grown, let alone where they actually began and ended.	11/2/2015 11:42 PM
209	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/2/2015 11:00 PM

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210	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	11/2/2015 10:45 PM
211	It seems that the proposal renders the gifted indicator useless, so there will be no true evaluation of gifted services in the proposal. Ideas... reinstate ODE audits and allow ODE to remove funds of non-compliance from current standards (ORC) more effectively collect data on specific inputs to determine the effectiveness of services incorporate the gifted performance indicator into an annual report presenting the state of gifted education in Ohio reinstate service requirements and staffing requirements that are part of the current operating standards (will need to include waivers) include ORC language to allow ODE to remediate and reconfigure gifted services in districts that are failing gifted students reinstate the district service plan (ORC)	11/2/2015 9:25 PM
212	Showing growth in the gifted population has been historically and notoriously difficult. The report card does NOT take this into account.	11/2/2015 9:07 PM
213	This is very confusing language. What does this mean for an underperforming school? Are you going to reduce their G & T funding? That makes no sense. Please re-format your language so we can actually understand what you are proposing. Much of these policies are incredibly difficult for a parent with a masters degree to understand. It feels a little bit like that is on purpose, so that things can get past, budgets can get cut without us noticing. Please create policies and plans that we can clearly understand. Tell us what you are planning to do and how you are planning to assess and hold folks accountable to providing the most quality education for our G & T students.	11/2/2015 9:03 PM
214	The report just calls for them to tell what services are available not what they actually will do for each child. Having numbers of students identified is useless unless you know that they are also actually receiving the services they really need.	11/2/2015 8:49 PM
215	My concern is that the proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. PLEASE! PLEASE! PLEASE! 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/2/2015 8:46 PM
216	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/2/2015 8:00 PM
217	Gifted service must finally be reported on district report cards to help make it important to district.	11/2/2015 7:59 PM
218	I think the gifted indicator holds districts accountable for more than the law requires and creates confusion to parents. The law should match the report card measures.	11/2/2015 7:40 PM
219	It states what needs to be turned in but no guidelines as to appropriate services. The value added is often misleading with gifted students because they are already above the material being tested It may not show a year's growth since they already at the top end of the test.	11/2/2015 7:28 PM

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220	Why are gifted services included on district report cards if certified teachers are not required?	11/2/2015 7:27 PM
221	The "gifted indicator" itself wasn't clear. So including it in the district report card may or may not make any difference. Is July 15th when all the other school data is submitted? If not, why is this a different date (would be difficult for the data analysis that has to happen to produce the report cards). The other information seems the same. Or would "value added growth" somehow actually be implemented for gifted students (ie, if you get 99% on tests, there's not much room for growth on that same test over the year). And if every district implements its own qualifications/standards, how can students in one district possibly be compared to another district in this regard?	11/2/2015 7:19 PM
222	There is no accountability component to these proposed changes; reporting is not the same as accountability. The changes do not specify what the minimum standard is and HOW the districts will be held accountable for not reaching that standard.	11/2/2015 5:23 PM
223	Why should a district or building be punished when parents(and kdis) are wise enough to see that gifted education isn't what it is cracked up to be. I know of many identified kids who begged to drop out of the program, especially pullouts, because of the stigma attached. Or for that matter, how it interfered with something they would rather do.	11/2/2015 4:18 PM
224	Abolish state-run schools.	11/2/2015 4:08 PM
225	Simply testing, assessing and identifying students as "gifted" is meaningless without actual programs that serve them and encourage their growth. This seems to be saying schools will be within guidelines if they meet reporting deadlines for identifying gifted students ... even if they aren't providing services for the children.	11/2/2015 4:02 PM
226	Use of the term "indicator" in item number 5 had my eye twitching. What specifically does "indicator" mean? It could mean a roll of the dice for all we are told in this document.	11/2/2015 3:51 PM
227	Most gifted kids can blow these test scores out of the water. Why are outputs the only things that matter? Kids are more than test scores.	11/2/2015 3:38 PM
228	As the proposed rule renders much of the gifted indicator useless, there will be no true evaluation of gifted services in the proposed rule. Recommendations: 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	11/2/2015 3:35 PM
229	Incorporate data collection to determine effective services and reinstate ODE audits. I feel it is important to reinstate the service and staffing requirements, specifically gifted intervention specialists and coordinators qualifications to provide services.	11/2/2015 2:41 PM
230	Accountability is not significant if districts are not required to provide meaningful services	11/2/2015 2:20 PM
231	Reinstate the old accountability measures. Bring back gifted audits.	11/2/2015 1:48 PM
232	Need specifics! data collection and reporting? staffing requirements?	11/2/2015 1:47 PM
233	This all sounds great if the state follows through, because if they don't the most of the schools woln't comply	11/2/2015 1:30 PM
234	While I generally agree I would like more publicly available data on section E.(5) Accountability and value - added growth; again this seems like you're using a formula for either teacher or student evaluations that is too narrow and would put both teachers and students in a cycle for teaching for the test; since State and National Benchmarks are below what we should be aspiring to obtain I don't know that they would align with G&T; also since G&T is best implemented to meet the needs of each individual student then requiring the Gifted and Talented Specialist to sacrifice time to "teach to the test" runs counter to the ideals and objectives to teaching those with Superior cognitive ability as you would want to align with this ability which State and National Test are normalized and align with the academic abilities of the average student so this seems contrary to G&T objective; further our U.S. President Barack Obama just said our nation needs to reduce testing not add to it. Gifted and Talented students are frequently assessed through other measures such as Intelligence test so again the need for value - added growth is questionable? Further these educational experts represent the best and brightest teachers so why make them "prove" themselves again when their special licensure requirements is evidence enough? So I do not agree with this section, again it seems politically motivated not a genuine attempt to increase quality in our schools and seems in fact intent on suppressing excellence.	11/2/2015 1:24 PM
235	Question #1 - The only way the submission of an annual plan sets a clear expectation is by establishing state minimum standards for gifted students. Is this established in this rule?	11/2/2015 1:16 PM

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236	On a side note: This survey is poorly designed in that the questions are not listed on the same page as the aspects of the proposed rule that we are answering questions about..... very difficult to answer the questions without being able to remember every detail of the proposed rule from the page before.	11/2/2015 12:51 PM
237	We should not have a description of service, but requirements for level of service Local report card "indicators" are not specified. What metric is being used for this report card?	11/2/2015 12:48 PM
238	The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources.	11/2/2015 12:29 PM
239	Where do parents provide their input? Shouldn't external review boards be involved to hold the school district accountable? The school district reports to the state and the constituents have little say in the success of the program. I would suggest a customer (students and parents) feedback loop.	11/2/2015 12:24 PM
240	The use of single sitting standardized tests are completely ineffective in the measurement of students, teachers, and school districts in their ability to provide any instruction, which includes the instruction of gifted students. Alternative measures should be undertaken to evaluate education in Ohio, including gifted programs.	11/2/2015 12:03 PM
241	Again, I will suggest including some kind of survey or test that will help determine the qualifications and performance of gifted specialists working in the classrooms.	11/2/2015 11:28 AM
242	The annual plans, while a good attempt to communicate, do little to ensure good service. They are basic "boilerplate" documents that confuse parents more than help them so do little to improve what happens for gifted students. These should be changed or another one added that simply makes a district report exactly and simply what grade levels it does whole grade testing, what criteria is used for service, what grade levels it serves appropriately, and any other pertinent opportunities for gifted students without all the "educanese" that is totally overwhelming to many parents. As it stands, they are just compliance documents that create work for gifted staff but do not improve communication or service. If there is no public accountability via the report card, there will be less and less service for low income and rural students. Affluent, white, Asian and Indian children will dominant the landscape of gifted classes and services and the gap will grow between the classes - quite elitist. The performance index calculation and the input points section is the only thing driving any change currently. Take those away, and there will be total dismissal of programs and services. Teachers unions also fight any changes to gifted as they feel overly taxed in other areas with little support, coupled with the notion that gifted children will perform well without any guidance or challenge. The total misuse of gifted WEPs is a great example of how convoluted the difference between well-intentioned policy and actual implementation can become. Most of these in my area are mere compliance documents with little integrity.....but districts welcome them so they can claim input points for service.	11/2/2015 11:22 AM
243	I don't believe our district even has annual plans and "clear expectations" for services is another issue. 30.9% of our students were identified as gifted. Yet if you look at the State report card you see that less than 3% are receiving services. The wording on the second question asks us to rate the gifted indicator and it's use on the report card but then ties it into how it is outlined in the proposed rule. These should have been two different questions. Yes, the gifted indicator is essential in the evaluation of gifted education. But as outlined in the proposed rule? ha.	11/2/2015 10:52 AM
244	"The district shall prepare an annual report on the number of students screened, the number of students assessed, and the number identified as gifted in each category" - Districts also need to report number of students actually served.	11/2/2015 10:39 AM
245	I would like to see a little less emphasis on outputs and more on quality inputs. And please provide more funding.	11/2/2015 10:25 AM
246	The language of the requirements is too vague.	11/2/2015 10:24 AM
247	Again, a definition of gifted is missing -- clarity in rules depends on stated levels of identification (and there may be differing levels. One child is gifted at one standard deviation, but children can be gifted at many levels and require much different accommodation to meet their needs.	11/2/2015 10:16 AM
248	Sure components of the gifted indicator are important, but the indicator is new and maybe there are other things that should be included. The district plan required in ORC should be included in the rule as well as the audit language. Why isn't ODE auditing districts on gifted? It's the law. Why does ODE think it doesn't have to comply with the law? Why not get creative and allow ODE to pull gifted funding and students out of districts if districts don't want to do anything for them? That would be true accountability at the true local level -- the parent and student level.	11/2/2015 10:12 AM
249	There should be help with funding from the state, just like there is with other special educational services.	11/2/2015 9:38 AM
250	1. Reinstate provisions that require ODE to perform audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Rationale: ORC section 3324.05 requires ODE to audit districts every three	11/2/2015 9:38 AM

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years for compliance with identification laws. In addition, it stipulates sanctions for districts that are in non-compliance. The removal of this provision defies the intent of Ohio Revised Code. It underscores the fact ODE has not fully complied with this statute for decades. Districts are not audited every three years on gifted identification and services, which is why too many districts do not even comply with basic identification laws. While ODE has performed limited audits over the years, it has never been in full compliance with the law, which could be an issue for the Auditor of the State to review. Audits and the threat of sanctions are major tools in the compliance/technical assistance toolbox that ODE has used on a very limited basis. ODE has, in the past, threatened to withhold funding for districts chronically out of compliance with gifted laws. The threat of such resulted in positive changes for gifted students in multiple districts over the years. The removal of this provision is unfortunate. As gifted services are not mandated, there is very little else to ensure districts comply with other requirements in the law. There is evidence that, rather than improving this situation, compliance has become even more lacking. Up until the 2013-2014 school year, ODE posted the results of on-site gifted audits in the gifted area of the ODE website. Unaccountably, it appears ODE stopped performing on-site gifted audits after the 2012-2013 school year. To date, there has been no official response as to why. This is despite the fact that almost 5% of Ohio's districts (over 600 ADM) do not report enough gifted students to receive a gifted value-added subgroup score or gifted performance index score. There are multiple districts that do not report any identified gifted students. This would be a strong indication that many districts are out of compliance with the gifted identification law and are misusing gifted identification funding. Almost one-quarter of Ohio's districts do not provide any gifted services. Removal of the language in the operating standards that compels ODE staff to continue to perform the gifted audits and to stipulate sanctions for districts out of compliance signals to districts that ODE and the State Board of Education do not plan to hold districts accountable for laws regarding gifted students. Districts, as well as ODE staff, look to operating standards, not ORC, to guide practices. The 9.11.15 draft devolves accountability to the extent that it appears the State Board of Education is disempowering itself and ODE to a point where neither body will be able to provide leadership on gifted education issues or meet their responsibilities related to stewardship of state fiscal resources. OAGC recommends that all audit and compliance language with regard to gifted education be reinstated.

2. Incorporate data collection on specific inputs to determine the effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Rationale: One of the bright spots in the draft standards passed by the Achievement Committee on 11.11.13 was the inclusion of additional data collection on specific inputs to determine the effect of gifted services as well as an annual report on the condition of gifted education. This language is curiously removed in the current 9.11.15 draft. In addition, the 9.11.15 gifted operating standards draft limits the elements of the gifted performance indicator to those currently included. As the indicator is new and scheduled to be updated in the next year or so, it does not make sense at this time to limit the indicator to only value-added, state assessments, and service levels. Limiting the elements in the operating standards also counters the intent of the Gifted Indicator Work Group who, in the course of the meetings while developing this indicator, discussed the need for ongoing review as data emerged and as new state assessments were introduced. Specifically, the March 25 and May 7, 2014, meetings included conversations with all stakeholders agreeing a review would be needed to determine the appropriateness of thresholds following the initial data from PARCC assessments and to consider the role other elements, such as fiscal accountability and use of acceleration practices, might play in future iterations of the indicator. The 9.11.15 draft ties the hands of the State Board of Education to re-evaluate the indicator on a timely basis and revise it with necessary components without having to also revise the gifted operating standards. For the benefit of gifted children, ODE and the public should be able to determine if districts are implementing the operating standards with integrity. As Ohio moves to a more outputs-driven system, more data to assess the effectiveness of gifted services is required, not less. Based on the 11.11.13 draft, OAGC recommends that this section be revised to incorporate more data elements to be collected and reported to the public so that districts are fully transparent about what services are being offered by whom and what the results are if they can be determined.

3. Reinstate service and staffing parameters that are in current operating standards. Incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing. Rationale: As all quality elements of service and staffing are eliminated in the 9.11.15 draft, no waivers are required. In essence, all laws and rules have been automatically waived for all districts, regardless of their track records with respect to effectively serving this population. OAGC recommends that some of the waiver provisions outlined in the 11.13.13 draft be revised based on the gifted performance indicator and reincorporated into a new draft. This would be contingent on the acceptance of the recommended standards for service and staffing advocated by OAGC. Also, OAGC recommends that additional accountability provisions be included from ORC.3317.40 (D), which states that, if a district does not meet the gifted performance standards of satisfactory achievement adopted by the state board of education for two consecutive years, the department shall require the district or school to submit an improvement plan. This type of requirement is already in place for special education and programs for English Language Learners. This would be familiar for districts if implemented for gifted education. If the district fails to improve to a satisfactory level in an additional two years, the department shall direct the district to partner with another organization that has demonstrated the ability to improve the educational outcome for that subgroup of students to provide services to those students. The partner organization may be another school, district, or other education provider. This language would be fully in line with the ODE's position that districts that are chronically non-performing should be reconstituted.

4. Reinstate the district service plan as required by ORC. Rationale: ORC 3324.07 requires districts to submit an annual service plan and allows the state superintendent to require districts to implement the plans. Effectively, it gives the state superintendent the authority to mandate gifted services. While the current

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	superintendent may not wish to use this authority, future superintendents may. This language should stay in the operating standards to preserve the authority of the state superintendent and State Board of Education.	
251	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	11/2/2015 9:03 AM
252	My concerns: The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. I recommend the following: First and foremost: STOP THE ATTACK ON THE GIFTED. GIFTED PEOPLE HAVE RIGHTS TOO. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC. Lastly, I cannot believe that we are here again. I'll never understand why some people feel as if it is okay to allow some students to suffer just because those students have abilities beyond their typical peers. We are educators, not "stagnant growth producers". Every time I think about this rule proposal, all that keeps going through my head is -- "Have they lost their minds?!" One day, maybe one of the legislators will explain it to me. Why am I thousands of dollars in debt just to gain an education to serve students that are always ignored and to an extent, bastardized? Why is this happening? They're children!! Bright, wonderful, children--who deserve the opportunity to learn and grow just as much as their peers sitting right next to them. Next time this happens, I'd would like each of you to come explain this to my class. Come tell it to their faces why they are less important to you than those sitting next to them. Tell them why because they have a "gift", they do not have a right to learn at a pace and level that is appropriate for them, much like my high school guidance counselor told me. This has to end. Gifted people deserve the right to learn appropriately.	11/2/2015 8:58 AM
253	There should be mention of what each district is doing to serve its gifted population.	11/2/2015 8:50 AM
254	Once again, there is no requirement for the time allotted to specialized instruction. Measuring quality by using standardized testing is absolutely the wrong way to determine how well these children were served. Many are going to excel on these tests and show improvement no matter what instruction they have received. The merits of a gifted program are not easily measured, as the ultimate goal must be to stimulate a child to stay engaged in the learning process when the normal classroom experience does not provide any challenges.	11/2/2015 8:41 AM
255	The annual district report card is based on unreliable and unvalidated standardized tests. Please stop the "test and punish" regime. The proposed 2% of time spent for testing is still over 20 hours, that is ridiculous. Let teachers teach. Let children learn.	11/2/2015 8:26 AM
256	There is no recourse for the parent if they don't think that the proposed services will meet their students needs.	11/2/2015 8:13 AM
257	I've never been a fan of the district report cards. I do not believe it is "essential" to include this information on the report cards as a means of evaluating the services.	11/2/2015 8:10 AM
258	Can we just let the teachers teach and stop talking about accountability!?	11/2/2015 7:16 AM
259	VAM and state assessment scores should not be used in evaluating a gifted program.	11/2/2015 7:03 AM
260	This seems to complete miss the idea of "quality" in gifted education. Where are the measurable SAS to how a district's gifted program produces results?	11/2/2015 6:42 AM
261	A few more specifics would be useful.	11/1/2015 2:08 PM
262	Again, you are asking the wrong questions. This draft has no proper accountability. ODE should start over, work with gifted experts and other district personnel and come up with something better. It is stupid to tie the indicator to current metrics. These are going to change as more elements on the report card come into play.	11/1/2015 1:56 PM

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263	<p>The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE to reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the gifted output measures with which to hold districts accountable. ODE is out of compliance with the agency's statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in the current operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	11/1/2015 12:17 PM
264	<p>How can Districts be accountable if they are not given the appropriate teachers and funding? So much money is spent in identification for nothing.</p>	11/1/2015 10:30 AM
265	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	10/31/2015 11:14 AM
266	<p>The gifted performance indicator isn't going to have any teeth if services aren't clearly defined. It says that the indicator will take "levels of service" into account. There is no criterion that outlines "levels of services". I recommend breaking down the components of the indicators so that everyone understands how to achieve excellence, and so that there is equality within the measurements of the indicator (i.e. everyone is getting measured on the same thing... and what is measured is clearly defined) As it stands right now, it's all very vague.</p>	10/30/2015 5:06 PM
267	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in the ORC. Incorporate data collection on specific inputs to determine effect of services. The gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education. Reinstate service and staffing requirements that are in current operating standards. With reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on gifted performance indicator. Reinstate the district service plans as required by ORC.</p>	10/30/2015 3:21 PM
268	<p>Include the results of the gifted performance indicator into an report outlining the condition of gifted education in Ohio. Reinstate current service and staffing requirements</p>	10/30/2015 3:16 PM
269	<p>The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review.</p>	10/30/2015 3:15 PM
270	<p>1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.</p>	10/30/2015 2:14 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

271	I am very concerned that the district's plan has been afforded the power to explain the district's gifted criteria used to determine that educators are appropriately trained to provide gifted service. Ohio's districts should be allowed to have a variable response as to the determination of gifted teachers' training requirements! If the ODE's report card indicator on gifted is supposed to reflect the level of service provided by districts, the performance of gifted students on state assessments, and the value-added growth measure for students, then it needs to be based on consistent, hard data. If every school district in Ohio reports performance data that is based on services with phantom accountability, then that indicator has ceased to have any statistical value.	10/30/2015 12:13 PM
272	Cheeseburgers or Kobe beef? The report card is a joke. Affluent districts will continue to do well and economically disadvantaged districts will cut costs and the achievement gap will continue to grow.	10/30/2015 11:48 AM
273	The expectations are not clear and should be. We strongly agree that the gifted indicator should be in the report card. "We disagree because the wording of the rule renders the report card useless."	10/30/2015 10:32 AM
274	ODE audits should be reinstated along with staffing requirements and district service plans.	10/30/2015 9:51 AM
275	Too often the state assessments do not have a high enough ceiling to measure the growth of gifted students. In addition, appropriate testing for students who have been grade or subject accelerated is not provided for in the rule. This penalizes districts and students.	10/29/2015 8:03 PM
276	All gifted students in Ohio should have the same requirements for identification.	10/29/2015 5:08 PM
277	There are many ways to measure gifted progress. Standardized tests do not show how much a student has grown and do not necessarily meet the needs or show the development of a gifted mind.	10/29/2015 3:51 PM
278	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Reinstate the district service plan as required by ORC.	10/29/2015 3:24 PM
279	Identification versus service is unclear to me. This survey misses the important part of the gifted operating standards.	10/29/2015 12:57 PM
280	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, incorporate data collection on specific inputs to determine effect of services, reinstate service and staffing requirements that are in the current operating standards as stated in the service section, and reinstate the district service plan as required by ORC.	10/29/2015 12:01 PM
281	Most of the districts in my area have decided they do not care about "points" and do not care about the report card. This is an attempt to back door service and it can only be handled by wealthy districts. The indicator needs to go.	10/29/2015 10:39 AM
282	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Reinstate service and staffing requirements that are in the current operating standards as stated in the service section. Reinstate the district service plan as required by ORC.	10/29/2015 8:48 AM
283	What happens to non-compliant districts? If there is no consequence, many districts will not submit these plans. The gifted indicator is meaningless if districts are not required to provide services. For those districts which show strong growth, flexibility can be granted.	10/28/2015 8:57 PM
284	The rule needs to be more clear about the components involved in the indicator and how they are achieved. When looking at how "points" are accumulated, this is not spelled out in this proposed rule.	10/28/2015 8:24 PM
285	This is ridiculous - why can't this just be provided by the state - waiting for districts to come up with a plan is a waste of time. Not to mention all of these different plans lead to unfair differences in services between districts	10/28/2015 6:38 PM
286	With no descriptions of service options offered by ODE, how will districts be compared for their services provided. What will the minimum or maximum of service be?? In section (5) identified students are not listed as part of the indicator. Isn't that an essential piece of determining the other indicators. Although there is an indicator, districts will not be able to be compared due to the different criteria set by districts. All criteria should be set by ODE with the option to have minimal flexibility for setting services. Waivers are written for this purpose.	10/28/2015 3:43 PM
287	Upfront, the gifted indicator input section works against the small schools who do not have the number of students (10) required to even earn points on some of the sections. Many of the smaller districts are trying to work with their students but are discouraged by the prohibitive nature of some of these points. In addition: 1. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 2. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 3. Reinstate the district service plan as required by ORC.	10/28/2015 3:33 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

288	How can gifted services be measured in a fair and accurate way if districts will allowed to determine their own service criteria (and not following Operating Standards). How can the effectiveness of gifted programming be measured if districts are not operating under the same guidelines? Answer...it can't.	10/28/2015 2:37 PM
289	OAGC concerns: The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. OAGC recommends the following: 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	10/28/2015 12:52 PM
290	A little unclear on guidelines used to report that educator is qualified to work with gifted students. Also, on delivery method of reporting identification process to parents.	10/28/2015 11:14 AM
291	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	10/28/2015 10:05 AM
292	The annual district report cards are not helpful, effective, and cause more confusion in the community. Again, the gifted funding is mainly spent on the identification screenings and assessments.	10/28/2015 9:23 AM
293	This looks good with an organizational outline more included in the first section.	10/28/2015 8:12 AM
294	The way the proposal has been written leaves the allowable types of services and the quality of the educators providing services entirely within the power of districts. With no standardization of the definition and quality of services, there can be no way to compare different districts, since they will each be making their own rules. The gifted indicator will then provide no helpful feedback for administrators, teachers, parents and communities. The proposal needs clear definitions of quality gifted services, and the state needs to have the authority to monitor districts' services to ensure their submitted service plans match the services they are providing in reality.	10/28/2015 8:06 AM
295	No	10/27/2015 10:56 PM
296	Perhaps the Department would like to butt out.	10/27/2015 8:21 PM
297	Many districts choose a 3rd party vendors like MAP to assess for the TGRG diagnostic due to the lack of quality and alignment of the State Diagnostics. Districts may have no intention to use these 3rd Party assessments for gifted service, but to use them for classroom differentiation are penalized on the State Report Card for not serving identified gifted students even though other districts have the same "gifted students" & use the State assessment (with no gifted ID component) and are rewarded with a better State Report Card.	10/27/2015 8:06 PM
298	Again, with no real specification for service, the gifted indicator is useless. It has no meaning if there isn't a standard by which to judge.	10/27/2015 4:02 PM
299	It doesn't say anything about services!	10/27/2015 3:56 PM
300	The only reason many districts follow gifted guidelines is a potential audit. This provides no impetus for compliance with best practices or ODE regulations.	10/27/2015 3:29 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

301	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	10/27/2015 2:54 PM
302	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	10/27/2015 2:53 PM
303	<p>ODE should be required to do gifted audits and remove funds of non-compliant districts. Language should be included in the ORC to do that. Include data collection on specific inputs to determine effect of services. The results of the Gifted Performance Indicator should be included in an annual report that outlines the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirement that are in current operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstituted gifted services in districts that are chronically failing fited students. Reinstate the district service plan as required by ORC.</p>	10/27/2015 1:54 PM
304	<p>Requirement that allows for ODE to remove funds for non-compliance of current standards upon determination from ODE audit as indicated in ORC. Reinstate service and staffing requirements that are in current operating standards. Include means for data collection on specific inputs to determine effect of services.</p>	10/27/2015 1:46 PM
305	<p>How is this fair to small schools which don't have money given to them for appropriate funding? When are the gifted students going to receive the same amount of funding that is given to special education students?</p>	10/27/2015 11:32 AM
306	<p>Quality and measures for assessing quality of services are not addressed.</p>	10/27/2015 11:23 AM
307	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	10/27/2015 10:57 AM
308	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC</p>	10/27/2015 10:45 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

309	<p>OAGC concerns: The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. OAGC recommends the following: Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	10/27/2015 10:40 AM
310	<p>I feel as though our gifted students are being counted for us three times. In both the gifted indicator, in the progress category, and overall value added.</p>	10/27/2015 9:21 AM
311	<p>No</p>	10/27/2015 8:39 AM
312	<p>The newest iteration of the reporting made it difficult to provide anecdotal evidence and provide context. So, there is the potential for accurate reporting if those instances can be provided for within the reporting mechanism. As for the gifted indicator, will districts be required to report similarly. For instance, if a student is in 8th grade and taking algebra, there is vagueness--depending on how the class is coded--as to whether that would be a gifted acceleration or gifted service. The "muddiness" needs to be cleared up a bit for truly accurate reporting.</p>	10/26/2015 10:11 PM
313	<p>Item 5 indicates scoring districts on the "level of service provided by districts". The levels of service referenced here should be specifically indicated both here and in the proposed "Services" rule, especially pertaining to defining quality.</p>	10/26/2015 7:34 PM
314	<p>Don't mess with what's not broken; please keep the provisions in the current law! Loosening the requirements will only hurt gifted students in Ohio.</p>	10/26/2015 3:04 PM
315	<p>If the process and expectations for identification do not follow ORC and proper testing procedures then plans and reports are based on flawed data. With the proposed changes in the standards the indicator has lost credibility. When one adds the lack of reliable test data and the low expectations with current data the indicator is meaningless. Therefore, the changes must be made to the standards in order for adequate accountability.</p>	10/26/2015 2:50 PM
316	<p>What is going to hold the districts accountable for properly serving gifted students????? Essentially there is no leadership for gifted education???</p>	10/26/2015 2:35 PM
317	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	10/26/2015 1:21 PM
318	<p>Add: Prior to the beginning of each school year, the district shall distribute its approved identification and service plan to TEACHERS. We need to know about any changes or updates to state/district policies in order to intelligently communicate with parents.</p>	10/26/2015 12:58 PM
319	<p>There need to be audits in place (that actually happen) to ensure that those plans are FOLLOWED and not just submitted and forgotten. Similarly, there needs to be a consequence for lack of compliance, such as withdrawal of funds for districts whose actual services to not meet the expectations in their plan and/or whose Gifted students habitually underperform.</p>	10/26/2015 12:47 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

320	<p>1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.</p>	10/26/2015 11:48 AM
321	<p>Since the specific language for service has been removed and the qualifications within districts of who can serve gifted students changed as well, neither of these things is guaranteed. Clear expectations aren't outlined for service anywhere, so while a district can report service, how would they know what was expected? And while measuring effectiveness of gifted services is helpful, none of the proposed rules outlined here are sufficient to creating an even playing field on which to judge.</p>	10/26/2015 11:40 AM
322	<p>Reinstate ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. Also, the components in the gifted indicator now no longer mean anything as all guidelines for service have been removed. Reinstate a common definition of served.</p>	10/26/2015 11:25 AM
323	no	10/26/2015 10:55 AM
324	There has not been enough training for staff on the gifted indicator and gifted services.	10/26/2015 10:00 AM
325	<p>There needs to be specific standards to determine effective services. The results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. The district service plan as required by ORC needs to be put back into the standards. Waivers need to be added on the basis of performance on multiple measures including but not limited to the gifted performance indicator. We need to add the ODE is allowed to remediate and reconstitute gifted services in districts that are chronically failing gifted students.</p>	10/26/2015 9:58 AM
326	<p>Until testing lines up with current curriculum and is consistent in evaluation tests as a ranking is an inaccurate measure. It is hard for a gifted student to 'dumb down' to go back to math they had years prior or evaluate a poorly designed question. They will over think in both cases because the test does not reflect their giftedness. If we say gifted students learn differently how do we expect normal testing results. Additionally, the value added is hard to measure if you get a 100 every year.</p>	10/26/2015 9:34 AM
327	<p>1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.</p>	10/26/2015 9:33 AM
328	<p>1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.</p>	10/26/2015 9:24 AM
329	<p>State designed assessments have nothing to do with the quality of gifted services. Any ties between funding and testing or reporting are ethically wrong.</p>	10/25/2015 11:14 PM
330	<p>The annual plans need to be provided -- it does not outline the specifics to include in the plans. Gifted students already score very high in testing. For example, the OAA tests, if a student scored 99%, what room for growth is there the following year?? Also, in order to be identified as gifted, the students need to score certain percentages. If the indicator merely lists the gifted students score, what usefulness is that really??</p>	10/25/2015 8:42 PM
331	<p>Why is the ODE trying to make gifted education an afterthought? Do these kids and the development of their exceptional skills matter at all? I get the impression that you believe that gifted programs are a waste of the state's money. No wonder we have so many underachieving students with tremendous gifts who will never know how or even want to develop and extend them.</p>	10/25/2015 8:05 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

332	There is no specification for minimum standards. There simply must be a minimum standard if a district is to call something "gifted services" otherwise districts will simply provide gifted children with more of the same work, or have them tutor other kids and call it gifted services. I have seen this done before.	10/25/2015 7:14 PM
333	Unrealistic expectations	10/25/2015 1:15 PM
334	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	10/25/2015 12:35 PM
335	You can put any plan you like in place ... but where will the follow up and accountability come from? A plan is only worth how its implemented and utilized. Submitting paper, brochures and more policies fall short of the actual service of the gifted population.	10/25/2015 11:55 AM
336	N/A	10/24/2015 9:23 PM
337	Reinstate the provision of ODE audits and the ability to take away funds for non compliant schools. Incorporate data collection from specific inputs to measure the effectiveness of gifted services. Reinstate staffing, time, and caseload requirements into the law so that all districts are held accountable at the same level.	10/24/2015 5:26 PM
338	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	10/24/2015 4:48 PM
339	The strikes me as unnecessary bureaucracy. In a local control state, we shouldn't have the state confirming for our constituents that our gifted services plans meets that statute or rule. That's why we have local boards who hire a Superintendent. For sure, report the findings on the report card but that should be the extent of state involvement.	10/24/2015 11:20 AM
340	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	10/24/2015 10:05 AM
341	Point 4 states: "4) Prior to the beginning of each school year, the district shall distribute its approved identification and service plan to parents." However, traditionally this has been done poorly. They do not notify the parents through their handbook of services, in many districts. They do not currently explain programs like post secondary or send home information to the parents for students eligible for high school (8th through 11th grade students). Credit flex, although suppose to be offered to all students in H.S. or taking H.S. courses (like in junior high) are not offered or parents made aware of these programs, except in the schools online ByLaws which MANY parents are not aware of or how to access them. The current laws are clear, but not enforced. The same problem here. The proposal is lack in specifics on how parents will be notified and penalties for districts/or options for parents not notified. Point 6, states: "6) The district shall prepare an annual report on the number of students screened, the number of students assessed, and the number identified as gifted in each category." Why does it not cover statistics on NUMBER OF STUDENTS SERVICED and those students service, how are they serviced by category?	10/23/2015 11:46 PM

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342	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	10/23/2015 5:32 PM
343	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	10/23/2015 5:15 PM
344	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	10/23/2015 5:06 PM
345	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	10/23/2015 4:58 PM
346	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards as stipulated in ORC. Reinstate service and staffing requirements that are in current operating standards as stated in the service section. Reinstate the district service plan as required by ORC.</p>	10/23/2015 3:07 PM
347	<p>Where is the comparison of the proposed rule to the previous rule? Not enough information to answer in an educated manner.</p>	10/23/2015 3:01 PM
348	<p>I think there should be special indicators for 2E students.</p>	10/23/2015 2:51 PM
349	<p>How can you have "clear expectations for identification and service" when those expectations are not clearly identified in the rule? We need the ODE audits and penalties for non-compliance. We need staffing and service requirements. We need specific inputs for data collection in order to determine whether the services we are using are effective.</p>	10/23/2015 2:18 PM
350	<p>What accountability? This hardly specifies what data is to be reported nor what consequences can be expected for non-compliance.</p>	10/23/2015 1:50 PM
351	<p>E(5) "the indicator shall reflect the level of service provided by districts" is vague. What does level of service really mean here?</p>	10/23/2015 1:27 PM
352	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	10/23/2015 11:09 AM

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353	The WEP for my two boys has been a copy and paste of last year each year with no specific details about their specific needs so I believe it is a copy and paste for the entire class. I think WEPs should have stringent requirements like IEPs,	10/23/2015 10:53 AM
354	Not sure how this will work	10/23/2015 10:38 AM
355	As a state, we need to revisit the definition of gifted education prior to focusing on accountability.	10/23/2015 10:36 AM
356	Not sure it is fair to indicate on the public report card because lack of enough funding to service the number of kids identified.	10/23/2015 10:34 AM
357	Who is checking to make sure that schools are actually providing services that they report? I do not see any accountability for this.	10/23/2015 8:56 AM
358	the proposed rule renders much of the gifted indicator useless, there will be no true evaluation of gifted services in the proposed rule	10/23/2015 8:11 AM
359	ODE needs to check to see if districts are actually implementing the service plan they claim they have. Some districts say they are servicing, but really aren't. They are taking the funds, putting the money into the general fund, using the money for other things, and not really servicing the kids. This is the reality right now in gifted education.	10/23/2015 7:30 AM
360	Again, it assumes a service plan. What if districts do not provide gifted services? Is this implying that anything constitutes service and every district can claim they serve gifted students? I believe this is misleading to parents. You are required to distribute the plan to parents each year, but are there no guidelines for the service? Also, what constitutes a valid way to distribute this information?	10/23/2015 4:19 AM
361	There are very unclear expectations for identification, especially in the arts and in creative thinking which this draft drops as areas of gifted identification in Ohio. It would be hard to say that clear expectations for reporting gifted services exist in this draft when there are no clear expectations of what constitutes a gifted service. Given that this draft allows districts to determine what is a gifted service, the use of the indicator would be meaningless since huge inconsistencies in service identification would exist among districts. Again, some minimum qualifications of what makes a gifted service a gifted service is needed so that the gifted performance indicator has some degree of validity.	10/23/2015 12:31 AM
362	The use of measures for gifted student in regards to value added is inappropriate. IF the tests could truly measure gifted students this would be a different issue. The tests lack the ability to show the true range of gifted students, therefore this measure is stat. inaccurate- please review basic stats for regression to the mean. The use of gifted, or special education, as sub groups in reporting is not appropriate and this practice should be reconsidered.	10/22/2015 9:25 PM
363	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	10/22/2015 7:06 PM
364	Reinstate the district service plan as required by ORC.	10/22/2015 5:58 PM
365	Since the proposed rule renders much of the gifted indicator useless, there will be no true evaluation of gifted services in the proposed rule. SPECIFIC CHANGES: 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	10/22/2015 4:53 PM
366	This survey is meaningless without a comparison to the previous rule or any context provided.	10/22/2015 4:13 PM

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367	<p>The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.</p>	10/22/2015 3:15 PM
368	<p>Concerns: The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. OAGC recommends the following: 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.</p>	10/22/2015 2:56 PM
369	<p>1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.</p>	10/22/2015 2:44 PM
370	<p>The reinstatement of service and staff requirements at least to the level required in the current operating standards is prerequisite to any level of accountability. If service and staff requirements are undefined, then districts may reasonably be expected to report that all gifted students are served. There is no mechanism for parents or the department to hold districts accountable for the quality of the services. The gifted indicator becomes meaningless; since all services are undefined it will not be possible to determine what services are most/least effective for Ohio's gifted students.</p>	10/22/2015 2:43 PM
371	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	10/22/2015 2:27 PM

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372	<p>Concerns: The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. Recommend the following: Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	10/22/2015 2:19 PM
373	<p>1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.</p>	10/22/2015 2:00 PM
374	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	10/22/2015 1:54 PM
375	<p>The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. Changes: 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.</p>	10/22/2015 1:25 PM
376	<p>I would recommend the following: ~Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. ~Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. ~Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. ~Reinstate the district service plan as required by ORC.</p>	10/22/2015 1:18 PM

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377	The way districts and buildings are evaluated on the local report cards needs to be reevaluated on how the districts and buildings are getting graded. Students that are in buildings and not receiving gifted services by qualified gifted teachers are still being included in the assessments and value-added growth measures. Currently, 7th and 8th graders are also included in the state report card and are not serviced in our district with a gifted licensed teacher.	10/22/2015 1:10 PM
378	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	10/22/2015 1:09 PM
379	Distribute to parents? How? District choice? Why include service in an indicator when service is not mandatory? If the state is willing to fund service then hold accountable, otherwise, leave off service when looking at accountability	10/22/2015 12:45 PM
380	Specify how many teachers who are servicing gifted are actually certified to do so.	10/22/2015 12:27 PM
381	The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. Suggestions: *Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. *Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. *Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. *Reinstate the district service plan as required by ORC.	10/22/2015 12:26 PM
382	This meets several of my previously stated concerns. I would offer that it be explicitly stated that ALL parents are provided the information about gifted education in multiple formats parent meetings, included on school websites, and by handouts or provided by PTO etc. I could see districts reading this and saying well we give it to them when it asks. I don't believe it explicitly states to ALL parents of enrolled students but rather simply says parents. Curious if the same rules apply to charter and online schools?	10/22/2015 12:10 PM
383	I think it is a joke that an understaffed Department of Education is going to handle more paperwork and understaffed school districts will have more paper work and hoops to jump through!	10/22/2015 12:04 PM
384	The current regulations and standards are much clearer and more objective relative to accountability. Why are you replacing them with something so nebulous and vague? I would suggest that you review and incorporate the current standards into your new plan (if replacing the current standards is even necessary).	10/22/2015 11:58 AM
385	It becomes a difficult to show progress for gifted students when their Value Add NCE is 97, 98, or 99. It is my understanding these students will always be viewed as meeting their expectation year after year (assuming they receive the same range of scores) and the final calculation for the staff member will be Average and the letter grade of a C on the report card indicator. Since the NCE is capped at 99 the annual district report card rating is a hard sell to a community if the final grade is usually a C.	10/22/2015 11:43 AM
386	1.Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	10/22/2015 11:42 AM

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387	With the small amount of time in the gifted resource room and the different focus of assignments of gifted specialists and classroom teachers, the gifted specialists should not be held accountable for how well the students score in the regular classroom.	10/22/2015 11:25 AM
388	Each district should be accountable to having a certain number of GIS's per student served.	10/22/2015 10:54 AM
389	Offer an alternative for value added. Our district is not using it this year. Don't forget that the highest students do not always show a "years" growth according to value added but we know they have grown.	10/22/2015 10:38 AM
390	Annual plan and report requirements are quite vague. Requires detail for operational expectations that are practical and achievable. Indicators on annual "report card" are dynamically incomplete...too many inherent problems with the methodology and intent of large scale assessment to provide useful evaluative information to the quality of actual gifted services implemented. As written, the indicator information might be "essential" but it should not be that way.	10/22/2015 10:21 AM
391	Are we truly holding all of our teachers to the same standards to which we are holding teachers of the gifted?	10/22/2015 10:19 AM
392	The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-compliant districts. There are no provisions to allow ODE to reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies' statutory duty to perform gifted audits. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources.	10/22/2015 10:00 AM
393	Recommendations: Reinstate ODE audits and allow ODE to remove funds of non-compliance from current standards as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. The gifted performance indicator should be incorporated into an annual report outlining the conditions of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in the current operating standards in the service section. Incorporate waivers on the basis of performance on multiple measures including gifted performance indicator. Reinstate the district plan as required by ORC,	10/22/2015 9:41 AM
394	None	10/22/2015 9:29 AM
395	Need clarification on providing parents with identification and service information. What does it mean that a district should distribute the approved list to parents? Does that mean, as in our situation, that we need to provide an approved identification and service plan to all parents. I can see that this could just be a type of "fulfill the mandate." It would be put in a handbook or put on the website and the district would say, "I did it." If the information had to be manually passed out to all parents, it would be a waste of paper. We have quite a few parents who really don't read. Also at least 90% would read the title and would toss it. At this time we are having our psychologist test our students for admission to the program. The last, at least 10 students who had scored at least 95% on the NWEA (MAP) test, he has not qualified. Therefore, our numbers in our K-5 building are getting low, especially at some grades. How is that going to affect the grade on the report card for the district and the school especially since you have to have a minimum number to get a rating? Does that mean even though we test, identify and service according to the guidelines, we wouldn't get a score? That looks like we are doing nothing!	10/22/2015 9:24 AM
396	I'm sure there are some districts out there without curriculum directors or adequate knowledge of sources for testing. I'd include the name of tests available so they know their options, as well as for districts who may be in the market for a different assessment for their students.	10/22/2015 9:04 AM
397	Reinstate provisions that require ODE audits and allow for removal of funds for non-compliance incorporate data collection on specific inputs to determine effect of services gifted performance indicator should be included in an annual report outlining condition of gifted ed without limiting the indicator to current elements reinstate service/staffing requirements in current standards and incorporate waivers on basis of multiple measures reinstate district service plan as required by ORC	10/22/2015 8:29 AM
398	If a district serves, they should be required to have at least one GIS on staff or through the ESC.	10/22/2015 8:00 AM
399	Prior to the beginning of each school year, the district shall distribute its approved identification and service plan to parents: What does this mean? A letter to every family? A post on the website? Districts and buildings will be evaluated on local report cards by an indicator. The indicator shall reflect the level of service provided by districts, the performance of gifted students on state assessments, and the value-added growth measure for students: slippery slope to allow services from non-credentialed educators while districts feel pressure to show increase in services in order to secure a good grade on the report card. I can foresee "services" that are not quality, but quantity. The district shall prepare an annual report on the number of students screened, the number of students assessed, and the number identified as gifted in each category. The report shall be submitted to the department by July fifteenth of each year: what are required? reading, math, social studies, and science? what about performing and fine arts?	10/21/2015 9:52 PM
400	use more than the 1 method of standardize testing when identifying	10/21/2015 9:38 PM
401	There should be a statement about how and when the department will publicize the data reported by the districts.	10/21/2015 9:34 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

402	The rule does not clearly indicate what the components of the gifted indicator will be or how it will be used.	10/21/2015 9:04 PM
403	Education should not be a numbers game to obtain more dollars!	10/21/2015 8:52 PM
404	There are no detailed or clear expectations for identification or services. The current standards provide detailed descriptions of the different types of services districts can choose from, but the proposed standards completely eliminate these details. The minute requirements, student caseload limits and service structure are invaluable to ensuring equity in gifted services across schools and school districts.	10/21/2015 7:50 PM
405	Reinstate definitions of service to ensure effectiveness of service can be determined. Reinstate the staffing requirements and district service plan.	10/21/2015 7:46 PM
406	There need to be audits of gifted programs and the state needs to remove funding for districts that aren't serving gifted students appropriately.	10/21/2015 7:30 PM
407	Sounds like more tests and useless meetings. More confusion and chaos for the classrooms and for the poor unsuspecting students. Again no mention of the arts. Just more math, more science and more tests.	10/21/2015 7:20 PM
408	The rule makes the indicators for gifted education nearly defunct. This will not allow gifted programs to gauge their effectiveness. It also does not encourage services to be implemented properly as the importance of the gifted indicator is stripped.	10/21/2015 7:20 PM
409	Reinstate service and staffing requirements that are in current operating standards stated in service section.	10/21/2015 7:03 PM
410	Put an unfunded mandate on the report card - classic.	10/21/2015 6:25 PM
411	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	10/21/2015 5:41 PM
412	Teachers and districts must be accountable for not only identifying gifted students but also teaching them an appropriate curriculum	10/21/2015 5:24 PM
413	May need Special Needs staff input.	10/21/2015 5:01 PM
414	There is no set criteria for servicing gifted students in this proposed model. It won't happen.	10/21/2015 4:49 PM
415	I firmly disagree with the use of a district report card in this matter. In essence, gifted education will just become one more item to mark off on a long list of what a district does to increase its score on the report card.	10/21/2015 4:42 PM
416	Since I think the measurement aspect of this--excessive reliance on testing that is not designed to really assess such students well--is at best limited, what we have to generate an indicator is counter productive & therefore not essential.	10/21/2015 4:13 PM
417	I couldn't get back to it for further review.	10/21/2015 3:53 PM
418	There is incentive to identify early (additional input points for K-3 band), however, we are at risk of over-identifying students when screening at such a young age. This makes the other components of the gifted indicator difficult to meet.	10/21/2015 3:46 PM
419	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	10/21/2015 3:43 PM
420	I also feel that student attendance and discipline show that a student is engaged and learning - not just test scores.	10/21/2015 3:09 PM

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421	<p>For the second question, I STRONGLY disagree because the proposed rule renders much of the gifted indicator useless; therefore, there will be no true evaluation of gifted services in the proposed rule. I'm concerned that the proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule DISEMPOWERS both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. Therefore, I recommend the following: 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.</p>	10/21/2015 2:59 PM
422	<p>The requirements for submission of annual plans and reports can help set expectations but more detailed information is needed on what is actually required to be reported. Will the gifted indicator include information on certified staff or will flexibility in staffing as defined in the services section be taken into account?</p>	10/21/2015 2:23 PM
423	<p>It appears that the identification report will not be a part of the indicator score on the district level report card. This devalues identification and screening. Once again the annual district report card is simply judging them by their own set criteria, as opposed to a statewide standard criteria, in addition to the students performance results.</p>	10/21/2015 2:17 PM
424	<p>The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. 1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.</p>	10/21/2015 2:16 PM
425	<p>Need to have a process in place that will assist districts who are non-compliant. This process needs to have some type of sanction or punishment for districts that repeatedly disregard and fail gifted students. Make sure that gifted ed. services are being evaluated fairly and in a way that truly measures the progress of the district.</p>	10/21/2015 1:55 PM
426	<p>1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.</p>	10/21/2015 1:55 PM
427	<p>Districts will still be held accountable for the growth and performance of gifted students, even if gifted services are being cut. The rule does state that the indicator will reflect the level of service provided, but districts receive more value-added points the more service they provide to gifted students. Districts will still want to show that they are serving gifted students, even if classroom teachers are the ones responsible for providing that service.</p>	10/21/2015 1:45 PM

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428	<p>1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC. For a link to this input guideline, please go to: http://www.oagc.com/files/ODEInputGuidelines.10.21.15.pdf</p>	10/21/2015 1:18 PM
429	<p>Districts should not be allowed to set their own indicators for their gifted services. These should be outlined in detail in the operating standards so that minimum service minutes are being met by all the districts in the state of Ohio.</p>	10/21/2015 1:16 PM
430	<p>What accountability? Where are the audits? ODE needs to regularly audit districts to ensure compliance. If gifted funds are not being spent on gifted students, those funds should be removed. As far as the gifted indicator, performance and growth measures are great. However, with the part of the indicator that includes input points, this proposed rule will allow districts to obtain the maximum number of points without providing quality service. How? Because they can set low standards in order to claim they are providing services. If this draft passes, you need to take a serious look at the discrepancies between growth of gifted students and the level of service that a district claims.</p>	10/21/2015 1:08 PM
431	<p>1. Regarding the second statement: Since the proposed rule renders much of the gifted indicator useless, there will be no true evaluation of gifted services in the proposed rule. 2. The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. 3. In addition, there are no provisions to allow ODE to reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. 4. The proposed rule sharply limits the output gifted measures with which we can hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources. Based on my intricate involvement in gifted education, I recommend: 1. Reinstatement of provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporation of data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstatement of service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, you need to include language from the ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstatement of the district service plan as required by ORC.</p>	10/21/2015 1:05 PM
432	<p>The gifted indicator, if based upon one high stakes test may not provide an evaluation of program effectiveness.</p>	10/21/2015 12:51 PM
433	<p>Since the Self Report started being required, I have never, ever (nor has anybody I know) seen a digest or analysis of the results. Again, a bunch of paperwork for what end? The new paperwork for the gifted indicator is unnecessarily complicated....again, how does this help us deliver better services and does it REALLY improve accountability, or does it keep people at the ODE eligible for a paycheck?</p>	10/21/2015 12:40 PM
434	<p>The proposed standards do not support or promote the gifted indicator. We need to have district service plans that clearly show what a district is doing for its gifted population and the gifted service plans need to align with the gifted indicator.</p>	10/21/2015 12:37 PM
435	<p>Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.</p>	10/21/2015 12:34 PM
436	<p>One requirement is that parents receive this information; however, this is not being done currently.</p>	10/21/2015 12:24 PM

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437	<p>1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.</p>	10/21/2015 11:48 AM
438	<p>This still does not guarantee that a gifted child will receive services. And we need to hold districts accountable for if these gifted children are excelling, being challenged.</p>	10/21/2015 11:43 AM
439	<p>. 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits (without the sunset provisions) from the draft of the gifted operating standards approved by the State Board of Education Achievement Committee (11.11.13 draft). 2. Reinstate and improve service and instructional settings as provided in the current standards and adjusted to some extent in the 11.11.13 draft. 3. Remove the provision that untrained general education teachers provide service unless it is an accelerated classroom as outlined in the 11.11.13 draft. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC). 6. Reinstate instruction time requirement for teachers from current standards. 7. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 8. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 9. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 10. Revise whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that is required in ORC and which exists in the current operating standards. 11. With the reinstatement of service parameters as described above, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 12. Reinstate the district service plan as required by ORC. 13. Reinstate identification and service definitions as outlined in current operating standards 3301-51-15 and adjusted to some extent in the 11.11.13 draft.</p>	10/21/2015 11:36 AM
440	<p>If districts are given free reign to determine what gifted service looks like and who provides the service, it will be much easier to rack up points on the gifted indicator part of the report card. The "rule" needs to be more similar to the previous rule~ at least in defining the services and who provides them.</p>	10/21/2015 11:19 AM
441	N/A	10/21/2015 10:50 AM
442	none	10/21/2015 10:44 AM
443	How would this "local report card" be provided to the public?	10/21/2015 10:40 AM
444	<p>Because of the way the gifted indicator is designed, more input points are awarded in the K-3 band. This encourages more identification in the primary grades, but we run the risk of over-identifying young students. The test accuracy with young students is not always reliable. And because of the increase in points at the primary grades, a district is penalized if they do not meet the value-added targets.</p>	10/21/2015 10:40 AM
445	Please make sure the state can give additional funding for potential staff increases.	10/21/2015 10:37 AM
446	<p>In my opinion, the gifted indicator is so complicated, convoluted, and difficult to understand, it is of NO VALUE and has very little connection to the quality of services offered by a district. I have yet to hear anyone explain in a clear and concise manner what the indicator is actually measuring and how that informs meaningful improvements in services for gifted children.</p>	10/21/2015 10:34 AM
447	<p>1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.</p>	10/21/2015 10:12 AM

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448	Do the plans need to be "given" to parents annually, or do they need to be made available to them...for example, on line and avialable in the school office?	10/21/2015 9:51 AM
449	There needs to be something added here where gifted students can "opt out" of service and districts are not penalized for a drop in gifted students/ parents who choose "not" to have service and then that student or group of students does not affect the school or districts "gifted" score.	10/21/2015 9:08 AM
450	If there isn't any funding provided for Gifted, how can districts be held responsible on the report card?	10/21/2015 8:15 AM
451	If the state funds - fully - gifted programs in public schools, these accountability expectations are fine.	10/21/2015 8:14 AM
452	What is the ODE doing to address the issue of assessments in which gifted students reach a ceiling? Is the ODE directly surveying teachers to determine if the district is actually delivering what its plan spells out in terms of professional development and needed resources?	10/21/2015 8:00 AM
453	No specifics as to the degree of gifted identification areas are related to the district inputs, such as superior cognitive receiving more points in the input table over creative thinking.... NEEDS TO BE MORE SPECIFIC!!!!!!!	10/20/2015 10:49 PM
454	Loss of chance for district to discuss with ODE if audited. No audit reference at all. No more audits? And no more stated right of the district to answer an audit? Can you spell out what the indicator is somewhere? This is where I, as a parent and non-teacher, might just not know, but it seems vague and I'm not seeing it in 3324.	10/20/2015 9:26 PM
455	Using state assessments and value-added measures is poor at best. State tests change from year to year and make value-added impossible, and even when the tests were the same, it was practically meaningless. Comparison of two data points hardly shows a trend, especially when previous tests had ceilings that were too low for most gifted students. A good gifted program affects a great deal more than academic achievement, and while the standards do acknowledge the social and emotional needs of gifted students, there is no measure for such things in this standard. In addition this "indicator" in past years has been so confusing to the community that it is harmful. Districts that received a "C" were decried as "failing" by the community, when in actuality, a "C" indicated that the students made a year's worth of growth in one year, as one might expect. The system is deceptive and so much so that it should not be used as a reliable measure for the community.	10/20/2015 8:53 PM
456	Why does the district need to prepare an annual report on the number screened, assessed, and identified? Why can't the data from Progress Book be uploaded to ODE? There is a gifted screen for every student in Progress Book that shows screened, assessed, and identified for each school year. Also why is the annual report due by July 15th? Most gifted personnel are not working in the month of July. Why has the annual report changed every year for the past few years? The annual report should be a consistent report each year and should be released at the beginning of the year for districts to begin completing as the school year moves along. That way the annual report could be an on-going report and could be completed before July 15th and before staff is finished for the school year rather than waiting til July 15th to submit it.	10/20/2015 8:31 PM
457	Due to the recent use of MAP testing to determine gifted identification, the use of the indicator is inappropriate. Also, the fact that students do not have to re-qualify for gifted identification is an issue that needs to be addressed. Children change and develop in different ways. It is inappropriate to identify a student as gifted as a Kindergarten student and rely on that identification to correlate with the growth and development of that child for the next 12-13 years. A re-qualification piece needs to be a part of this process, as it is for students with special needs.	10/20/2015 8:25 PM
458	Sending the approved identification and service plans to parents before the start of the school year is an expense to districts. Typically this is posted on websites and in the offices of the buildings. Will this suffice?	10/20/2015 7:57 PM
459	NONE	10/20/2015 5:54 PM
460	Allowing districts to determine whether a teacher is qualified is not appropriate. Gifted intervention specialists should be required.	10/20/2015 5:22 PM
461	Gifted services need to be determined by professionals at the state level. Giving districts the option to determine what gifted services are will result in gifted students receiving inadequate services.	10/20/2015 4:23 PM
462	Districts and buildings will be evaluated on local report cards by an indicator. The indicator shall reflect the level of service provided by districts, the performance of gifted students on state assessments, and the value-added growth measure for students. This is flawed. This data has been and continues to be manipulated by Districts to ensure they receive a "excellent" rating on the District report card. In addition we all know the OAA's did not allow for growth for those students who were at the ceiling.	10/20/2015 4:22 PM
463	Reporting numbers on gifted identified and gifted served do not tell the real value of gifted services. If a student is clustered, they can be counted as being served, but it is not the same service as a GIS spending time with them on a regular basis. There is no way in the report card to differentiate those services.	10/20/2015 4:13 PM
464	I do not agree with value-added being used as an indicator. Value added was not made with the intent to evaluate teachers.	10/20/2015 4:09 PM

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465	Again, there is too much emphasis on testing as the criterion for evaluation.	10/20/2015 4:00 PM
466	E Accountability (5) The gifted indicator should not include the value-added measure. With assessments being changed the past few years, I am concerned how value-added can accurately be measured when comparing different state assessments. E Accountability (4) "Prior to the beginning of each school year, the district shall distribute its approved identification and services plan to parents." Would posting the plan on the school website be considered distributing to parents? Maybe change wording to say,"The district shall post its approved identification and services plan on the school website."	10/20/2015 3:53 PM
467	The one problem I've seen of "value-added" is that it is hard to measure for gifted students who are over the top anyway so they score low on value-added.	10/20/2015 3:52 PM
468	The value-added measure should not be included in the indicator. With the changes in state assessments the past several years, I am concerned about including the value-added measure in the indicator. How can the value-added measure be accurately calculated when comparing different assessments?	10/20/2015 3:40 PM
469	I disagree the gifted indicator is essential to the evaluation of the gifted program. The current indicator is based on how much progress students make each year. When students are already at the top how can they move any further? If the logic behind the indicator is changed, then maybe use it. If student's ranking remain the same (90%+) then give them an 'a' ranking. Don't give them a 'c' because the kids hovering around 95% nationally are still 95%. That is an great score! Don't judge them negatively just because they didn't move up a percentage or two. With the emphasis on gifted identification across the country, you'll notice a lot more schools in this scenario.	10/20/2015 3:38 PM
470	does not mention compliance or sanctions for accountability	10/20/2015 3:00 PM
471	Sounds like more time being spent on paperwork and reports than necessary and time pulled away form serving kids.	10/20/2015 2:52 PM
472	Giving gifted students the same tests all students are given and expecting them to show equal growth is absurd. If a student comes in to 7th grade reading at a 12+ level, he or she is not going to show adequate growth on a standard 7th grade test.	10/20/2015 2:41 PM
473	How levels of gifted service is measure is not clearly defined. The current gifted inputs will be impossible for districts to meet who (1) do not have a high percentage of gifted students, even though extensive is being done, therefore, cannot earn points for the percentage of students identified or (2) have a high percentage of gifted students (30-50%) who cannot serve a high percentage of them, therefore, cannot earn points for the percentage of gifted students receiving services. A new benchmark for the number of gifted input points should be set.	10/20/2015 2:26 PM
474	Without standardized definitions of services, service settings, and trained personnel, no accurate evaluation of services can be made. Additionally, with the removal of all language around ODE audits and compliance, there is no accountability for districts. While ORC does outline the requirement for ODE to conduct on-site audits every three years for districts, these audits have not happened at all in the last two years. Removing this language from the proposed rule sends the message that accountability and compliance are unimportant, particularly in regards to spending of state funds and providing true services that best meet the needs of gifted students in our state.	10/20/2015 2:10 PM
475	Again, do not assume all administrators understand that the fine arts are included as part of this idea. Spell this out clearly and often in this document.	10/20/2015 2:07 PM
476	Data can be easily manipulated to look like the students are being served!	10/20/2015 2:07 PM
477	There are issues within the gifted indicator. It is an unfunded mandate - "the indicator shall reflect the level of service provided by districts" - how can a district be "graded" on service when it is not required? This document either should require service & provide funding OR look to dismantle the gifted indicator.	10/20/2015 2:02 PM
478	The report should document what percent of students identified as gifted are actually served, and the method used for serving them.	10/20/2015 1:53 PM
479	No.	10/20/2015 1:43 PM
480	What does "distributed to parents", mean? Hard copy? Website? Email? This needs to be specific.	10/20/2015 1:42 PM
481	The rule calls for the submission of a plan, but does not necessarily speak to a specific standard that must be met by each district in the development and implementation of said plan.	10/20/2015 1:24 PM
482	The state of Ohio needs to require more accountability from the school districts about gifted identification and services.	10/20/2015 12:45 PM
483	The gifted value added report includes all students within the district that are identified, not just those that are served. Therefore, it is a misrepresentation of the gifted students growth.	10/20/2015 12:44 PM
484	The formula makes districts write WEPS for kids that don't need them, just so we can get credit on the report card (i.e. AP high school students). Very bad system to hold us accountable since there is not trust.	10/20/2015 12:35 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

485	I do not agree with the gifted indicator on the report card. The state puts many rules in place, but then does not make sure funding for all schools in Ohio are equitable. Rich districts have more resources than districts without industry, etc..	10/20/2015 12:31 PM
486	More, more, more. That's what I see when I read this proposed rule. It will require MORE testing, MORE time away from instruction, and MORE expectation from the MORE students who will be identified as gifted. However, where is MORE money to support cost of additional testing? Where is the MORE money to be able to compensate teachers for an extended school day since we are loosing more time to testing? Where is MORE money to hire additional gifted teachers and provide additional gifted services? Where are MORE gifted teachers? Do policy makers not know there is a shortage of gifted teachers, especially in rural settings? Having to hire gifted teacher for this year, there were only two candidates; both from North Carolina. They, then backed out because of our location. We recruited one of our ELA teachers with an interest to work under a Supplemental License. Policy makers keep bowing to gifted advocates and fail to realize the majority of the schools in this state do not have the resources to support the change initiative.	10/20/2015 12:24 PM
487	It is not equitable to hold districts accountable for the number of students identified. With cut scores rising, it is more and more difficult for districts to increase the number of identified students. Yes, require two screening windows. Yes, require whole grade screening allowing for students with special needs of all types, but beyond that, districts cannot be held responsible for the students meeting identification criteria.	10/20/2015 12:20 PM
488	Why aren't there qualifications for school districts in regards to gifted coordinators and gifted intervention specialist.???.	10/20/2015 12:20 PM
489	How are you going to show growth for students who "top out" of standardized tests. Many students "top out" by third or fourth grade and then they don't show growth for the remainder of their school career. It's not that they aren't growing, its that they have gone as high as they can go on a given test.	10/20/2015 12:14 PM
490	Remove this from district report cards. Decisions regarding service model and to a large extent identification is controlled at the district level. Frequently, building level administrators have little to no authority to alter the service model dictated by the district. Also, this creates a system in which gifted population parents try to shop their kids to specific schools within a larger system resulting in schools of "haves" and "have nots" resulting in a less diverse and inclusive environment. Such a move by a district to segregate students with disabilities would result in law suits but the concept of doing this with high achieving student is accepted. Since the decisions are district level decisions, leaving the grade on the district report card is justifiable.	10/20/2015 12:03 PM
491	WE don't have enough kids to get an accurate report.	10/20/2015 11:58 AM
492	I think a data collection tool is needed that will be easily transferred into the student systems (such as DASL)	10/20/2015 11:58 AM
493	If testing requirements don't let students out of grade level, and districts apply state low ceilings the outcome for students isn't improved.	10/20/2015 11:56 AM
494	The gifted indicator will become more of a numbers game without the standards indicating service time, service options and qualified staff to deliver the service. 2008 Operating Standards were not that bad.	10/20/2015 11:55 AM
495	There are no clear expectations about reporting services for gifted students. The only thing mentioned in the statement below is about identification. "The district shall prepare an annual report on the number of students screened, the number of students assessed, and the number identified as gifted in each category. The report shall be submitted to the department by July fifteenth of each year."	10/20/2015 11:43 AM
496	This survey does not ask what educators think. . this survey asks if respondents are able to read and clarify what is written. How about allowing districts to create these rules themselves? How about providing adequate funding for gifted services?	10/20/2015 11:39 AM
497	The Dept. does not recognize services unless all students are on a WEP.	10/20/2015 11:38 AM
498	The gifted indicator just makes districts play a game to get points. Value added does not belong in gifted. These kids ceiling out and districts are penalized for it.	10/20/2015 11:36 AM
499	I think enforcement of such proposed accountability standards is more important than perfecting the standards themselves. From my personal experience, accountability is not currently met on an individual basis, and thus the rules on this are a moot issue at this time. Personally, I would rather the new proposed standard replace the current (even though they are inferior) if simplifying them would lead to their successful enforcement.	10/20/2015 11:27 AM
500	The indicator is a step in the right direction toward districts realizing that this group needs accounted for, however the state does not do a good job at making sure this population actually gets the services needed for their maximum growth. (See all previous answers)	10/20/2015 11:24 AM
501	No	10/20/2015 11:07 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

502	The indicator will be useless under this "rule". Districts will count anything as service to help the indicator and Coordinators will be pressured by administrators to submit counts that they know aren't true services. How are districts to distribute plans to parents prior to the school year? Is that all parents in the district or just parents of identified students? Why do they need a copy every year? Does this mean I have to copy and mail 1000 copies of a 6 page booklet to all parents every year before school starts? That's a huge expense and waste of time and resources.	10/20/2015 11:04 AM
503	Value Added should be multiple measures, but not multiple years.	10/20/2015 11:00 AM
504	Without mandating services, I fail to see how districts can be held to meet a report card indicator that is built around servicing gifted kids. As long as funding is not available or service is not required, districts will continue to do the minimal for gifted boys and girls. We strongly disagree to this accountability piece unless gifted service becomes fully funded and required within the state of Ohio.	10/20/2015 10:59 AM
505	The Department has been high on accountability and low on funding as it relates to GT services.	10/20/2015 10:59 AM
506	Annual reporting should also include: *breakdown of the gender, ethnic background, and socio-economic status of those ID'd according to state rules, and those served by the district. *acceleration data (how many kids assessed, how many kids accelerated, and gender/ethnic/socio-economic status of those assessed vs accelerated) *Outcomes over an above grade-level testing on state standards: How many gifted music students are participating in the all-state orchestra or band? How many students are national merit scholars? What percentage of AP tests are passed? District report card: (1) The current approach does not show the district how well it does with its services as children's performance is not broken out according to ODE-gifted criteria vs the district services criteria. That is, when a district is debating the efficacy of a service and point to the report card score as evidence, the report card includes the performance of kids across a wide variety of experiences, and does not actually assess the quality of the service. Better: provide a score for "gifted and served" and a score for "gifted but not served." The results will expose the lack of real, regular differentiated instruction *and* curriculum in the general education classroom. (2) The value added data are based on testing of grade level state standards. The ability to determine whether a gifted child, ready to learn above grade level material, is actually being taught at their readiness level.	10/20/2015 10:58 AM
507	It seems as if there is also a need to report on services provided, not just on number of students assessed and identified. If a child is brining in extra funds to a school because s/he is gifted, the residence of that district should know how that money was spent.	10/20/2015 10:51 AM
508	Not an effective way to evaluate a program	10/20/2015 10:41 AM
509	why create a report when all this is reported to EMIS already. This seems like doing double the work. Does the state not look at their own requirements in EMIS.	10/20/2015 10:41 AM
510	I would revise the portion stating "Prior to the beginning of each school year" notification element to something in the first grading period.	10/20/2015 10:39 AM
511	That stupid color-coded chart needs to go away. It's worthless.	10/20/2015 10:36 AM
512	Measuring gifted student growth on grade level assessments does not provide enough of a ceiling for these learners. I have conducted research comparing on grade level and above grade level assessments where the on grade level shows either little, no, or backward trends and the above grade level shows incredible growth. If the curriculum is differentiated for these learners, the assessment also needs to be differentiated appropriately.	10/20/2015 10:21 AM
513	When you are identifying students as gifted by "screening" them, it creates false test results that hurt districts. Many of these kids that are identified as gifted are not truly gifted.	10/20/2015 10:21 AM
514	Gifted indicator is a key to administration paying attention to gifted services. However, what it takes to meet that indicator is very unclear. No one at our ESC can answer that question and no superintendents or principals know how to meet the indicator either.	10/20/2015 10:16 AM
515	Very little guidance is offered here. How does the district have to provide information to parents?	10/20/2015 10:09 AM
516	Input points are moving up too quickly for districts to rise to the requirements when we do not have funding. o	10/20/2015 9:44 AM
517	More specific requirements. How it is currently written is too vague and general. The gifted indicator is a valuable tool but it cannot be the only accountability measure.	10/20/2015 9:38 AM
518	No.	10/20/2015 9:33 AM
519	There is still some confusion regarding the purpose of the gifted indicator and what how it is determined.	10/20/2015 9:32 AM
520	Districts should have to submit the exact services gifted students receive on a daily basis just as IEPs require for special education students. This plan does not actually require districts to state and follow through with any individual plan for each gifted student and there is no accountability for providing those services to each identified student and family	10/20/2015 9:28 AM
521	None...other than to give guidance on the type of reporting required.	10/20/2015 9:26 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

522	The self-report should align with whatever the new standards are. It's important that the information on the self report reflect the requirements that the districts have after the new standards are passed.	10/20/2015 9:24 AM
523	Would be helpful for districts to receive reports from the department for option 5 and 6 datasets in advance of the data being used and publicized. Said data is part of the yearend student EMIS manifest that is collected in May and June so department could share gifted report data (criteria error checks and data patterns) to be verified for accuracy by district staff in advance.	10/20/2015 9:18 AM
524	Not all districts have year round employees; A July due date makes that assumption.	10/20/2015 9:14 AM
525	Many social, emotional, or valuable lessons can't be measured. Quality added data, such as events, offerings, and activities should be included in the report card, rather than just test score data.	10/20/2015 9:11 AM
526	Where is information specific to reporting of qualified personnel, professional development, and assistance to regular classroom teachers thus removing any meaningful data collection to analyze the effective use of resources? the process to remediate non-compliant districts, all of which is required under Ohio Revised Code? Further, the gifted indicators really seem to be a primary grade level focus. In reality, it is also more an EMIS game than anything else.	10/20/2015 9:10 AM
527	Districts and buildings will be evaluated on local report cards by an indicator. The indicator shall reflect the level of service provided by districts, the performance of gifted students on state assessments, and the value-added growth measure for students. How will the "level of service" be measured? Just because we don't have gifted units and don't accept state money for units and don't participate in an ESC gifted unit, will our district be given a lower score? Even though we do have early entrance for kindergarten, offer differentiation in the elementary, offer an after school robotics competition club for 5th - 8th graders, offer high school credit classes for our advanced 8th graders and our high school students can earn up to 40 college credits without ever leaving our high school campus?	10/20/2015 9:07 AM
528	Please make clear how "accelerated" students will count towards gifted services. Once accelerated, are they always counted as receiving gifted services? Is it only one year? What grade level are their test results reflected within -- age grade or subject acceleration grade?	10/20/2015 9:00 AM
529	I disagree that the use of the gifted indicator in the annual district report card is essential to the evaluation of gifted education services -- when you take into account the state does not fund the services at a defensible level. Remove the provision in the report if it's not going to be funded at a defensible level or keep it and fund the services better.	10/20/2015 8:57 AM
530	Finally some advocacy and recognition for gifted students! This is long overdue.	10/20/2015 8:54 AM
531	no	10/20/2015 8:53 AM
532	If the new operating standards go into effect, then the gifted indicator is going to be set upon students receiving no specialized instruction based on their giftedness. The new standards do not include specifications for service settings and staffing restrictions, so districts will claim that the students are being served in the regular classroom. Imagine if your child were gifted and in a classroom where the teacher is trying to differentiate for students on IEPs, regular developing students and students who are gifted. Who do you think that teacher is going to spend their time with the most, I can guarantee the gifted child is going to suffer.	10/20/2015 8:52 AM
533	This is directly tied to the concern I have about the lack of training for those providing what can be deemed "gifted service". If there is little to no direction from a trained GIS/Coordinator are we truly measuring quality of service or just a quantity of something that is said to be provided.	10/20/2015 8:51 AM
534	none	10/20/2015 8:51 AM
535	Drop the report card requirement	10/20/2015 8:48 AM
536	The indicator is flawed. ODE abandoned PARCC because it is flawed, right? So if the indicator is reliant on state-assessments that ODE considers flawed, then that portion of the indicator does not reflect a good evaluation of gifted services. In addition, state assessments do no measure many of the goals of gifted education, including leadership, creativity, and critical thinking.	10/20/2015 8:45 AM
537	. . . a description of the gifted services offered by the district, and an explanation of the district's gifted criteria used to determine educators are appropriately trained to provide gifted service. Does the above statement mean only state funded gifted units? Or does it include what the district does on its own, such as college credit plus offerings, high school credit in 8th gr. offerings, etc.? Because we do NOT call them gifted services - these are offerings available to eligible students.	10/20/2015 8:43 AM
538	Until gifted is actually funded there should be NO accountability grades.	10/20/2015 8:43 AM

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539	Reporting a gifted indicator totally ignores all other factors associated with educating the whole child. At the high school level, a lot has happened between when a child is identified in elementary school and when they arrive at the high school. In many cases, families have split, kids have begun using drugs, and other factors have created gaps in their education. Regardless of the fact that they are gifted, these learning gaps make a placement in an advanced class inappropriate simply because the foundation is no longer there despite their giftedness. I also wonder how in a time of fiscal belt-tightening, we continue to have the manpower, both at the local and state level, to oversee these additional required services. Every state initiative over the last two to three years has been a train wreck because there just isn't the man power to dedicate to them. It is a rare day that one can receive a timely response from ODE on any given issue these days. This is not to be critical of ODE; they are simply overwhelmed and understaffed like all of us.	10/20/2015 8:36 AM
540	Expectations are clear, but the rules fly in the face of sound educational research. It is dumb that you get points based on identifying an absurd amount of students. 15% of your population has to be identified to get the full allotment when 2-5% of your population should truly be identified. That is just dumb.	10/20/2015 8:35 AM
541	Controversy and confusion, regarding state assessments and value added scores, diminishes their value in evaluating program, level of service, and individual or group achievement and progress.	10/20/2015 8:34 AM
542	Change the language from Districts Shall distribute information to parents: all parents, not a select group to Districts are REQUIRED to distribute information to parents. And set a date upon which the Districts are required to distribute this information.	10/20/2015 8:32 AM
543	What about audits? How will you ensure districts are complying? Or will we just look at the indicator and assume those scoring highly are doing gifted right?	10/20/2015 8:31 AM
544	The grade card piece is terrible and needs completely rethought. This is another unfunded mandate! Odd that inputs don't matter in overall funding formula, but school's grade card score to be determined in large part by local inputs...	10/20/2015 8:24 AM
545	More red tape to make you feel good about the illusion of transparency.	10/20/2015 8:22 AM
546	If you do not use the properly educated gifted teachers, you will not "move" gifted kids. If this plan goes through, my words will bear out in the reporting.	10/20/2015 8:12 AM
547	No	10/20/2015 8:11 AM
548	The gifted indicator has issues in determining input points that require districts to "play the game" -- which is not always the same as serving gifted kids well.	10/20/2015 8:10 AM
549	Confused on the components of the gifted indicator.	10/20/2015 8:06 AM
550	NA	10/20/2015 8:05 AM
551	It's a blank sheet of paper. We are going to identify and teach gifted students. There - that's my plan. I have met the requirements of your rules. Is that really what you want?	10/20/2015 8:04 AM
552	Meeting all of the requirements presents challenges for small districts who have limited gifted personnel.	10/20/2015 8:01 AM
553	No	10/20/2015 7:58 AM
554	"Prior to the beginning of each school year, the district shall distribute its approved identification and service plan to parents." Our district does most of this through our website now. I think it needs to be clear that posting this information on our website is acceptable. Printing thousands of handbooks or documents is costly and wasteful. The report card is getting way to complicated and becoming useless to the community. We need to cut the indicators down to about 5 global indicators for them to be an effective communication tool for the community.	10/20/2015 7:57 AM
555	Districts need to be more transparent with what they are actually doing.	10/20/2015 7:56 AM
556	The report should include how teachers are qualified (i.e. gifted license, gifted endorsement).	10/20/2015 7:56 AM
557	What is meant by "the district shall distribute its approved identification and service plan to parents"? Better terminology would be "the district shall make available its approved identification and service plan to parents through either the distribution of the plan or the publication of the plan on its public website." The practical implementation of the distribution will be to include the plan in the start of school packet when parents are already inundated with information. The parents need this information when at the time their student is identified or when they want their child screened, which is usually at some point after the start of the school year. Sending more paper home to parents is not necessarily the best way to inform the parents of the school's plan.	10/20/2015 7:50 AM

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558	This is a house of cards built on quicksand. Given that the previous sections have removed all requirements for quality and fiscal accountability, this reporting requirement is simply a woefully dishonest attempt to make a horrible system look accountable. Given that districts get credit on the gifted indicator for "inputs" and the definition of inputs is excessively broad, the indicator is not a valid or reliable measure of quality services. Given that the output measures are questionable at best (three different testing methods in three years, where results are simply statistically not comparable, you can't measure apples and oranges and pretend that you can compare results), then the gifted indicator becomes a cruel farce. Giving it official stature and weight does not eliminate the fact that it is not a valid or reliable measure.	10/20/2015 7:37 AM
559	The amount of funding does not have a clear connection to outcomes. Informing parents of identification procedures before the beginning of the school year will be difficult. Information can be given within the first four weeks or at the time of testing more easily.	10/20/2015 7:37 AM
560	Looking at all the grades in the state with the gifted indicator, the grades were very low. It looks as if you play the game, your grade came out better (like little identification of students so grade card score was better than a school who tried to follow the rules and test students for identification.) Also, the schools who had low percentage had very little service and faired better on the grade. So, if a school doesn't identify and have all the testing, the grade is better. You just rewarded "not to test."	10/20/2015 7:37 AM
561	Does the rule require that all parents receive information about gifted services or only parents of gifted students?	10/20/2015 7:30 AM
562	I don't like the value added component.	10/20/2015 7:19 AM
563	If these services are delegated to the Local level, how will the state evaluate the effectiveness of the program when comparing school by school? The state's evaluation criteria needs to be clear and published prior to asking schools for plans or putting them into a position of evaluation. Is the state collecting data to understand the need for gifted OR using the data to rate schools? I believe the first use of data is appropriate for state; however, if delegation is ultimately to local level- they should not be micromanaging by the latter.	10/20/2015 6:57 AM
564	How can you hold districts accountable for gifted services when you don't highlight any specific time frame or number of students these programs are handling. Can one person really be accountable for 180 students fairly and effectively? Can one person really be accountable for 30 students identified as gifted in one classroom?	10/20/2015 6:53 AM
565	This is a huge additional burden for districts that will be unwieldy and expensive and weaken the ability of the districts to educate	10/20/2015 4:50 AM
566	The ID process for gifted students is a joke	10/20/2015 12:20 AM
567	Again, it clearly lets the districts develop whatever plan they want to "serve" gifted students. There is no minimum requirements, no set requirements for identification, no uniformity, and essentially no oversight whatsoever. Districts can set whatever criteria they way, and ODE can make its own completely unguided determination on what the districts do. So there are two levels of lack of oversight and guidance. The opportunity for politics and money and other things that are unrelated to quality gifted education to affect the situation are doubled. Additionally, performance on a state mandated test is not an adequate indicator of giftedness, especially if there is no uniform definition of what gifted services are, or even who gifted students are across the state. You are attempting to regulate an outcome, with absolutely no regulations of the income. The old saying "garbage in, garbage out" applies - and there is essentially nothing to prevent "garbage" from going into this system.	10/19/2015 11:15 PM
568	I would be concerned about using the performance of gifted students on state testing as part of the indicator. Many gifted students also have special learning needs and unfortunately many are still not getting served properly (IDEA and 504 plans), thus no accommodations are made during testing and results are not accurate. Standardized tests should not be relied on.	10/19/2015 10:55 PM
569	A requirement that districts be required to report the amount of gifted services provided must be added. Gifted students ability test scores are as far from the mean as children in Special Education and schools need to be held account for providing specialized instruction to this population of at risk population of students.	10/19/2015 10:16 PM
570	Who is to evaluate? And what is the consequences if the program does not follow the state's/district's guidelines?	10/19/2015 10:04 PM
571	Find a more effective way to evaluate gifted children and programs. State testing does not accurately assess gifted children.	10/19/2015 9:49 PM
572	What is the rationale for posting the number of screened, assessed, etc.? Is the focus on quantity over quality where gifted assessment and service is concerned?	10/19/2015 9:46 PM
573	4) Prior to the beginning of the school year the district shall POST (not distribute which implies passing out paper) or make accessible on the district website the identification and service plans to parents 5) get rid of the value - added component until more reseach is done showing that it does have a high degree of validity/reliability	10/19/2015 9:44 PM
574	The number of gifted students served in their area(s) of talent should also be reported	10/19/2015 9:44 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

575	We need more accountability from ODE and our districts. We need to know that ODE will audit districts and what will be the process to remediate non-compliant districts.	10/19/2015 9:29 PM
576	No	10/19/2015 9:19 PM
577	No I do not have any specific changes for the proposed rules related to accountability	10/19/2015 9:19 PM
578	I am concerned about the value added component of the gifted indicator. My experience is that students at the top of the academic achievement scale tend to "regress toward the mean". Equally troubling is the ceiling of the tests that do not always allow students to demonstrate a years growth even when that growth in the classroom is obvious!!!!	10/19/2015 9:15 PM
579	More bureaucracy! We will spent more time on paperwork then service. Not the right direction.	10/19/2015 9:07 PM
580	This approach seems to rely heavily on the report card indicator as the motivator for districts to properly support and fund gifted child education. I'm not sure that truly has the power necessary. By saying districts can have staff that meet district-determined criteria providing services, anything more in programming and services is now reliant on the degree and level at which a district invests itself in providing an appropriately challenging and meaningful program for gifted children. Because that is so unclear, anything relying on that is also unclear.	10/19/2015 9:03 PM
581	I believe this entire process is far more in depth and labor intensive than necessary. This is too large if an indicator on the grade card ad requires too much of district resources that should be allocated to more needy student issues.	10/19/2015 9:02 PM
582	The report card is not the place to report progress of gifted students.	10/19/2015 9:00 PM
583	We have been reporting yearly for some time which hasn't been easy when we don't get the report until June! Using the gifted indicator to rank how schools serve their gifted population is a joke. Schools with small populations don't have a chance of meeting the points.	10/19/2015 8:58 PM
584	not really	10/19/2015 8:49 PM
585	There is no criteria to report service! The only criteria is to identify and screen, where is service? The state assessments keep changing, how will value added be determined with late test results and assessments that keep changing?	10/19/2015 8:34 PM
586	Points should not be based on race. Certain districts that are rural are at a disadvantage as they don't have a large number of minorities and can't earn the needed increase in points.	10/19/2015 8:30 PM
587	This item # 5 below is futile when students start taking compacted customized courses that are accelerated courses and EOC exams instead of the general courses / tests...it won't be possible to compare growth or know the value-added once they jump from one type of test to another that isn't the norm. Example, we have students sitting in 6th grade accelerated course that take the general 6th grade math test and then the following year will be sitting in Algebra and take the Algebra End of Course exam. So our general tests plummet when pull the gifted students out to place in more rigorous courses and since they are with their same age peers (one or two sections of students sometimes) -- they are not considered accelerated for single subject, but instead the curriculum is compacted and rigor brought to the students. Times are changing and I'm sure the data is getting skewed and not painting an accurate picture on the report card to be fair to districts. This item is futile (outdated) in what you use to base your calculations on or how calculate for an indicator: Districts and buildings will be evaluated on local report cards by an indicator. The indicator shall reflect the level of service provided by districts, the performance of gifted students on state assessments, and the value-added growth measure for students.	10/19/2015 8:23 PM

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588	<p>Reinstate language allowing for audits and sanctions: On a personal level, I have watched as children I love dearly have not been properly assessed for giftedness nor identified despite qualifying gifted tests scores in one Ohio district. Despite this district having an EMIS report that clearly shows statistically unlikely identification rates (the district in question reported 0 identified students across 5 grade levels despite screening nearly 1500 children in those grades), an audit was never completed by ODE. And that was with me bringing this anomaly to the attention of staff. How many children in that district were not properly identified as gifted, as required by law, and, therefore, did not get access to needed academic services? My district is the prime example of the role an audit can play in generating positive changes in the services provided for students. From attendance practices to special education services to ESL services, Columbus has been reviewed for their compliance with state rules and has improved numerous practices because of corrective action plans. The last audit of Columbus' gifted services was in 2010, more than five years ago, despite current law stating it should occur every three years. While I am not asking for the additional work that comes with an audit, I can say that the potential for an audit brings about compliance. Again, while implementing gifted services in a district that largely supports such programming, the argument that I sometimes must rely on to get building level leaders or classroom staff to follow through on best practices consistently and to ensure equitable access to services is the reminder that an audit is overdue and possible. I fully intend for my district to be 100% compliant, and the notion of someone coming in to check for that compliance helps me get others on board, as well. If I am doing things the way I should, I have nothing to hide and no worry about sanctions. There should be no reason to remove this provision from the operating standards, especially since law requires it. Include state reporting on data related to gifted measures and leave the language more open regarding the components of the gifted indicator: If the focus is truly on moving to an outputs-based system, then there must be a mechanism to comprehensively report on those outputs and to review the output measure for its appropriateness. All stakeholders in the 2014 Gifted Indicator Work Group commissioned by the state board of education and led by ODE were led to believe the indicator would be reviewed and revised as needed once the PARCC assessments were fully implemented and consortium-derived cut scores were evaluated for their appropriateness for measuring the achievement of gifted learners. The removal of PARCC assessments and the Ohio-set cut scores further emphasizes the need to revisit the indicator and have flexibility to modify it, if needed. Language needs to be more broad to allow for this work and needs to include a requirement that ODE fully reports data about gifted in a public manner annually to ensure transparency and accountability with the public. The gifted indicator can work - but not right now with everything in flux. We need to be able to revise and strengthen it as state testing evolves.</p>	10/19/2015 8:15 PM
589	<p>The gifted indicator has too much weight on points in the K-3 band.</p>	10/19/2015 8:11 PM
590	<p>Ohio holds educators accountable for identification. The report card will hold us accountable for servicing them. The state should support this service with additional funding.</p>	10/19/2015 8:10 PM
591	<p>our district's plan is buried on a website,not made readily available to parents...this should be a must</p>	10/19/2015 8:09 PM
592	<p>While the components of the indicator and the report card are listed it is not defined as to what they are.</p>	10/19/2015 7:54 PM
593	<p>More Unfunded mandates are not necessary.</p>	10/19/2015 7:32 PM
594	<p>There are many other, more reality based methods to assess gifted services. As has been seen far too clearly, state based testing is significantly flawed.</p>	10/19/2015 7:28 PM
595	<p>I believe that accountability is a very important piece when evaluating gifted services. However, I feel that the tests we use to evaluate gifted children are insufficient since many students perform at the top consistently, and we are NOT able to see their true ability levels due to the ceiling that exists on state tests. I feel that the tests are unfair for gifted children when we are analyzing their scores for value added. If students consistently perform in the top range each year, we cannot determine whether they've really had a "year's worth of growth" or not because their true abilities are not being measured. I don't feel that one score on one day during the school year should be the measure we use to determine whether gifted programs for children are successful. I feel that this is a faulty way of measuring success, and I feel that in other realms in society, we do not measure success in this way. For example, we do not assess the success of a business by looking at their sales on one day during a fiscal year. A "one day" picture of a child's performance in NO WAY shows his/her true abilities, and it is ridiculous to think that this would be an effective way to evaluate the ability of a child in addition to the success of a program for gifted children.</p>	10/19/2015 7:28 PM
596	<p>Language is too weak. The language must contain specifics of what a service is....one provided by a gifted intervention specialist that has gifted certification. I fear that many schools will say they are cluster grouping or providing a one day gifted training for teachers then claim students are receiving services. In reality nothing is happening in the classroom to differentiate curriculum for the students. Although I am now a retired gifted specialist, I have done consulting work with a district that claimed over 600 students were served all because the regular education teachers read a book about differentiating curriculum. In reality only about 50 students were really served. When I asked about why so many were listed in EMIS I was told that it helped on the grade card. I'm sure this is not the only school doing this.</p>	10/19/2015 7:13 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

597	I believe that the gifted indicator is unfair to small districts, it is too difficult for these districts to reach the number of gifted input points needed to meet the indicator. Also, districts are worried about identifying students and not serving them in a given year. Now, they are holding off on testing until the very end of the year, which poses many problems in the identification process. We are finding it difficult to help gifted students to show growth in Value-Added. Many teachers are concerned about having gifted students in their classrooms. I believe this is driving what services we are offering and this is a negative practice for students. We want to encourage teachers to work with gifted students without having fear that offering a service can impact them (the teacher) in a negative way.	10/19/2015 7:07 PM
598	No	10/19/2015 6:56 PM
599	I do not believe that the indicator on the report card is a fair way to measure the districts gifted services. Again, we are unreliably identifying students as gifted based on one measure. We should be held accountable for serving students who have been identified by a team of professionals using multiple measures.	10/19/2015 6:52 PM
600	I think you need to specify that it should be by building--the report card. Our district is sending scores back to the home schools from the gifted school because it's a program, not a school.	10/19/2015 6:38 PM
601	It is impossible to measure gifted services based on a one day test. All components of a districts gifted program should be included, not just testing scores. There is entirely too much emphasis on test scores in our classrooms. Students social and emotional needs, creative expression, socialization and product creation in gifted programs is not measured by the testing.	10/19/2015 6:38 PM
602	Are you asking if using data is important to evaluation or if the rule makes this clear?	10/19/2015 6:27 PM
603	another report to be filed?	10/19/2015 6:25 PM
604	Educators and Professionals proven to be advanced in their fields with bona fide successful experience in education or private sector training and mentoring shall be deemed appropriate as instructors for gifted intervention.	10/19/2015 6:24 PM
605	I believe in accountability. Maybe with some of the flexibility that is being proposed it may be better. My concern is with how gifted students are being reported for the report card and the current operating standards. I do not believe that general ed teachers should be writing WEPs. For that reason, we chose a model of pull out for our students so the GIS writes the plans (co-teaching cannot happen because she serves 3 buildings). The report card will not look good based on the current criteria. I have a huge concern with the things I hear from other districts (having general ed teachers write WEPs just to increase the amount of students officially "served"). Districts are "playing the game" so their report card will look good. I have huge concerns about his because nothing is truly different for the kids programming.	10/19/2015 6:06 PM
606	No changes, but I disagree with applying 'value added' growth.	10/19/2015 5:56 PM
607	It would be helpful to have more support to districts that would help to answer questions about accountability and gifted any related gifted services. When there is a turnover in staff, especially gifted coordinators, it would be helpful to know what support there is and network exists to learn more about the gifted education. At times, I wonder if we are data rich and information poor.	10/19/2015 5:50 PM
608	What about districts that cannot serve? This is another unfair practice for districts that have little or no money.	10/19/2015 5:46 PM
609	In 4), is that to all parents or just previously identified gifted student parents?	10/19/2015 5:42 PM
610	Again, unless services are better defined, we will see them cut.	10/19/2015 5:36 PM
611	Excellent ditto about CharterSchools.	10/19/2015 5:31 PM
612	Districts and buildings will be evaluated on local report cards by an indicator. The indicator shall reflect the level of service provided by districts, the performance of gifted students on state assessments, and the value-added growth measure for students. -- Gifted students do not always show strong performance on typical state assessments and the term value-added seems inadequate to measure academic growth in the form of critical thinking, project management and other tools that are more effective at motivating gifted students to advance. I have seen gifted students perform well on standardized tests, but who are unmotivated to go beyond because there is no motivation to do so. Also, related to #6 -- use caution with a "numbers" reporting as history has shown that systems learn to manipulate this form of reporting to the advantage of the district, not necessarily the students.	10/19/2015 5:30 PM
613	Require the State Department to report on service to gifted students Statewide. Make a grade card for Dr. Ross, comparing the lack of support from Ohio to other States.... We may fund our prisons well, or we may have great roads and bridges, we may spend more on charter schools than any other State, but how well do we fund our public schools and our students (gifted included) ?	10/19/2015 5:30 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

614	"Prior to the beginning of each school year, the district shall distribute its approved identification and service plan to parents." - Distribute implies that we will send a mailing home. Publish is a better word because it would include email, webpages and eNewsletters. If I were to talk to someone in my family, I would not recommend the convoluted, point system/gifted indicator as a measure of quality in a gifted program. I would look at the achievement of gifted students in the district and the depth and breadth of curriculum. I would also want a variety of extracurriculars. If our gifted students are thriving, that is our accountability.	10/19/2015 5:28 PM
615	This would provide the guidelines for a gifted program, but the skills of the gifted intervention teacher and experiences provided for identified students as well as the data documenting student growth each year.	10/19/2015 5:28 PM
616	Specify in the Standards who is eligible to provide gifted services. Otherwise, districts can say the building principal is "qualified" to provide services because he/she has an administrative license, with NO knowledge of gifted students' needs. In fact, many principals hold incorrect, even harmful, beliefs about high ability students.	10/19/2015 5:20 PM
617	The gifted indicator should assist districts on enhancing identification and service. Unfortunately, if districts can count anything as service, there will be no validity or reliability in the indicator.	10/19/2015 5:18 PM
618	Again, more bureaucracy. You see all the data on EMIS, why does someone have to write a plan too? Give us some money to actually serve kids and you would be shocked how much more service there is!!!	10/19/2015 5:15 PM
619	The indicator has not changed how my teachers teach. It has only created more paperwork.	10/19/2015 5:14 PM
620	another unfunded mandate.... who's paying for all the record keeping. bozo's.....	10/19/2015 5:10 PM
621	I believe the components specified in the proposed rules for the reports is too specific and not enough flexibility.	10/19/2015 5:10 PM
622	For small, rural districts, this indicator may really hurt a school district this size.	10/19/2015 5:07 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

Q16 Any additional comments on the proposed rule?

Answered: 632 Skipped: 2,830

#	Responses	Date
1	Surveys can be written in such a way to generate the outcomes desired by the developer, not to actually gain information, insight, or opinions of those taking the survey; this survey, as written, was composed to obtain a certain outcome - shame on all of you! Children present exceptionalism in many ways, and all deserve support and protection, including those whose gifts lie in academia. We are the only First World nation who actually represses and marginalizes our most talented students instead of supporting them. The continued oppression of Gifted can only result in the further dimming of the future light of America. Considering weakening the little protection Gifted has is nothing short of a tragedy.	11/7/2015 4:59 PM
2	Make extensive gifted services mandatory for districts to provide to all those who are identified.	11/7/2015 4:57 PM
3	Reinstate clear identification language, clear service setting, clear class size and caseload limits, instructional time guidelines and strong funding and accountability. In short, use the current rule and strengthen it, not try to dismantle gifted education in Ohio! Why would the BOE and ODE want to cheat gifted children out of an appropriate education?	11/7/2015 3:39 PM
4	I would like to see gifted service programs to be better funded and exceptional since these are likely to be our future leaders.	11/7/2015 1:51 PM
5	I would hope you would closely look at what you have written and engage in discussion with experts in the field of gifted education before continuing onward. These children deserve an appropriate education, not a one-size fits all or "they will get it on their own in the regular classroom" approach. Research has shown that often leads to problems in the future when they finally meet the wall they have not been taught how to climb. Additionally, now being challenged detrimentally influences their self-efficacy. Socially, emotionally and intellectually, these students need support and a groups of peers to help them grow. Do not deprive them of that appropriate education.	11/7/2015 1:00 PM
6	The state should consider redefining the high IQ population as "special needs" rather than "gifted" in order to allow these underserved students the resources and funding they need to be successful and thrive, rather than just survive, in the traditional school environment.	11/7/2015 12:12 PM
7	Overall, I think the proposed changes would result in gifted students receiving less, and lesser quality, services. I am appalled that ODE would think these changes would benefit students; in fact, I don't think anyone could argue that these serve children. They may serve districts, who do not receive any specific funding for serving gifted students, look better on their report card.	11/7/2015 12:09 PM
8	I feel that these changes as outline will result if fewer services for gifted students. Please strongly consider these recommendations.	11/7/2015 12:04 PM
9	The gifted student continues to be an overlooked and undervalued population. If the United States truly values education and being competitive in a global market, the state must prioritize finding and funding the potential in high IQ students who are often at risk in the traditional classroom that does not meet their needs.	11/7/2015 11:59 AM
10	I think that the gifted students should be taught by teachers that are expressly trained and certified in gifted education standards and techniques. Funding should be allocated for the gifted programs to support the extension programs that enrich and extend the gifted students education.	11/7/2015 10:00 AM
11	Beyond OAGC, intentionally seek out representation from others in the gifted community in Ohio. Reach out to school district administrators regarding needs and implementation of gifted education. Pull together qualified and experienced individuals in the area of gifted education to assess the current state of gifted education and make recommendations based on current research and effective practices in the field.	11/7/2015 9:48 AM
12	I'm assuming this rule will put in place not only identification of gifted students, but also a requirement that the district will provide services to those identified. This will negate the previous rule that they must only be identified. I may have missed that, not enough coffee yet.	11/7/2015 9:32 AM
13	It is very disappointing that the very agency charged with oversight of Ohio's education system is so uninterested in helping to ensure that gifted students receive an appropriate education. As a parent I hope that this draft rule was merely a placeholder until the real work can begin.	11/7/2015 9:27 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

14	<p>Gifted students, who have never enjoyed protections under federal law, are not served by deregulation. Gifted children are the least regulated student population in Ohio. There is no mandate to provide services to gifted children and little incentive to identify them even though identification has been required for years and is supposed to be audited by ODE. When state funding was removed from specific personnel requirements in 2009, the results for gifted students were catastrophic. The September 11th draft of the gifted operating standards does little to help gifted students, and much to ensure that districts will do even less than they already do with far greater impunity. The new standards will effectively allow districts to decide that any teacher can be a gifted teacher (I hope a revision will address this!) and that any intervention no matter how irrelevant can be sufficient! Without discussion of the merits of an inputs vs. outputs based accountability system, neither will make a difference for gifted students without quality parameters defining what services are and what level of training is appropriate for teachers to provide those services in various settings. Some regulations exist for a reason. The removal of all staffing, service and accountability provisions in the 9/11 draft will make the current poor state of gifted education in Ohio even worse. Districts will soon be legally able to say they are serving gifted children when in fact those students will receive nothing more than a piece of paper with a "served" stamp on it. Please, please, as parents of two gifted children, go back to the current rule, and work from there. These are children from across Ohio who will have the ability to lead, and help out our state. Don't take the regulation of these programs away more than they already have. Thank you!</p>	11/7/2015 9:06 AM
15	<p>We know that the Ohio Association for Gifted Children is very opposed to many provisions in the proposed rule. They are experts on gifted education; however, Ohio consistently disregards the input of experts and dis-respects the expertise of gifted coordinators and intervention specialists. Ohio desperately needs better rates of employment and higher incomes for employment - and one of the ways to ensure this is to fully educate all students to their highest potential, gifted included. I find it ironic and unacceptable that Ohio licenses barbers who cut hair of, say a gifted student, but does not require certifications for those who organize and teach a gifted program which spans 12 years and involves such a critical area as education for gifted. These students did not choose their IQ's and do not deserve to be marginalized in the way that Ohio law treats their education.</p>	11/7/2015 8:49 AM
16	<p>I hope that Ohio chooses to be proactive as to gifted funding, identification, and services. These children are not being engaged and challenged at their ability and interest levels across the state. Opportunities are not available to all gifted students. We are not casting a wider net - it seems instead that we are doing the opposite. Districts need to proactively identify and serve these children. Being proactive - a key ingredient to providing the best education that we can. We are letting our students down.</p>	11/7/2015 7:38 AM
17	<p>The proposed rule makes a mockery of gifted education in Ohio and creates an uncertain future for our brightest students. While some district educational leaders will continue to do what is best for these students, others will instead see these as a place to cut back and allow for educators unfamiliar with the unique needs of these learners to be unmet. The 2008 standards moved us forward and made those who chose to serve take a look at what a service truly met. It made the minutes of the gifted intervention specialist meaningful. The gifted indicator furthered the accountability and caused many districts to add in an area where cuts were often made. By taking away all parameters we are moving backward and showing students and parents that they do not matter and do not deserve to grow and learn as other populations do. I sincerely hope that the State Board and Department of Education will reconsider allowing a free for all for these amazing young people and instead do right by them by making meaningful standards that include trained individuals to have true standards to guide instruction.</p>	11/7/2015 12:55 AM
18	<p>Thank you for opening up the proposed rule to public comment. I appreciate the efforts of the ODE. The reality is that gifted education in many of Ohio's schools is failing or non-existent. Funding and service was an issue when I was a student 35 years ago in a rural district in Ohio. Unfortunately, I have not seen any improvement for my own children (in our current "wealthy" district; as labeled by funding standards). In fact, I have seen it regress. I would like to see ODE embrace our gifted children, especially at the elementary level. Advocate for funding, require service, provide support and training and require district accountability. Gifted is "special" education also and these students deserve educational opportunities. We should be striving to provide the best education for all. Thank you for your time.</p>	11/6/2015 11:45 PM
19	<p>This rule seems very open and flexible. It appears that the guidelines are being loosened to the point that they will be applied inconsistently across Ohio.</p>	11/6/2015 10:53 PM
20	<p>The proposed rules do not outline specific standards for providing gifted students with services. They also do not provide any criteria for determining what standards should be used, or for any objective third party assessment of the quality of services provided.</p>	11/6/2015 10:33 PM
21	<p>Yes! I'm tired of ODE pouring mindless amounts of paperwork on teachers without any time to do it! I'm sinking amid OTES, portfolios, third grade guarantee, benchmark data collection, CHATs, IEPs, 504s, and ETRs. I want to be a reflective educator yet all I do is push paper for ODE. Enough is enough!</p>	11/6/2015 9:58 PM
22	<p>It is essential that gifted services are provided by teachers who are specialized in that area. Gifted teachers are interventionists who understand how to let gifted children think outside the typical classroom box. Funding is necessary to maintain the gifted classrooms. These gifted kids find solace in those 225 minutes where their wings can spread. Those minutes of expertly guided freedom lets them perform to their maximum potential throughout the entire school week.</p>	11/6/2015 9:29 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

23	<p>Gifted education should be highly valued and protected in Ohio. The only way to ensure that this happens is to provide very detailed standards for school districts to follow, and consequences for non-compliance. Given the choice, many school districts will choose to allocate funds to other programs to reduce their budgets instead of providing for the needs of gifted children. Leaving the decision up to each school district for how they handle gifted education puts gifted children at the mercy of the priorities of the school district. If their education isn't seen as a priority for additional resources, they aren't going to receive quality, differentiated instruction. Their academic, social, and emotional needs are different than those of other students, and if they aren't met, can lead to frustration, apathy toward school, under-performance, behavioral issues, moodiness, and depression. Gifted educational services are not a desire for gifted students, but rather are a need that must be met. Otherwise, we are failing our brightest children.</p>	11/6/2015 8:52 PM
24	<p>Gifted intervention specialists seem to have many extra assessments and reports to complete in addition to teaching the students. In order to complete these extras AND provide the students with the education needed, these teachers should have a lower teacher student ratio that maxes out at 18 students per class.</p>	11/6/2015 8:49 PM
25	<p>How would these rules apply at the high school level? We have enriched courses in all content areas and at all grade levels. Are these teachers required to have gifted certification?</p>	11/6/2015 8:45 PM
26	<p>I have 27 years of experience in education. I have been a Gifted Coordinator/Director for last 15 years and previously the Gifted Teacher with my credentials in Gifted. My prior 12 years were as an Intervention Specialist in another district. So, I understand special populations and teaching them. I am very disturbed by the drastic changes and eliminations of any quality standards made to the new Gifted Operating Standards (GOS). I have never been as worried about the status of Gifted Education in Ohio and my district as I am presently. Especially in light of the high accountability measures for gifted student performance on our local report cards, including Gifted Indicator-Gifted Performance Index and Gifted Value-added portion of the report card. With the proposed changes, how can districts possibly be effective in making a true difference for these gifted students if you eliminate all the requirements that protected "QUALITY SERVICE" to this population? How are you going to measure any effectiveness to programs, service, professional development or staff with these eliminations? You are stripping the highly qualified gifted teacher's requirement and presently they are the only ones trained in gifted to teach them. You seriously think that anyone can teach gifted and expect those students to perform more without any training? I do not think you can without these protections in the GOS. Districts will quickly eliminate gifted programs, times for direct service, overload their caseloads and let anyone in the district service these kids. This is the only subgroup population that has no one advocating for or protecting their academic needs except Gifted certified staff. We are heading in the wrong direction with these changes and I respectfully request that you add the following things back into the GOS, as were in the original March 2008 Rules or address these issues with careful consideration of our concerns. Remember we are out here in districts living the reality of these decisions made every day and must address them with the parents of these children.</p>	11/6/2015 8:07 PM
27	<p>This was a hastily drafted process, and it was very poorly communicated. Why, for example, was a notice letter outlining the changes not sent to every parent of a gifted child (like me) at least 30 days prior to closing the survey and comment period? I learned about this change via a social media post only 48 hours before the survey closed. And my spouse and I informed our own Gifted Intervention Specialist at our school and asked what she knew about it (even the gifted staff who serve our students in the schools were not aware of the pending change). That is inexcusable! At a minimum, a significant change of this nature should be communicated TO ALL IMPACTED PARTIES (staff, parents, administrators, etc.) 30 days prior to taking any action or closing the period for comments. Please do better next time.</p>	11/6/2015 6:08 PM
28	<p>The proposed rule limits gifted standards and measures of quality which hold districts accountable. The Ohio Department of Education would be out of line with it's responsibility to hold school districts accountable. The proposed rule eliminates many of the tools currently used for districts that are not compliant with gifted laws. The proposed rule ties the hands of both the State Board and the Ohio Department of Education to the extent that they will not be able to provide leadership and guidance to those assigning state resources.</p>	11/6/2015 6:02 PM
29	<p>Flexibility may be needed if allowing more teachers to serve gifted students, but Gifted Intervention Specialists should be required to oversee any building that claims services. As the parent of a gifted student, I know that she is easily overlooked because she "gets it". However, she deserves to learn and grow like every other student in that classroom. The GIS is a valuable resource and touchstone for her.</p>	11/6/2015 5:58 PM
30	<p>Thank you for taking the time to make a commitment to the gifted student population.</p>	11/6/2015 5:19 PM
31	<p>Stick with existing rules or use them as a basis for change.</p>	11/6/2015 5:16 PM
32	<p>It is with great sadness that I received this much waterdown proposed rule and it is my great hope that my recommended changes will be made to ensure Ohio's gifted children receive an education to their full potential.</p>	11/6/2015 5:12 PM
33	<p>The rules/guidelines are very general. Gifted children deserve the same type of attention that we give to students with disabilities, as they are similar just in the opposite direction. Schools should be held accountable for the students they identify, the types of services these students receive, and the progress they make. It should be clear that there are guidelines for testing students, for highly qualified teachers and gifted coordinators, and for services. This proposed rule does not set clear expectations, as much is left to interpretation by the district. In our era of expectations, accountability, and quality service for ALL students, this rule sadly falls short.</p>	11/6/2015 5:08 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

34	What is the purpose of the program if no requirements are made necessitating adapted instruction for gifted students by fully qualified gifted teachers on a weekly if not daily basis?	11/6/2015 5:06 PM
35	Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. Reinstate service and staffing requirements that are in current the operating standards as stated in the service section. With the reinstatement of service and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC.	11/6/2015 4:51 PM
36	The proposed rule is too flexible and has too few limits. This rule is so elastic that it has no real purpose. The proposed rule will not help gifted students; on the contrary, it will eliminate most service in most districts. Districts will not voluntarily offer gifted services without rules requiring them.	11/6/2015 4:36 PM
37	No.	11/6/2015 4:27 PM
38	In order to provide appropriate services for an appropriate population with numerous social/emotional and educational requirements, the Ohio Revised Code needs to remain as it is and no time or money needs to be wasted on proposals which would eliminate any consideration of a group of students who have as much right as any other group to a meaningful and appropriate education.	11/6/2015 4:26 PM
39	It will be too late for this plan to help my children who have both been identified previously. My son was taken out of classroom situations where he needed the instruction for his core classes to spend time in GRR to do puzzles and invent riddles. So if the proposed guidelines are implemented and follow up is consistent then the program should be great.	11/6/2015 4:24 PM
40	I have a 17-year-old child who has benefited greatly from the Ohio Rule of 2008 (which was set in place when he was in 4th grade.) If you change it now, you will realize it was the wrong decision, and you will end up tightening it back up again in a few years. Please leave the Rule for Gifted alone. It has, and will continue, to work for Ohio's gifted students. I can say this as a parent of two gifted children, and as a Gifted Intervention Specialist.	11/6/2015 4:19 PM
41	None.	11/6/2015 4:09 PM
42	While I do believe that I, as a parent, am the best advocate for my child's education, I have faced an uphill battle with the school district in terms of tending to the needs of my gifted son and my accelerated daughter. I am NOT encouraged by a proposal allowing districts and schools more flexibility in determining expenditure and direction of this program. Thankfully, the ODE supported my efforts to obtain the needed services for my children. After numerous rejected appeals and phone calls to the district, I would not have succeeded without that support. In fact, the school district, in finally giving in to the required course of action, admitted that their evaluation had been operating on a criteria at least a decade old. Parents and children really need the support of the ODE and OAGC in providing appropriate educational services to our children. In addition, while I am an engaged parent, statistics show that there are roughly 47,000 homeless children in Ohio and many others seeking or placed in foster care Ohio is also one of the worst states for childhood food insecurity. I can only imagine the uphill battle these parents and children face in their daily lives without adding the requirement to advocate for themselves to receive appropriate educational services. While I do not believe the state can or should act as a parent for these children, we must not shirk our responsibility to ensure that these children receive the education they deserve.	11/6/2015 3:51 PM
43	Please look into all of Jonathan Alder's gifted program... especially at Canaan Middle School. It's lacking greatly!!!	11/6/2015 3:35 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

44	<p>I have been involved with gifted education for over seventeen years. Through that time I have seen huge growth for proper identification of gifted students through establishing approved assessments so that students are identified with standardized measures rather than the past huge variations across the state. I have also been a part of modifying services that gifted identified students receive moving from a one day a week pullout program to actual replacement services where students are served by a GIS as the teacher of record in the area of their identification. Remember gifted students are gifted 24/7, not one day a week. The newly instated Gifted Indicator has positively affected each school district I am involved with pushing them to modify their services, properly cluster identified students, and offer enriched or accelerated opportunities to them, finally moving districts closer to the service gifted students should have been receiving all along and that they are truly entitled to. In addition, our newly instated OTES evaluation system has encouraged teachers to get to know their students on an individual basis, what they're identifications are, to pre assess them, and to differentiate and enrich/accelerate their curriculum on an individual basis based upon their need. Educators as a whole seem to be more concerned with the positive growth of every student. As the data has reflected for years, the top quintile of students, specifically our gifted population, has been the group that is historically the hardest to grow. We must maintain high standards of expectations and hold every district across the state of Ohio accountable, these new proposed standards are very weak and leave too much room for interpretation. Please, let's not reduce the gains for our gifted students by adopting these proposed standards, please let's readdress the current standards resurrecting the modifications proposed a few years ago. Let's relook at these and update with today's language and expectations. I feel the older proposals would move us closer to our desired gifted education for the state of Ohio and not the new proposed two page document. Thank you!</p>	11/6/2015 3:16 PM
45	<p>I feel with the new proposed rule the gifted students will be left behind. We as a society will be losing future Doctors, Lawyers, Scientists, Inventors...etc. I implore you to rewrite this proposal so that our children's futures won't be lost.</p>	11/6/2015 3:01 PM
46	<p>Please fund a robust gifted program in Ohio schools.</p>	11/6/2015 2:57 PM
47	<p>Provide funding for gifted students as there is a lot of funding for special Ed. These students are our future, literally, they are the ones that will be in charge of large corporations and inventing things as those of us now are retired and complaining about the presidents of companies. Help them get the best education. Possible and not be turned off from school, imagine what many could do if they had had support of their state and funding to their district when they went through school. Fund what you plan to grade districts on. It isn't fair to small districts that continue to have funding pulled yearly to be held to an indicator that they can't serve due to funds. Also make service codes with GIS support worth more points as accelerated end AP and CCP do already. Those districts with GIS support should be praised.</p>	11/6/2015 2:36 PM
48	<p>No</p>	11/6/2015 2:30 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

49	<p>The Ohio State Board of Education is discussing ways to update its Operating Standards for Identifying and Serving Gifted Students. These comments are in response to the September 2015 draft of the revised standards, with reference to the operating standards that are currently in place (OAC 3301-51-15). We would first like to commend the State Board for adding a provision in the September 2015 draft that would require districts to conduct at least one whole grade-level screening for giftedness within two grade spans. Current policy, which relies primarily on referrals, does not guarantee that historically disadvantaged gifted children will actually be identified as such. This is a significant move in the right direction to ensure that low-income and minority gifted students are properly identified and have the opportunity to receive gifted services. Given the concise draft, a few words on flexibility and accountability are necessary. The September 2015 draft provides districts with greater flexibility. Most notably, it removes many of the personnel requirements around gifted intervention specialists and coordinators of gifted services [OAC 3301-51-15(E)]. We agree with the elimination of any personnel and class-size mandates that haven't been demonstrated to lead to higher student outcomes. In most cases, state policymakers shouldn't be in the business of telling educators how to spend their time, how many students they're allowed to serve, or how they should do their job (beyond basic ethical requirements). That being said, greater on-the-ground autonomy must be accompanied by heightened accountability for outcomes. The first step in accountability is data integrity. That is why we urge the Board to reconsider how it defines gifted services. To ensure the integrity of this data element, a standard and commonly understood definition of "services" is essential. Already, there appear to be inconsistencies in how schools report gifted services, and this limits the use of data for evaluation and accountability purposes. We expect data irregularities to persist—and potentially increase—if the Board further muddies the definition of services. At the least, we suggest that the Board reinstate the current definition of "services" [OAC 3301-51-15(D)], while also considering any refinement that would further clarify the term for reporting purposes. To ensure the accuracy of the identification and service reporting from the district to state level, we also ask the Board to reinstate the audit requirements found in current OAC 3301-51-15(G)(2). We also recommend that the Board oversee the Ohio Department of Education and make certain that department staff is faithfully carrying out these audits. When it comes to results, state policymakers are wisely implementing report-card indicators that track outcomes for gifted children. The measures include achievement and test-score gains—i.e., "gifted value-added." The Board should consider intervention when these outcomes are unacceptable: For example, a school receiving an "F" on gifted value-added for two out of three years could be required to enter into an improvement plan with the Ohio Department of Education. In addition, we would encourage a parental-notification requirement when schools enter improvement status (or fail an audit). There is already statutory authority for intervention based on subgroup performance (ORC 3317.40), and the Board should include strong provisions in OAC that sanction schools that persistently demonstrate poor results for gifted children. In conclusion, as we raise the floor for academic achievement, we also need to raise the ceiling for our highest achievers. The Operating Standards for gifted children should set forth policies that increase the expectations for students with the greatest potential to be Ohio's future science, business, and civic leaders. To do this, the standards need to delineate identification procedures that accurately identify all children who are gifted (while not over-identifying); clearly define "services"; ensure the integrity of data reporting; and strike the right balance between school autonomy and accountability. The September 2015 draft has much to commend, but there's still work to be done. Thank you for the opportunity to comment, and please let us know if we can be of further assistance. Chad L. Aldis and Aaron Churchill Thomas B. Fordham Institute 37 W. Broad St., Suite 400 Columbus OH 43215</p>	11/6/2015 2:30 PM
50	<p>Revise whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that is required in ORC and which exists in the current operating standards. With the reinstatement of service parameters as described above, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. Reinstate the district service plan as required by ORC. Reinstate identification and service definitions as outlined in current operating standards 3301-51-15 and adjusted to some extent in the 11.11.13 draft.</p>	11/6/2015 2:29 PM
51	<p>MUCH too simple, needs to be more detailed, with guidelines.</p>	11/6/2015 2:25 PM
52	<p>Why all the changes? Ohio has had a functional plan for its gifted students for many years and it seems it was more thorough and complete than the one now being proposed. "Why fix something that ain't broke?"</p>	11/6/2015 2:25 PM
53	<p>Our future leaders do not receive the services and the education to compete with international counterparts. Gifted Education should be a priority, not a just a thought.</p>	11/6/2015 1:42 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

54	<p>In short, this rule eliminates much of what was good in the previous version of the Operating Standards for Gifted Students. Instead of striving to improve education for Ohio's identified gifted students, this document seeks to abbreviate the rule and any semblance of guidance needed for Ohio's schools to improve instruction for our high-ability and high-achieving students. The draft of the rule proposed in 2013 wasn't perfect, but it is a much better place to begin. The Gifted Advisory Committee formed in 2013 to review our current Operating Standards was composed of a cross-section of representation of Ohio education groups, as well as gifted experts from across the state. Their work was a collaborative approach, with members sharing documented research-based practices and the perspective of their own districts and experiences in Ohio's schools. Unfortunately, the work of the Committee was ignored and the process circumvented by a member or members of our state's leadership. This current draft of the rule does nothing to promulgate an opportunity to better educate a unique group of Ohio's students. Ohio's schools and the state economy will never be able to sustain improvement if the educational system ignores ANY of its students. This includes gifted students. "Go back to the drawing board" on this rule. Pull out the previous draft and re-work it to reflect best practices, current research, and most of all, the needs of Ohio's gifted students.</p>	11/6/2015 1:37 PM
55	<p>Gifted students ought to be considered to be a sub-category of special needs students, and there should be minimum service that each district or community school is required to meet.</p>	11/6/2015 1:35 PM
56	<p>I have two gifted kids. Our district only serves gifted kids through fifth grade. And only for one day per week. And this is a nicely funded district! Further degrading the requirements for gifted education just makes any rules meaningless. If you want more "local control," fine, but know that this means that districts will take that to mean that they don't have to do anything for gifted kids at all.</p>	11/6/2015 12:53 PM
57	<p>Less is more. I think teachers should be certified in gifted within two years of teaching gifted students. If a teacher is assigned gifted and wants to teach it should have some value. A teacher who is certified gifted and is not doing a good job with it should not just keep the gifted class because they are the only ones certified to teach it. All testing needs to be clearly defined to parents. Too often Gifted administrators do not follow the rules when it suits them.</p>	11/6/2015 12:18 PM
58	<p>Gifted students need special attention, as much as those students at the other end of the spectrum. This attention needs clear and specific mandates to ensure that these students aren't lost in the shuffle. They will not "be okay if left alone". If not sufficiently identified and serviced, there is a strong risk that these students will become bored in the classroom and that their inherent desire to learn will be lost.</p>	11/6/2015 12:17 PM
59	<p>Please consider that these survey questions were biased and leading.</p>	11/6/2015 11:48 AM
60	<p>The best way is to have separate schools for these kids. You are WASTING the best MINDS you have. Put money and time in these kids because they have a higher chance to shine and make Ohio proud. With so many schools for special needs kids and none for gifted children, it's a shame. Give them a chance! The WEP means nothing, it doesn't define what a child learned, they are forced on a different direction that is DOWN. Suppress your abilities to become like everyone else. Let them be themselves and show the world what Ohio is about!</p>	11/6/2015 11:46 AM
61	<p>Gifted kids are happiest when they are intellectually challenged. They can feel ostracized by fellow students who do not share in their interests. If every school district could pull the entire districts gifted population into one school or even a couple of classrooms it would go along way in alleviating the painful social isolation that frequently accompanies high IQ. They need to be able to meet other kids like them. In your average community elementary school with 400-500 kids chances are slim that they will ever meet another child like them. This leads to years of social isolation and the belief that there is something wrong with them. This is not educating the whole child.</p>	11/6/2015 11:41 AM
62	<p>I wish that I knew more about why these changes have come about in this way. I imagine it is in an effort to streamline or make concise, but it seems that items that force districts into providing services/staff have been removed and will allow districts to choose to provide less because it was not mandated by the code. My oldest two daughters have been identified as gifted in our district, and expect that my 1st grader daughter who is working far above grade level will be soon. My oldest has been provided services in reading and math since the fifth grade and is in 8th grade doing high school work now. Without the gifted program and services, I don't believe that she would be achieving as well as she is today. It keeps her challenged in ways that she would not receive otherwise. My middle daughter was identified earlier than my oldest, but was identified in Social Studies where she essentially aced the state test she took. Services are not provided in this area. She was very close to qualifying in reading and math, but because she was a few points off of the identification number so she is not receiving services. She has not been as challenged as she needs to be and it has been a struggle for me as a mother to help her to keep her interested and achieving at levels she should be. I am disappointed in this because I have seen the resources made available to my oldest and they are not available to her and I feel she is even brighter intellectually speaking than my oldest (she just does not have the type-A personality that my oldest has). She has gotten all A's in her first term with grades (she only received number grades last year), and she still claims things are too easy as she has for years. I truly hope that she is able to be placed appropriately as she heads into seventh grade to be in above grade level work to give her the best chance at academic success and as solid foundation for college longer term. I don't know what the implications of these changes will be for my youngest daughter. Will she receive the same opportunity for gifted services that have been available to my oldest? Will services be cut because the proposed code has been stripped down so much? I truly hope not. Please consider how the removal of details may impact how districts provide services and staff.</p>	11/6/2015 11:34 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

63	While the proposed makes strides to address the needs of gifted students in schools, it is biased against schools struggling with funding issues. I would like to see provisions made to support schools who need to implement gifted services but cannot afford to do so on their own.	11/6/2015 11:29 AM
64	Basically if there is no information as previously in the rule, districts will do nothing to give gifted students an education they should be getting. Really?	11/6/2015 11:29 AM
65	What is it about this special population that makes some policy makers so unwilling to follow best practices or to work with the experts in the field? It is time for Ohio policymakers to stop treating gifted students like red-headed step children, to research and follow best practices for this specialty in education, and to stop treating the educators who have broad knowledge and expertise in the field like unwanted house guests. What really matters is that gifted children in Ohio are identified, served with fidelity by professionals who have gifted licensure or FORMAL training, and experience a positive academic, social, and emotional impact from the services they are provided. The proposed Rule will not make that happen.	11/6/2015 11:28 AM
66	This takes an imperfect rule and makes it less stringent. We as a state are missing an important opportunity to support those students with the greatest potential. We must support EVERY child to reach their fullest potential, and gifted kids can too easily fall into the shadows because they are not "problem" students. An effective rule would require attention, effort and investment. This rule falls drastically short on the latter two.	11/6/2015 11:26 AM
67	Please consider screening *all* children, and allowing for more differentiation than pull-out courses that do almost nothing. These children already get less attention than their peers as they are deemed to "not need it".	11/6/2015 11:02 AM
68	It would be preferable if there were consequences for failure to comply. It would be more preferable if the rule required services to be provided, rather than simply setting requirements to be met "where" gifted services are provided.	11/6/2015 10:58 AM
69	The state of Ohio has gone from being a leader in gifted education to sadly trailing in services. More than one opportunity for identification in Elementary School is essential. (I once had 9 students identify gifted for the first time in 7th grade.) Teachers who are educated in the academic and social emotional needs of a gifted child are the essential to provide adequate service. Accountability for how monies are spent to specifically meet the needs of gifted children is mandatory. Stop destroying gifted education in the state of Ohio.	11/6/2015 10:53 AM
70	It is not enough. We are doing a disservice to our gifted students in our state by not adequately providing services to teach these children at the level they require.	11/6/2015 10:49 AM
71	As a parent of a gifted child AND gifted educator (23+years), I am distressed that our previous set of Operating Standards, while needing some help/work to support gifted children, has now been cut drastically to 2 1/2 pages. There is way too much room for interpretation and skirting the real issue of what is best for gifted children. Incredibly saddened and disappointed in our state. We are better than this.	11/6/2015 10:47 AM
72	Please consider that these survey questions were biased and leading.	11/6/2015 10:46 AM
73	It's really bare bones and quite awful. Gifted services should be incorporated with enthusiasm into ALL grade levels, not set aside and shunned like it's a burden. This gives each school the ability to do next to nothing.	11/6/2015 10:32 AM
74	Please consider that these survey questions were biased and leading.	11/6/2015 10:28 AM
75	I keep asking myself this question, "If gifted education falls under the Office of Exceptional Children, how can the mandates, funding, rule, and standards be so undefined when compared to students on the other end of the spectrum (special education)?" ALL students should be given the opportunity to learn and grow from where they are. Research shows that gifted students often have to wait until January to learn something new in certain subjects.	11/6/2015 10:27 AM
76	This is not enough. It is a loss for our state and our society to ignore the group of learners most likely to drive innovation in the future. Ohio is already behind in terms of gifted education. I guess it just isn't a compelling topic to politicians because it is perceived as serving a small group who are already "lucky." but this is a warped perspective. We desperately need to be doing right by our brightest minds. Not because they are more important than other people; but because we face enormous challenges in the next generation and need all the resources we have.	11/6/2015 10:19 AM
77	No. Our comments are already given in the first part. Thanks.	11/6/2015 10:17 AM
78	I am concerned that the standards, which arguably needed to be improved, were reduced by 80% and are now vague and ill-considered. I would strongly urge maintaining the current standards and specifically identifying those portions that need to be updated and leaving alone those portions that are best practices.	11/6/2015 10:15 AM
79	I've read over the current operating standards for Gifted Education. I believe that they provide a much better guideline for the program than the proposed operating standards. The previous guidelines are much more specific which helps to ensure that they are applied more consistently across the range of students which will be using the services.	11/6/2015 10:10 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

80	Ohio public schools have a responsibility to meet the needs of all children. Just as ODE has an entire book on meeting the needs of those on an IEP, the needs of gifted children need to be equally addressed and appropriate services provided. These children are your future leaders and innovators, and to ignore or poorly meet their needs takes away from society as a whole. Investing in these children as we do for those at the other end of the spectrum is imperative.	11/6/2015 10:08 AM
81	PLEASE DO NOT IGNORE OUR GIFTED STUDENTS.	11/6/2015 10:05 AM
82	I would seriously like to see some kind of gifted education provided for students in Ohio regardless of how many gifted kids are in a district or an academy or any other way you want to split them up. That said, I want it DONE RIGHT. I am tired of listening to my high schoolers tells me that they have learned nothing new since 5th grade. I am tired of watching gifted kids fill out worksheets on the proper use of the comma in 9th grade. And yes, these particular children were gifted in the area of English. I am tired of the lack of services across the district because we split them between 4 academies and 2 buildings so we "can't" provide grouped services. I am tired of watching these brilliant kids underutilize their capabilities and waste their time. I am tired of "enriched" classes that answer 3 more questions on a test and that is THE ONLY DIFFERENCE from the unenriched kids IN THE SAME CLASSROOM AT THE SAME TIME. If you are teaching 70 kids at once, you are teaching to the lowest common denominator and asking them to do 4 more parts to an assignment isn't making it "enriched" never mind gifted... This proposal is a first step, but it needs to be even stronger!	11/6/2015 9:51 AM
83	The deregulation and provision of "flexibility" in the 9.11.15 draft of the gifted operating standards does little to help gifted students and much to ensure that districts can do even less than they already do for those students with far greater impunity. I oppose the proposed changes and am a proponent of keeping the existing rules in place.	11/6/2015 9:30 AM
84	There is the impression that the changes to this rule are intended to further cut gifted services in the state of Ohio. I as a parent of two gifted children hope this is not the case. If districts have the impression this is the intention, then they will interpret it that way and continue to cut gifted services. Writing a once annual WEP for kids saying what their goals should be is not serving gifted kids...its pushing paper to comply with a rule. Please place value on gifted children and their education.	11/6/2015 9:19 AM
85	Please use the current rule as your baseline. Then, look for possible additions or deletions from there. Thank you.	11/6/2015 9:08 AM
86	I believe that this survey is bogus. I think that the Board of Education wants to make it seem like everything is better, but its not. This survey depicts ideas that are false. This would be for the greater good if we did follow these standards, but a few changes could be made. For example, we could provide more funding for gifted classes and increase the number of gifted programs in Ohio.	11/6/2015 9:02 AM
87	Please reconsider making proposed changes to the rule. These changes remove protection for gifted children and remove all quality service regarding service and staffing. Gifted children deserve protection and service to meet their exceptional needs and help them rise to their highest potential.	11/6/2015 8:44 AM
88	Gifted identified students deserve high quality, rigorous educational opportunities led by a GIS.	11/6/2015 8:21 AM
89	As the cliché goes, "if it ain't broke, don't fix it". This is so true in this situation. WHAT is the need for these changes and WHY are the proposed changes diluting clearly established standards for minimum service levels and outcomes?	11/6/2015 8:17 AM
90	Go back to the drawing board and come up with a plan that actually supports gifted students, if you really care to do so. Right now, this plan shows that you do not.	11/6/2015 7:50 AM
91	You are moving backwards in gifted education. Benchmark off of leading states	11/6/2015 6:47 AM
92	There needs to be some assurance that all funds associated with gifted education are spent on gifted education, which should be defined as instructional time outside a regular classroom with only other students likewise identified. From experience, additional attention inside a regular classroom is insufficient and does not provide any additional benefit. Service providers should be required to show that 100% of their gifted allocation is used on gifted identification and pull-out instruction exclusive to students at their level.	11/6/2015 6:43 AM
93	I would have hoped with all the research and data we have today that the Dept of Education would have taken greater measures to add to our standards. Turning the standards into a 2 page general document shows the state is not concerned with these learners and would like to just write a small general list to "check off a box" of completed task for the year. These students need tools, teachers and settings to allow them to exceed. If we continue to not provide them these things there is a greater chance for these students to fail, act out or give up on education. Additionally, we are seeing more and more students leave our wonderful public school districts and enroll in private districts, which pulls down our schools as well. Please take some time to work with those parents, parent lead organizations and district administrators to provide a set of standards that is more suited for our gifted learners.	11/6/2015 6:32 AM
94	Seek input from gifted specialists... The people who actually work, educate, and live with these kids. It is very disappointing that you so obviously failed to do so.	11/6/2015 12:59 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

95	I am upset that the State Board of Education Achievement Committee would treat gifted students who need and deserve an education from qualified individuals who understand their needs and are trained to provide the services they need. These students are a treasure to be nurtured and supported, not ignored or used as little teachers. They are not pieces of candy to be handed out to every classroom to "spread the wealth." The lack of respect for academic ability dibbles down from the top, and the State Board of Education Achievement Committee has taken this disrespect to a new low. Reinstate the 14-page rule and take OAGC's recommendations into serious consideration. Our gifted students deserve to have an academic experience that allows them to grow into productive and healthy gifted adults who make our state a wonderful place to live.	11/6/2015 12:25 AM
96	I am not sure that the same guidelines can be applied for all grades k-12. The classes and type of instruction is different in Primary verse Secondary Education. Also the funding piece seems very vague and there seems to be a lot of room to play with numbers. Meaning is a number of AP courses are offered at the Secondary level this could hide a shortage of class offerings and services at the Primary level.	11/5/2015 10:42 PM
97	When I was an elementary school student I experienced gifted services in three very different settings. As a young student, I participated in a wonderful public school program that taught problem-solving, teamwork, and brainstorming through weekly sessions that lasted hours. We were given exciting extra-curricular experiences. The district had the flexibility to provide for a variety of experiences that improved my thinking and learning. In fourth grade, I was able to enroll in a private school for gifted students and thrived on the many opportunities provided by teachers who loved what they did, while I was surrounded by intellectual peers. The class size was intimate, around 15 students. Late in my 4th-grade year, my family moved to another part of Ohio. The gifted program there was taught by a woman who had been forced into the position and was disinterested in gifted students. Gifted services were less than an hour once per week. I was so miserable that I choose not to participate. My fear for my own children is that they will not be able to work with teachers who are passionate about high-ability learners and are not informed about the unique social-emotional needs of gifted children. I fear that services will be so infrequent that they will not be worthwhile. I support district flexibility in providing services to gifted children, but with the condition that the teachers are specifically trained to teach bright students with a reasonable-sized class.	11/5/2015 10:35 PM
98	Our gifted children in Ohio (...and I have three) need operating standards that will ensure they get the level of service they need.	11/5/2015 10:33 PM
99	Unfortunately, these survey questions are highly skewed to elicit what appears to be a pre-determined narrative on the proposed rule. It is amazing to think ODE seems to be setting up our best and brightest up to fail by offering subpar services in name only by unqualified people and without and mandates or funding. It is shameful to me as a Gifted Intervention Specialist and a parent of gifted students in public school in this state. Absolutely shameful and embarrassing that our students will be at the bottom of ranking and if this passes. Our brightest students should be prepped to excel instead. I expect more from my state not this abysmal excuse.	11/5/2015 10:18 PM
100	Along with other advocates for gifted learners, I would recommend the following: 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits. 2. Reinstate and more carefully define service and instructional settings as provided in the current standards. 3. Remove the provision that allows poorly or untrained general education teachers to provide service unless it is an accelerated classroom. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 6. Reinstate instruction time requirement for gifted intervention specialists from current standards.	11/5/2015 10:09 PM
101	What about service time? As this population is under the same umbrella as special ed., it is terribly inequitable to think gifted students do not need a minimum regulation for service time. This rule will perpetuate the inequity of services offered to a already under served population. Countless research shows we already do not meet the needs of gifted students. This rule allows for more devastating decreases in service and makes it seem acceptable. This is ATROCIOUS. I cannot imagine that anyone within the gifted community (parent, student, or educator) was consulted when creating this rule.	11/5/2015 9:53 PM
102	In the last 10 years, with the knowledge that I have two gifted students, I've yet to see improvements to the mandated requirements for schools to provide services to meet my children's needs. We've actually lost one gifted instructor and services have been cut. Our district only provides services for Grades 2-5, 1x/week for 4 hours. And supposedly our District is one of the better schools in the state. How can that be?? PLEASE review your legislation - and raise the bar for educating our gifted youth.	11/5/2015 9:36 PM
103	This rule is devastating to the gifted population. This drastically cuts services to an already under served population, let alone the minority students already under represented in this population. It is upsetting that representatives tasked with helping all students to reach their potential are ignoring their duty and think these new proposals are remotely acceptable. This new rule WILL result in a decrease of services and trained professionals. It is appalling and unacceptable.	11/5/2015 9:26 PM
104	This survey was biased and leading.	11/5/2015 9:25 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

105	This survey repeatedly asks whether the proposed rule is clear. It doesn't ask much in the way of 'is the proposed rule good?' Or effective, or appropriate. The proposed rule lowers Ohio standards for providing gifted services. It removes the clarity of expectations that parents and teachers rely upon--thereby depriving those on the front lines of educating these children the specific guidance they need. Considering how paltry Ohio gifted services already are, this lowering of standards is not an introduction of 'flexibility' but a removal of a safety net for some of Ohio's most under-served students.	11/5/2015 9:22 PM
106	This survey was biased and leading. Please work with the OAGC, parents of gifted children, gifted kids themselves, and other advocates of gifted children to ensure the new proposed standards are enhanced, not stripped.	11/5/2015 9:15 PM
107	Please define quality service, provide caseload limits, require qualified personnel, HQPD and support to classroom teachers, and put in place a process that will yield valuable data we can use to evaluate gifted programing and service so we can better serve our students. Thank you!	11/5/2015 9:11 PM
108	As a teacher and a parent of gifted students, I do not see how this helps educate gifted students. It is more red tape, more requirements, more things to check off of a to-do list that take away from planning and instructing. Of course, I have always been content with our district's gifted program, so I see this hindering the wonderful job they already do.	11/5/2015 8:02 PM
109	I cannot begin to fathom how this happened. I am out of time to lay out every piece of what is wrong with the thinking (?) behind this draft and the horrid consequences this will have for our gifted students. Why does this draft remove all protections for gifted learners and assume that districts will know what to do and will do it, when all evidence is to the contrary? The numbers of bogus WEPs I have seen written in my area in two years underscores that districts are either not knowledgeable about the unusual academic and affective needs of gifted students, or doing what is right is not high on the priority list, if at all. The shift to calling overburdened classroom teachers as service providers by having them watch a webinar as HQPD is another alarming development. Gifted students and their families DAILY fight the notion that "gifted kids will always be ok", when research clearly points over and over again to the disengagement, lack of productivity, and even personal harm that happens when schools have no interest or ability to challenge or understand them. This Document clearly screams that the authors think gifted kids "will just be ok". Not acceptable. It would be better to keep the 2008 Rule than to go anywhere near this one - and I will say that a million times out of a million.	11/5/2015 5:49 PM
110	Leave the funding, staff, and opportunities available for the gifted students. Spend the time, manpower, and funds this movement has cost everyone on more pressing matters: how about figuring out what test is best for all Ohio students to take? Note, test was not plural. Too much of our students time is WASTED on preparing for tests that do not count towards anything. All of the mandatory testing is not a true reflection of what our children know, are learning, nor does it reflect what the children need to know in order to become successful adults. Let the teachers teach the material the students need and go back to one big test a year. More tests do not equal better students!	11/5/2015 4:51 PM
111	None	11/5/2015 4:42 PM
112	If I thought that the proposed rule was streamlining the rule or enhancing it, I would be all in favor of the changes. Instead I feel that the proposed rule has been designed to reduce the services, staff and resources for gifted children in the state of Ohio to almost nothing. How insulting to our gifted students who have the right to identified and served in ways that best meet their needs allowing them to grow and develop in ways that will allow them to be the best that they can possibly be. I have taught in several different states and up until now I felt that Ohio put the needs of its gifted children first and really had top notch rules and laws in place to ensure that the needs of our gifted population were being met. If the new rule goes forward, I no longer feel that is the case.	11/5/2015 4:17 PM
113	The College Career Plus program is excellent for our gifted population. Unfunded mandates hurts small districts. New Gifted policy is an unfunded mandate.	11/5/2015 4:08 PM
114	Overall I feel that there is too much general language and not enough specifics. I feel it leaves too much room for staffing, services, and therefore students and districts to slip through the cracks. There needs to be clearer guidelines for funding and spending so that there can be balance and accountability in these areas. Thank you for your time.	11/5/2015 3:53 PM
115	No	11/5/2015 3:41 PM
116	The previous standards were more stringent. Removing many of them in the name of "flexibility" only serves to allow districts to decrease what is offered, or to offer gifted services through an individual who has no qualifications to teach gifted students. The message from the Department of Education is that educating gifted students in a unique and challenging way is no longer necessary or desirable.	11/5/2015 2:50 PM
117	I am shocked that the Ohio government is trying so hard to practically eliminate quality gifted education in Ohio by creating standards that are practically useless and provide no accountability.	11/5/2015 2:50 PM
118	I feel that Ohio is failing a bit in the gifted program. When they move on to the next grade they should be quite a bit a head because they are doing higher work and I just do not see that happening.	11/5/2015 2:39 PM
119	As written, these operating standards would effectively destroy gifted education. Ohio's gifted students deserve better!!	11/5/2015 2:38 PM
120	These rules are not adequate to assure students receive a minimum service that meets their needs.	11/5/2015 1:53 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

121	I humbly request that the ODE stop trying to "fix" something that is not broken. The high standards currently in place are more than adequate and enable those specific children who are qualified for gifted services to partake in an exemplary program. By enacting the proposed new guidelines, such will only demean the gifted education program, its' teachers and most importantly the CHILDREN! Please, reconsider these proposed guidelines and take into great consideration the comments I and many others have offered. Thank you	11/5/2015 12:46 PM
122	The evaluation for the gifted kids in the district should be done in kindergarten grade. The kids who qualify should be provided the service from 1st grade unlike in 3rd grade which is done by certain school districts.	11/5/2015 12:35 PM
123	The Ohio Alliance for Arts Education believes that the State Board of Education should adopt "rules" that meet the definition of "standard" and establish a level of quality for identifying and serving gifted students, rather than vague guidelines that are open to interpretation and could increase variability in the quality of gifted education programs among school districts statewide. The proposed 9/15/15 draft rule for gifted education programs includes general statements that could lead to misinterpretations of the law, resulting in the identification of fewer students as gifted, a lower quality of gifted services, unqualified service providers, and less accountability for compliance with laws and rules and for the \$68 million allocated by the state to support gifted education. Ambiguous rules could decrease student access to quality gifted services and, most sadly, decrease opportunities for students to achieve their full potential. School administrators, members of boards of education, teachers, parents, students, and the general public rely on the State Board of Education to adopt clear, concise, and comprehensive rules that further clarify the law and support the full intent of the law.	11/5/2015 12:10 PM
124	Students with gifts and talents should be serviced by licensed providers and services should be as extensive and rigorous for this student population as IEP, Tier III services currently are.	11/5/2015 10:50 AM
125	it seems that in an attempt to provide flexibility, the new guidelines remove most, if not all, actual guidance. Surely there is a middle ground that can be reached between the old guidelines and the new proposed guidelines. These go too far to the opposite side - to the detriment of the children who would be served by them.	11/5/2015 7:55 AM
126	Gifted students are a valuable resource in our state. These are the students who will change our world for the better in the following generations. Other countries are investing in the education of the best and brightest for a reason. These students need time together every day with a certified gifted teacher who has had training in working with these students. Please do not cut the amount of time these students need with each other every week, or discount the importance of having a teacher who has been trained specifically to work with these children. We invest so much in bringing the bottom up as a nation, we forget that those who have mastered skills and concepts also deserve to learn and grow into the best they can be as well.	11/5/2015 7:40 AM
127	Honestly, I am not surprised. The folks who feel their students do not receive adequate development will leave public schools. You folks continue to meet your goal of destroying the public school.	11/5/2015 6:11 AM
128	Please do not gut these rules as you have proposed. Our gifted students represent the best our country has to offer the world -- we lament declining test scores, declining innovation, declining creativity, all while refusing to invest in educating ALL students to their best abilities. When my sophomore was a first grader, I begged for classroom differentiation, but was told that nothing could be done until gifted services--a math and language arts enrichment program in our district--began in 2nd grade. I thought that was awful -- until the law changed, and services were reduced to just math--and not until 3rd grade. So my younger (and probably brighter) son struggled mightily in elementary school because he was not receiving instruction at his advanced level. He was so frustrated that it caused social and behavioral issues. Last year, his very observant 6th grade teacher recognized the mismatch and suggested we consider full-grade acceleration. So far, acceleration is working well. In a district without such support for gifted students, this child would have been a prime candidate for dropping out in the transition years. We got lucky. My students are fortunate to be in a district with gifted services, gifted specialists, many opportunities, and two parents who are willing to advocate for them. And yet, neither is being pushed to their potential. I can only imagine the lost opportunities in our state in the many districts where gifted services are given lip service now -- and if they are allowed to even further define their own programs, how many gifted students will find themselves at an even greater mismatch and become too frustrated to even finish school? How are we to compete in a world economy? Ohio executives already complain about the lack of a trained workforce, the loss of young talent to other cities. How will we develop the bright minds of the future? Who will work at Battelle and Chemical Abstracts in 20 years? What bright minds will want to move to Ohio if the public schools cannot serve their bright progeny? Do what is right for ALL students. Not what is politically expedient.	11/4/2015 10:29 PM
129	As the parent of a gifted student in the state of Ohio, I am appalled at this attempt to eliminate any meaningful service provided to Ohio's gifted population.	11/4/2015 10:20 PM
130	It seems to be a move in the right direction: The important factor to a great education system is an informed public, not a overarching bureaucracy. Minimal interference from the state. The state should require the district to inform the public then the state should get out of the way and districts make their own determinations. I like that districts can determine criteria for who can be qualified to instruct the gifted. Many excellent teachers without "gifted" certification can serve these students exceptionally well and should be allowed to do so.	11/4/2015 10:13 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

131	Gifted children, with an IQ of 130 or above and/or achievement at the 95th percentile or above, or who have unusual abilities in creative thinking or visual or performing arts, are as far from the mean as children with an IQ of 70 or below, or achievement at the 5th percentile or below, or who have severe physical or emotional disabilities. Other special populations have strong state and federal protections. If those were not present, would some members of the State Board of Education want to gut those regulations to give superintendents "more flexibility"? Districts already had amazing flexibility with a variety of settings for service. This proposed Rule would give districts carte blanche to call anything service and let them game the system to get indicator points at the expense of an appropriate education for gifted children.	11/4/2015 9:52 PM
132	As a non-parent but concerned community member (who in full-disclosure benefited greatly from gifted programs for elementary and junior high school in the mid-1980's and early 1990's) I do not think this proposed rule serves our current or future students well. This is concerning not only for the short-term education of these children, but also for the long-term future of the state of Ohio.	11/4/2015 9:44 PM
133	I would like to see our state step up and support gifted children in a meaningful way. We have special services to support those who are exceptional in sports, or art, or music, or those who are so far from the "average" that they need special support in order to maximize their potential. We need to include the gifted in these categories. It is not shameful to be gifted. Identify the gifted and support them with required curriculum, certified gifted teachers, and funding.	11/4/2015 9:12 PM
134	As one who believes in a public education, with these changes, my child's needs will not be met. This will make us consider homeschooling our child in order to meet their specific needs. Please keep high standards for ALL children.	11/4/2015 9:04 PM
135	Again, needs to be like the past this is not going to service the gifted students as best they should be.	11/4/2015 6:10 PM
136	The state needs to require districts to serve gifted students. It should provide funds for that purpose to the same extent it provides funds for special needs students.	11/4/2015 5:41 PM
137	Write this rule as if it were your child participating in the program. It feels like this is just for show and not a functional well defined long term plan for the schools to follow.	11/4/2015 5:27 PM
138	Decisions about the education & betterment for our gifted children should not be determined by individual school district administrations. The talented and gifted students deserve to be taught at their level and to learn something new everyday by certified gifted intervention specialists. Administrators who are uneducated and inexperienced in this level of learning should NOT be making these very important decisions, as to who teaches our gifted children and how it should be presented.	11/4/2015 5:01 PM
139	Gifted services should offer as much to the identified students as other programs such as special needs children do. That means funding at the state level as well as the local level and specific standards as those for other children. These children need to have special attention paid to them in the area where they are gifted so that they are able to grow and succeed with their gift. There are experts and research available to better define an outline or template to assist school boards, administrators, counselors and teachers with assisting gifted services. Asking for an accounting of exactly where they spent the money and how many kids they tested and report how they tested every year is just busy work for the school districts. Although it is important that they have some accountability--make it outcomes based reporting rather than process based reporting. Let them spend time on what is important--teaching our kids. Thank you for allowing input from parents like me for these standards	11/4/2015 4:56 PM
140	It seems that the intention of this document is to move away from requirements of districts in gifted education. The students in this population are not being respected and recognized as the valuable resource to the future of society that they truly are. Gifted children deserve better.	11/4/2015 4:47 PM
141	The proposed rules are overall too minimal and too general to provide potential miscommunication. Before proposing new rules, parents want to be informed the reason to change and the problems of old rules. Ohio already changed academic state tests a few months ago after children and schools spent several months to be trained for the CORE-related state tests which are supposed to be nationally comparative. Parents and children need consistent and clear education guidelines regardless changing of education board members.	11/4/2015 4:35 PM
142	Rules are what is killing education. I have seen many great teachers jump ship to other careers bc they were fed up with regulators.	11/4/2015 3:53 PM
143	The proposed changes of the State of Ohio as related to GT programming are totally unacceptable! These were obviously written by people who are professional but totally uneducated in the area of "gifted", "talented" and have no clue how to address/serve critical thinking, problem solving, and creativity! What an extremely sad commentary this survey is! I for one am very proud of the hours many folks throughout the state have spent helping to determine programming for high ability students! Please listen to their expert knowledge and more importantly, remember the children they serve! Meeting the needs of GT students throughout the state must continue! This proposal in no way meets those needs, but only serves to destroy what so many knowledgeable educators have done throughout the last fifteen years. Please consider the ramifications of these changes to gifted and talented rules!	11/4/2015 3:33 PM
144	For the average lay person weeding through such a proposal is very challenging.	11/4/2015 3:30 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

145	It is a mockery.	11/4/2015 3:17 PM
146	Schools bend over backwards to accommodate students of low IQ and disabilities. Equal accommodations should be available to those with higher IQ's so they do not become bored and fail to reach their potential.	11/4/2015 3:15 PM
147	As a GIS I find it very disheartening that we are moving in the direction of less is more for our gifted learners. As a nation how can we expect our students to compete in this 21st century world if we do not even have minimum standards on the best way to serve our most talented students? The proposed standards will ensure mediocrity in our most capable children. Please reconsider reinstating minimum standards for the sake of the future of our students.	11/4/2015 2:07 PM
148	While the rule is written generically to allow for flexibility among districts, it does not appear to set any minimum standards or provide guidelines for parameters/expectations in order to safeguard programs or ensure equal access for gifted students in academically vulnerable districts.	11/4/2015 1:30 PM
149	These gifted students, just as any other groups, deserve good education and protection of appropriate education to meet their needs.	11/4/2015 1:29 PM
150	My district has told us that they identify students as gifted in much the way that is described here, but they offer almost no programs for gifted students. They said there are no requirements at the state level that they do anything for young students and this is missing a huge opportunity. If you don't attend to a gifted student early they will have checked out of the education system by the time they get to high school. If they have never been challenged they will lose interest.	11/4/2015 1:28 PM
151	Please assure that standards for all gifted students in all gifted programs will be supported equally across school districts, paying particular attention to those districts that are less affluent.	11/4/2015 1:13 PM
152	Gifted education in the state of Ohio is so severely lacking as to be non existent. I have two sons, both identified gifted, one also considered disabled. Their years in our local public elementary school were miserable. They were years filled with both boys feeling out of place and misunderstood. They were years filled with my husband and I attempting to work as a team with a school looking to do little more than the bare minimum. Both boys started as bright, enthusiastic learners, and ended with them graduating bitter, angry, and lacking any confidence in themselves. We are wasting a resource. We are damaging children. We are failing those who have great promise to give back in the future. I urge you, now, not later, now, make a difference in the lives of these children, these future leaders. They can NOT do it on their own. They need to be nurtured and encouraged and provided with ABILITY APPROPRIATE opportunities, just as any other student needs, and deserves. It is not only in their best interest, but in ours.	11/4/2015 12:50 PM
153	The proposed rule is unacceptable. The state needs to provide more specific guidelines than are proposed to ensure that students who are identified gifted are receiving qualified services. It feels as if your current proposal waters the requirements down to nothing. I feel strongly that we need to provide quality gifted services to these students throughout their public school careers. They are our best and brightest. Without proper supports in place, they will settle for mediocrity. We need to push these students to achieve and move beyond what they can even dream of doing! The proposed rule definitely is a step in the wrong direction. Please reinstate the framework from 2008 and properly research WHAT'S BEST FOR KIDS in regards to gifted education. Consult with experts in the field of Gifted Education and with parents of gifted students.	11/4/2015 12:03 PM
154	Gifted students are the future of the world. They are engineers, scientist, mathematicians, computer analyst, and researchers that will lead the world. If anything The Ohio Department of Education should be trying to figure out how to pump more money in to this program and structure it in a way so that it only grows and gains more attention. The last thing you want are people with bright children retreating to private schools because the gifted offerings have dwindled to so little that no one stays in public schools. Those of us who have gifted children have very expectations for them and realize their boundaries are limitless unless of course all of this changes through the new standards. I would encourage to work closely with Ohio Association of Gifted Children and review there there draft of standards.	11/4/2015 11:48 AM
155	I support the draft offered by the Ohio Association for Gifted Children. This legislation guts incentive for districts to offer quality programming for gifted children by qualified instructors. Asking whether these guidelines are clear is not asking whether these rules are good ones. This survey, this request for feedback is as shoddy as the new rules.	11/4/2015 11:28 AM
156	No thanks. I have had enough.	11/4/2015 11:10 AM
157	once again, the Ohio department of Education is putting politics and policy before children's education! Leave the Gifted Education standards alone!	11/4/2015 11:01 AM
158	Please do not cut funding or reduce services for gifted students.	11/4/2015 10:57 AM
159	We need to include specific requirements on how you will support gifted students - there needs to be special instruction given to these students and it needs to be required in this rule. Its not enough to merely test them and identify these students as gifted. It is our responsibility to teach them under special curriculums as well. Well off school districts would likely be fine - what about the lower income areas? They need to be supported as well. Also, we need to add that any instructor of gifted children requires special training. That is missing here.	11/4/2015 10:57 AM
160	Yes. The gifted students in Worthington receive more support than blind students. They are more than served! They actually need to spend more time with typical peers and teachers.	11/4/2015 10:55 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

161	This is unnecessary and a step backwards hidden in the guise of flexibility and local control. Ohio was already lagging with its services to gifted children and these changes simply allow more gifted students to fall through the cracks, not reach their potential, and contribute to the brain drain in Ohio, which ultimately affects our economy and quality of life.	11/4/2015 10:11 AM
162	Where are the criteria (service settings, who provides it) for services given to gifted kids? What will happen to contact time for students? Who is qualified to provide the service and how are they determined to be qualified? I have always thought of gifted education services in Ohio as being "all or nothing" - schools are required to identify but not serve. If they do provide a service it has to be a minimal number of minutes by a specific provider. I'd like to see some mandate of services as well as meaningful WEPs. Without an individualized approach and a meeting of parents, student, AND school personnel, WEPs are simply a cut and paste form outlining what happens in an entire class. Seems like a waste of time and paper to me. I'd rather they didn't happen at all, freeing up time for educators to work on how best to educate and challenge my children.	11/4/2015 9:28 AM
163	As I said previously, there is so little detail in this proposed rule that it is unclear what is being required. Quality gifted services and identification have been declining and will continue to decline if this rule is approved. Our gifted students deserve better!!	11/4/2015 9:02 AM
164	I am concerned why the State Department of Education would consider any measure that could lower the standards for the education of gifted children in any district.	11/4/2015 8:56 AM
165	As a parent of a gifted child, I am very concerned that these rules essentially gut any real requirements or enforcement powers and relinquish almost all control back to school districts, which are simultaneously being squeezed by the redirection of their funding sources to create a so-called "Budget Surplus" - when times are tight, things like gifted services, the arts, and anything "non-core" are the first things to be cut. While I live in a school district that likely can weather this storm and continue to provide reasonable gifted services, I pity the children and families in poorer districts where gifted services are already under enormous budgetary pressures. Please revisit these rules and consider substituting the OAGC's recommendations for servicing gifted students.	11/4/2015 8:46 AM
166	Leave what was there before alone. Why are we changing something that seems to be working. If you are going to have proposed rules, state why the current rules are out of date or why they are hurting our children. From what it appears it is just trying to give all schools access to a gifted program without having qualified individuals assessing and educating children.	11/4/2015 8:14 AM
167	I think the proposed changes will significantly decrease the level of education provided to our gifted students in Ohio. There will be dramatic inconsistency between districts unless funding parameters, audits, and specific requirements for what is considered gifted education are set in the standards.	11/4/2015 7:42 AM
168	This survey will attract, disproportionately, advocates for a significant increase in G/T support. It would be my hope that the survey designers are mindful that the responders in no way represent the population as a whole. (In fact, why was "G/T parent" not a participant identifier at the onset of the survey???)	11/4/2015 6:55 AM
169	Please seek out the recommendations from experts in the education of the gifted and talented available to you in the state of Ohio. Jane Piirto at Ashland University should be your starting place.	11/4/2015 6:07 AM
170	I would implore the ODE to consider the language of the proposed Operating Standards. There is some ambiguity in the language that needs to be tweaked. Also, allowing districts to determine how gifted students are to be served will assuredly place them in regular classrooms being taught by educators who do not have the credentials a GIS must procure. Gifted courses and on-the-job experience have proven invaluable to the GIS. A highly qualified educator does not necessarily constitute an impeccable gifted educator. As with SPED, gifted individuals need to have credentialed Gifted Intervention Specialists mentoring them. They also need to know that their social and emotional needs are pivotal to overall success. The basic academic teacher does not possess this training, even those who have gifted children of their own. I can foresee gifted students becoming underachievers and feeling as if no one truly understands them. Local district control could be devastating. Thank you!	11/4/2015 5:33 AM
171	Consult with gifted specialists...I'm just a parent!	11/4/2015 12:12 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

172	<p>As a former External Community Leadership Council Chair, and current District Advocate; these are my personal views and opinions and does Not represent any group, council, board, or advisory; I am currently serve on or engaged with or pursuing as a volunteer community advocate. As we enter this highly charge political year ahead, words are skewed to benefit, or remove or to confused the responsibility of trust for collaboration, where responsibility in education for all children are being abdicated from or by funding cuts; flat-funding; or the wait who is responsible for proper education funding furthering the cultural learning gaps; parental lost of interest in the process and other excluding voices of parents that are needed for all special needs and gifted children academic educational standards. What we are reading lately about state support, is not what we are getting for our gifted and special need children. As silo planners and misguided changes in misguided mandates thinkers continues, there will continue to be a lack of accountability and responsibility that further the gaps both, social and culturally towards more disenfranchised populations. Specifically regarding the new standards-threshold on gifted performances where the now indicators are again being revised by the Ohio Department of Education. As indicated in the message below the standards threshold elements are currently set very low. The revised water down standards makes Ohio among the worst in educational achievements of economically disadvantaged gifted students, including those communities and neighborhoods who are identified as economically disadvantaged populations. Just think, if your child is one of those students caught-up in this gap, Devalue achievement gap where learning is no longer required for them to perform. just look at the numbers. Especially of those children and students coming from quiet poverty stricken area, tucked away in some remote corner of the commuity that has no voice or rarely seen in this misguided silo plan of thinking. As a parent, and volunteer member of our community, we must be involved in stopping this slippery slide of to a quality education that must include all children. I urge all of us to pay close attention to what is happening to our children's educational academic achievement processes, where there are lacks of professional cultural development needs of understanding also. Lonnie Tucker CHE, CSW Parents -District Advocate [REDACTED]</p>	11/3/2015 11:36 PM
173	<p>To the casual reader, the wording of the proposed rule looks well thought-out and thorough, designed to ensure the needs of the gifted population are met. How deceptive! This is some evil, political tripe, carefully crafted to appear as one thing when in fact it is the opposite! Shame! What this would really do is allow the ODE to back away from DOING ITS JOB by passing responsibility back to the districts, who in turn will get to determine their own standards, however weak they might be. If we wanted to handle this locally, we'd lobby our school boards. Instead, the elected representatives of the People of Ohio have passed legislation with the expectation that ODE will promulgate that law state-wide. To back away from that responsibility not only leaves the gifted population to a local roll of the dice, it neglects the will of the citizens of Ohio.</p>	11/3/2015 11:24 PM
174	<p>I do hope that you are not treating this instrument as being scientifically valid. It suffers from "self selection bias" and is overly complicated and extensive. Survey questions need to be asked about something that a person can be reasonably expected to have an opinion about. This is basic survey 101 stuff. I teach this in my basic government 101 courses in college. This is truly, the worst "survey" I have ever seen. I am sure that someone worked very hard on this and that it reflects internal language quite nicely. But frankly, I'm not on the inside circle. This is gobbledygook and if you think you are getting scientifically valid information from this instrument, you are mistaken.</p>	11/3/2015 10:30 PM
175	<p>Keep raising standards for gifted education. The proposed rules are a step in the right direction, but I would like to see more transparent standards elucidated for parents and the public to evaluate. It seems historically that the Ohio Department of Education has a "trust us, we're the experts, and we know what we are doing" attitude when it comes to standards for teachers and education. Having been subjected to several idiotic educational policies over the years (the most recent being Common Core), that attitude doesn't sit well. The standards are going backward! For those of us who demand a more active role in directing our children's educations, we should be included on your notification lists and not be relegated to being told third-hand by relatives about surveys like this. It should be required that all parents in all districts should be notified with handouts or by other information pathways before rules are proposed or changed or policies implemented so we have input. Thank you!</p>	11/3/2015 10:03 PM
176	<p>I can somewhat understand the changes, but it's difficult to fully comprehend the impact of screening and how gifted instructors will be established. I do have concern that general education instructors may not have the tools and experience to fully develop gifted students considering their learning and emotional patterns often differ from the majority of the student body. Gifted instructors must have the ability to identify and establish a very individual learning plan which takes time and cannot be rushed/overlooked if classroom environments and teacher to student ratios are not maintained.</p>	11/3/2015 9:54 PM
177	<p>There needs to be many revisions to this proposed rule before this is voted on. This proposed rule is unbelievable! It is essential that you listen to the input of teachers and parents of these gifted student and make changes before it is too late,</p>	11/3/2015 8:19 PM
178	<p>why not allow the gifted experts have input in drafting the document</p>	11/3/2015 7:45 PM
179	<p>Please keep in mind that increased flexibility in the standards can equate to subpar services in certain districts. Do your best to advocate for enhancing, rather than decreasing gifted services in Ohio. Our gifted kids deserve the same standards of education and support that other special needs children receive. Thank you for the work you do to better our education system.</p>	11/3/2015 7:44 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

180	I like that the rules give districts flexibility in services. I think, for most districts, this will allow us to reach more students and provide more services. My only concern with the proposed standards is this statement: (6) In order to assure inclusion in screening and assessment procedures for all students, including minority and disadvantaged students, students with disabilities, and students for whom English is a second language, districts shall: (a) In the areas of superior cognitive ability, math, reading, science and social studies, conduct yearly at least one whole grade screening in grade band K - 3 and at least one whole grade screening in grade band 3 - 6 This language implies that districts must provide whole grade screening in superior cog, math, reading, science AND social studies. Our district currently does whole grade screening for superior cog and uses teacher/ parent referrals to test for academic areas. I think that adding additional whole grade screening would result in more time testing and less time teaching (especially in the 3-5 grade band). Not to mention the additional cost that districts would need to absorb for whole grade screenings. Also, what is the benefit in identifying students as gifted in districts are not providing services?	11/3/2015 7:22 PM
181	Just re-examine the components of the indicator.	11/3/2015 7:21 PM
182	Should have clarity about full school year, what they would be focusing on, how they will reach their goal. What are the activities they would perform. Should also report weekly/monthly about students.	11/3/2015 7:20 PM
183	As a educator who began working with gifted programming in 1980, it is most disturbing to see so many of the advances that Ohio has made be wiped away in one document. We worked diligently for many years to gain respect and accountability for our gifted programs. In recent years Ohio has become a "flagship" state for quality gifted education; please don't destroy this.	11/3/2015 7:02 PM
184	Keep the old Gifted Operating Standards.	11/3/2015 3:24 PM
185	I feel that going from a 15 page account of what is expected when identifying and teaching a gifted child to a mere 2 pages cause for concern. There should be clear, concise standards in place that allow for the many different types of instruction gifted children may need. I believe that more input from teachers, child psychologists, and education experts is needed before changing the standards. It should be mandated that all schools must have a gifted program and they should be taught by highly qualified teachers that are certified to teach gifted children. Gifted education should be treated like any other form of special education as gifted children need just as much specialized attention as any other child in special education.	11/3/2015 2:05 PM
186	Make changes to the current law so that providing services to gifted students isn't optional and not contingent to the passage of school levies. What I have seen and heard from other parents with gifted children, is that these kids are just given more work to do to keep them occupied, or the kids once done with assignments can sit and read a book. We are not providing our best services to these children. Once students are identified by the State as gifted, the State must provide the funds to support special education programs for gifted students as done with other special ed. programs.	11/3/2015 1:18 PM
187	I feel the new gifted rule is harming the students for many reasons. School districts should not be able to say who is qualified to teach gifted students. Only teachers who hold gifted certification from an accredited college should be able to serve gifted students. Next there should be guidelines in place for how service is provided. If special education students were serviced in this manner, the lawsuits would be numerous. Finally, we lack educational standards. The State of Ohio will have lower standards for gifted education than a state like Mississippi. I feel the State Board of Education only looks at the dollar line, not what is best for the education of gifted students.	11/3/2015 1:13 PM
188	Gifted education and screening is very important and I like how you are allowing it to happen at all age groups one to two times a year but some schools do not offer gifted education I believe it should be a part of every schools budget to offer gifted education.	11/3/2015 1:13 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

189	<p>As a parent of four children, three of whom are already of school age and have each been identified as gifted, and as a former teacher at the elementary level, I am astounded by the gigantic step backward that this proposal would amount to for my children and my former students. By not providing these children with an appropriate education in the least restrictive environment just as we would for any other child who has unique educational needs, we are doing them a great disservice. At the very least, we are not allowing for them to make a year's growth in a year's time. Nor are we helping them to reach their full potential. Further, we risk turning them off to education altogether. One of my children was placed in a first grade classroom this year with a cluster of gifted children. Due to a large number of gifted children in the grades above hers, the building specialist has no time to meet with them. The homeroom teacher is now cramming to try to educate herself on how to meet their needs. Doesn't the teacher deserve specialist support as her fellow first grade teachers who have clusters of children who are English Language Learners or have Individualized Education Plans? Don't these first graders deserve to receive the services for which they qualify? My fifth grade child received services in earlier grades but now is in a building in which only 20 children (of approximately 200) in each grade level are provided services by a specialist. Is this right? Shouldn't all children who qualify receive expert services? Would we ever accept an arbitrary cap on the number of children who can receive services for any other educational need? My oldest child has completed two whole grade accelerations and two additional single subject accelerations. He is 2-4 years younger than his classmates and took his first high school classes at age 11. While we are grateful to his district for working with us to do something to meet his very unique needs, does this sound ideal to anyone? Would you want your 11 year old child or grandchild walking the halls of your local high school? As much as the educational opportunities have benefitted his intellect, the social and emotional disconnect chafes his heart and soul. We can and should do better. It is high time to provide meaningful services to all of the gifted students in Ohio.</p>	11/3/2015 1:08 PM
190	<p>Hope they take out the class size limit (20 for 4th and 5th grade)</p>	11/3/2015 12:51 PM
191	<p>Gifted services are woefully inadequate in many districts, and we are doing a disservice to the gifted subgroup by attempting to eliminate the reasonable parameters already in place for their instruction.</p>	11/3/2015 12:33 PM
192	<p>What was wrong with the old standards? The State of Ohio is encouraging mediocrity with this proposal. Please do the right thing and involve trained gifted educators in designing an effective policy that truly looks at the well being of these students not just the fiscal well being of school districts. The Common Core standards have left many gifted students bored and stagnant, the 225 minutes of gifted education provided each week is the only thing that keeps my child interested in school. Ohio should lead the way and show that our public education system is not just interested in teaching to the lowest minimum standard dictated by a test.</p>	11/3/2015 12:26 PM
193	<p>The proposed "rule" is a joke. It weakens the DOE and Board to the point that they will be unable to fulfill their statutory duties. Gifted kids are Ohio's future leaders, so why are our current leaders attempting to deny them the education they need to reach their potential?</p>	11/3/2015 11:46 AM
194	<p>To me, it feels like the state is making changes so that more districts can SAY they are serving gifted kids, while quality gifted services could actually be in danger.</p>	11/3/2015 11:40 AM
195	<p>It seems the rule is vague and does not provide goals or measurements for districts or any funding minimums. Outcome based measures are preferred to input based. What is an effective gifted program? How does a district provide it? I would rather see outcome based measurements or at least activity measurements. How many students were served? What was level of service provided? What measurements are best for gifted programs, are Ohio students progressing at same level as other states for programs for gifted students. How does Ohio funding per student compare? What are specific programs offered and how do those programs meet needs of students?</p>	11/3/2015 11:00 AM
196	<p>I support maintaining the current standards or adoption of OAGC proposed standards. http://www.oagc.com/files/DraftOAGCResponseto9.11.15ProposedRuleChanges.10.21.15.pdf</p>	11/3/2015 10:36 AM
197	<p>As I reflect on my 30-year experience in the field of gifted education, I find this rule to be steps backward from progress that Ohio has painstakingly made. Gifted students learn and think differently than their general age-peers; just as students with learning disabilities, physical handicaps, and lower cognitive ability learn and think differently from their age-peers. All of these differently-abled students need instruction and curriculum that is tailored to their differences. These students are impacted by their different abilities all day, every day. While we would not give a child with serious vision problems a large-print text book once a week for 30 minutes and claim that to be appropriate education services, we cannot claim that assigning a gifted child to read a difficult text for 30 minutes during a once-weekly intervention group is an appropriate education service. Years of test data from my district show that when gifted students received minimal (or "drive by") services as described above, there was no evidence of consistent, advanced achievement. When we moved to gifted classrooms and gifted clusters taught by intervention specialists, appropriate education services became part of the students' daily experience. Test data showed evidence of advanced achievement. This approach fulfilled our district mission of helping "all students to achieve their highest potential". Financial issues intervened, administrative philosophies have changed, and my district has eliminated all services (as defined in the current rule) except subject acceleration for middle school math and whole grade acceleration for an occasional highly gifted student. I agree that districts need to have flexibility, and that many decisions (positive and negative) are driven by budgets. This proposed rule, however, allows the specialized expertise from the field of gifted education to be ignored. It is much like our current health system, where medical service decisions are made by insurance experts rather than medical experts.</p>	11/3/2015 10:27 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

198	The proposed rule for gifts education needs to be a robust as those for special needs students. Are all districts required to have a program for special needs? If they are they should be required to have a similar programs for gifted students. This rule appears to allow very limited attention to gifted students with instructions that are not certified in instruction to gifted students. I don't believe this is consistent with the requirements to serve those with special needs and it should be.	11/3/2015 9:45 AM
199	There needs to be minimum level of services provided. Gifted children need emotional and social instruction. It's not enough to just give them extra work. If you were to walk into a gifted contained classroom and a special services classroom without knowing which it is you would see similar behaviors. The child that can't sit still, the child that has to pace, the child that needs to rub fabric, these children are found in both groups. Even the child that has anger and authority issues are in both groups. Gifted children are not the same as high achievers. Their needs must be met or their mental health will suffer as well as their education. I've been down that road with my older two gifted children. Our districts implementation of a gifted contained classroom has shown my youngest what to do and how to handle her emotional and social issues. Pull out only services 1x a week was okay for one child. The year of no services resulted in my middle child beginning to withdrawl from the world. Academic rigor isn't the only service these children need.	11/3/2015 9:37 AM
200	I do not feel that the rule in its current format does anything to help identified gifted children. Please consider the feedback you receive carefully to ensure proper service for gifted students in the state of Ohio	11/3/2015 9:16 AM
201	You had a diverse committee that worked on this issue for a long time. Why are you completely scrapping all of that committee's hard work and thoughtful plans in favor of eliminating any actual standards or requirements? This proposal will allow unscrupulous districts and schools to claim that they are serving children without any evidence that they are actually doing so, or to put so many children in a classroom so as to make it nearly impossible to teach them. This is a terrible rule change and anyone who claims to want the best for children should be ashamed of themselves for proposing this. Keep in mind that a child with an IQ of 145 learns as differently from the average child as a child with an IQ of 55.	11/3/2015 9:03 AM
202	The "draft" doesn't mention fine arts at all - unless I missed it. The four gifted areas MUST be defined/included/stated or mentioned as superior cognitive, creative thinking, fine arts, and specific academic.	11/3/2015 8:30 AM
203	This is the most biased unfair school rules I have seen. It is throwing the gifted students into the forest and saying you are the brightest and best our state has to offer. See you in 12 years! Make sure you continue to reach your true potential. Once a year we will check in on you and make sure you are still learning. Find ways to stretch yourself. We need your teachers for the students that can't meet the goals without lots of intervention. I know you may be bored and begin to loose interest in learning, but you will still meet the requirements for graduation! Please don't do this to our gifted students!!!!!!!	11/3/2015 7:46 AM
204	Overall, I do not see any teeth in this plan - it is really just a lot of fluff that pretty much gives license to continue business as usual. More money and resources have always been allotted for students at the lower end of the spectrum. It is time to equalize those resources and properly fund it as well. Gifted also needs to be understood to be not just providing more busy work, or grouping "gifted" students together in a collective fashion. It needs to be more independent and allowing those students to be better develop his or her particular interest and curiosities.	11/3/2015 7:27 AM
205	On one hand - coming from a state that only has about two "teeth" of accountability in its gifted ed regulations, which aren't even enforced - I appreciate that Ohio has more "teeth" of accountability for the gifted services in your state. That lends to increasing the likelihood that gifted services will actually happen for gifted students in Ohio. On the other hand, it seems some of these rules were written by people who lack expertise in Gifted Education. Trust your experts on gifted education within Ohio (the Ohio Association for Gifted Children, for example). I think you have a decent start, but it needs the touch and finesse of people who have extensive knowledge and expertise in the area. Thank you for the opportunity to review the proposed changes and provide comment.	11/2/2015 11:49 PM
206	The nature of this survey makes it difficult to share real concerns about the proposal. Very disappointing.	11/2/2015 10:47 PM
207	These rules seem almost meaningless. A district must identify students, but at the end of the day they do not to do anything. The state should treat gifted children the same way as children that have fallen behind. As I read the rules districts can do nothing and they do not have to even justify it, just report it. The state needs to compel districts to provide gifted services and adequately fund them.	11/2/2015 10:31 PM
208	would like to see licensed gifted teachers as the one teaching my child; would like to see gifted kids in grades 1-2 also able to get gifted education and not sit by bored in class;	11/2/2015 10:03 PM
209	Please fix this!!! Our gifted students deserve better! We should be doing more for gifted students, not less.	11/2/2015 9:26 PM
210	As stated previously, I have tremendous concerns about these proposed changes. The policies are written in ways that are difficult to understand. It seems that there will likely be fewer opportunities to identify gifted students. It seems you will rely more heavily on testing instead of teacher recommendations and student performance. It seems that the requirements for teachers will be less. I'm struggling to know how this will help our G & T students in Ohio. Why the changes? Budget cuts? I'd like to see a bit more transparency about this. Our kids in Ohio deserve better.	11/2/2015 9:06 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

211	<p>I was truly very saddened to review and decipher the newly proposed Operating Standards for Gifted Education. Saddened because it represents a voice that is speaking with a lack of care and genuine concern for some of the brightest and best learners in our wonderful State of Ohio. We as a state and country can no longer disregard the "gifted child", as one that will be "just fine" and "okay" because they are intelligent. We must remember that they too have need to be properly guided and regulated, so as to continue on and achieve the highest goals that they are capable of. For the State has a responsibility to protect and provide for the educational needs of ALL our children- from the minority and economically disadvantaged districts to the affluent ones. Individual districts must not be allowed to say that any teacher can be a gifted teacher. Gifted students are the least regulated student population in Ohio- and we all together must change this. We all know the catastrophic outcome of 2009, when state funding was removed from specific personnel requirements. There are other states in our country today that are right now developing programs that are geared to attract and retain THEIR gifted and highly intelligent learners to remain in their state to serve in leadership capacities from our government, business, education, etc.,- as opposed to them taking flight to another state or going internationally abroad. My grave concern is that if we don't take care of these learners today...another state or country will gladly receive them tomorrow. Let's get this right ODE. Let's keep the best interest of our gifted learners in mind when setting these new Operating Standards. Is this the best that we can really do? I don't think so. Let's ALL work together...we are not each other's enemy- let's be unified on this. Let's have the best regulated, on point, global model for gifted education that the world has ever seen.</p>	11/2/2015 8:54 PM
212	<p>I think that gifted students are terribly under-served. These students have tremendous potential, but because they do not struggle in school it is easy to push them to the "back burner" and the special education students get significantly more services. I don't think the special education students deserve less, but the gifted students have the potential to change the world and deserve the support in their school years to make this possible.</p>	11/2/2015 8:52 PM
213	<p>Thank you for giving the opportunity to provide you with feedback.</p>	11/2/2015 8:01 PM
214	<p>More specifics are needed so that due to all the state's budget cuts to schools, the gifted programs are not gutted!</p>	11/2/2015 7:29 PM
215	<p>Get more teacher input. This is ridiculous.</p>	11/2/2015 7:27 PM
216	<p>It needs more work. From what I've read about it and from reading what's enclosed in this survey, it needs to be much more specific. Please include the OAGC in any further work to revise it.</p>	11/2/2015 7:20 PM
217	<p>G/T students deserve instructors who are able to accommodate their special needs. Classroom teachers, while willing, are not able to meet the special needs of these amazing young people. Do not put this additional burden on classrooms teachers. Budgetary issues in many districts may force the districts to eliminate Gifted instructors and demand non-specialized G/T classroom teachers to attempt to meet the unique needs of these students</p>	11/2/2015 6:59 PM
218	<p>Funding of gifted education is money well spent. In our rural district the gifted program provides needed challenges for many of our stronger students.</p>	11/2/2015 6:06 PM
219	<p>The changes are ridiculous. If we as a state are going to have standards for gifted education, then we should have clearly identified standards for identifying and servicing gifted students and consequences for when districts do not meet those standards. Ohio does this with special needs children, so it can be done. The only rational conclusion that can be drawn from these proposed changes is that they are intended to alleviate the districts from that awful burden of identifying and servicing gifted children. Board of Education Members: If you vote for this, you should be ashamed of yourselves. By watering down the few standards that are in place, you are telling gifted kids that they do not matter and are not worthy of the same consideration given to other special needs children. You are no better than the schoolyard bullies that harass gifted kids because they are so different than most of the kids. I'm sure your vote is already bought and paid for, but, one day, I hope karma catches up to you.</p>	11/2/2015 5:43 PM
220	<p>I support the recommendations provided by the Ohio Association for Gifted Children</p>	11/2/2015 5:07 PM
221	<p>Need for well- rounded, more intelligent, better performing education majors.Think of teaching as an intellectual challenge, not a sure thing for tenure once the dues have been paid. I am appalled at the times I have heard teachers with half a dozen years experience express that they can just sit back, they are now set for life. .</p>	11/2/2015 4:23 PM
222	<p>Abolish state-run schools. They are a failure. Let freedom ring.</p>	11/2/2015 4:08 PM
223	<p>It's vital that identified students be provided the resources (human, technical, material, schedule) to enable them to achieve their greatest potential. I don't know where the following fits in, but it's also important that gifted students are used as auxiliary teachers. Helping others who aren't gifted doesn't help gifted students become all they can be.</p>	11/2/2015 4:04 PM
224	<p>Please consider using the detailed, current Operating Standards document for a consistent, state-wide approach towards gifted education.</p>	11/2/2015 3:55 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

225	<p>I have a daughter who is both special needs (autism) and gifted. There are two sets of rules that apply in our individual circumstance to make sure that she has an appropriate education, and I'm very familiar with both sets. The suggested changes to the gifted operating standards are shameful, creating nothing more than a giant loophole for every cash-strapped district to walk right through, providing no quality gifted services while claiming to serve gifted children. With no standard of quality, there can be no accurate gifted indicator on state report cards. What if these kinds of changes were made regarding special education for children with disabilities? Can you imagine the lawsuits and the accusations of human rights violations? Of course it won't happen, because the general population sees children with disabilities as a protected class. Having a child with a disability who is also gifted, I can tell you that being gifted is its own special need, deserving of just as much protection as any other disability. Gifted children are cognitively advanced, requiring greater stimulation to remain engaged in learning. They have a tendency toward strong social/emotional deficits that, without proper gifted intervention, can lead to high rates of depression, suicide, mental disorders, and dropping out of school. Without the proper differentiated education, provided by those licensed to handle the special needs of gifted children, these children suffer. My daughter is benefiting from the current standards, and thriving in fifth grade in a gifted school, in spite of the challenges caused by her autism. Her mind is engaged and her social/emotional needs are being met -- these seemingly small changes in her education are reducing the unwanted behaviors caused by her autism. She's a success story on both fronts: gifted and special needs. I urge you not to destroy this foundation being built under her, but rather strengthen it to carry her forward and help her pursue her passions so she can use her intelligence to contribute to society. Please don't confuse "gifted" with "smart" when it comes to education. Giftedness is a specific cognitive state that carries many challenges with it, and high-quality differentiated education -- with strong standards of quality -- is the best solution to meeting those challenges. I'd encourage anyone in the state to please contact me to meet my daughter and see how a gifted education is benefiting her. - [REDACTED]</p>	11/2/2015 3:52 PM
226	<p>I am tired of educators and kids being cut back to nothing by ODE. If we have no standards for service for gifted kids, which kids are next?</p>	11/2/2015 3:39 PM
227	<p>Stop allowing students to receive an "education" from people who have no business "educating". Educators spend years and tens of thousands of dollars obtaining special training to best serve individual students.</p>	11/2/2015 3:36 PM
228	<p>In general the rules seem to have overcorrected and allow for too much flexibility. Something in between the prescriptive current rules and this I believe is a better middle ground.</p>	11/2/2015 2:56 PM
229	<p>The standards for struggling students getting services through the special education department, for various needs, are there to ensure good quality education for students. Please do not take standards away from gifted students as they deserve and need the same quality instruction by qualified teachers and coordinators. Gifted students learn differently and need support as do ALL children. WE NEED TO CONTINUE SUPPORTING OUR GIFTED STUDENTS instead of lessening the standards for them. No Standards = No Standards</p>	11/2/2015 2:46 PM
230	<p>My children have benefited significantly from receiving 225 minutes of gifted services a week, frankly it is barely enough time to have an impact on their education. A lack of clear rules that define what constitutes adequate gifted education and requires appropriately trained staff will harm gifted education in Ohio.</p>	11/2/2015 2:24 PM
231	<p>The Written Evaluation Plan being made available to parents is very useful, but finding some way for parents to track whether the plan is being met is also critical to its usefulness. If it is not being met, knowing where to report the discrepancy is vital.</p>	11/2/2015 2:20 PM
232	<p>Keep gifted services the way they are, this plan will not help gifted students.</p>	11/2/2015 1:50 PM
233	<p>This is too sparse and too many gray areas. If districts are expected to be accountable, then there needs to be consistency.</p>	11/2/2015 1:48 PM
234	<p>I am highly troubled by the actions of this Board. I do not believe there is transparency on this issue. I do not believe there is adequate time for public feed - back. I believe the language while sounding at first impression reasonable, upon further examination raises some explicit concerns and could have implications beyond Gifted and Talented education and would impact the General education and Special education classrooms as well; I think the public should be able to meet with the Board and raise objections; I think the language should face independent legal scrutiny since it seems to summarily role back thirty years of momentum of educational reform that was of benefit to all students in the State. Further the lack of public involvement and timing, suggest the Board's motives may be political and designed to cower to a small set of Districts or special interest without the needs of the State as a whole; and the needs of Gifted & Talented students and their families and teachers considered. I beg you to seek more public in- put before moving forward. I Sincerely, thank you for the role that you play in the development of our State's Educational curriculum and our sincere desire to aspire and obtain excellence for our children and the future of Ohio. VJ Grant</p>	11/2/2015 1:44 PM
235	<p>As the parent of two identified gifted children, I have concerns regarding the vagueness of these rules. While I understand that rules are written to allow for flexibility, I feel that these rules are so vague as to invite manipulation/distortion in their interpretation. Plus, I can see how the writing as it stands allows for gifted programs to be taken down to a bare minimum, as there are no apparent thresholds, and still be touted as being "offered" within a school system.</p>	11/2/2015 1:19 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

236	Disappointed that the proposed rule has not been better publicized to the community..... Also, as previously noted, I feel that this survey is not properly designed to receive public input since we don't have a way to look at the proposed rule while we answer questions without flipping back and forth through various screens. All in all, it seems to me that the proposed rule is giving the districts too much flexibility in setting up and carrying out their gifted programs since there are no minimum standards.	11/2/2015 12:56 PM
237	As a parent, I am stunned by this proposed draft. What an injustice to gifted students!!! And we wonder why the United States economy still struggles in comparison to other countries. When will exceptional children truly include my child?!?!	11/2/2015 12:13 PM
238	The proposed rule is a minimization of a very involved process. I encourage the ODE to consult with experts in the education of gifted students prior to undertaken rules created by those who have little experience in the process.	11/2/2015 12:07 PM
239	Gifted programs shall be advertised throughout the school year Gifted intervention specialists (IS)shall report to a mentor/supervisor a minimum of 4 times per school year	11/2/2015 11:46 AM
240	I understand the need for flexibility within the districts' control, but in the case of gifted education, the flexibility should be governed by clear and high quality rules that will ensure Ohio meets the needs of gifted students and challenges them appropriately in a systemic way, not piece-meal as it is now. As a nation and as a state, we worry about the "gap" in learning between ethnic and low income children, but without addressing the gifted issue systemically and with integrity, this gap will only increase. That is a total loss to increasing the problem-solving capacity of our state's student population for our future. It will also impact our economy negatively. The difficulty is that the gifted "issues" and "losses" are usually more difficult to see, more hidden and we haven't studied enough quality data to truly understand these. Those of us who can see it up close and personal on a daily basis typically have only observational and soft data to use. And we are often accused of having tunnel vision, self-interest or inflexible in our thinking. We advocate for children that people do not see the need to advocate for because we have a cultural misunderstanding of gifted issues. Parents have little meaningful voice. To stand up for your gifted child is one clear pathway to negativity and ridicule by both educators, family, friends and community members. Most just sacrifice their thoughts. Some do home schooling. Some do charter schools. But again....rural and low income parents typically are not aware or do not see the advantages that more affluent parents do to receiving a challenging curriculum, etc. We, as a state, needs to send a clear message that we have high standards for ALL children and we mean ALL. And that we truly will provide a free and appropriate public education for ALL. We should do it through increased funding for general education as well as gifted education, but regardless of that, we can accomplish more of it through high standards through the gifted operating standards - clearly defined, and accountability for the implementation of those standards.	11/2/2015 11:43 AM
241	What is "local control?" School boards who turn over all implementation activities and procedures to a superintendent? It's a farce. The State doesn't even require a district to include parent feedback. What if we were talking about football? Would you better understand the physical needs for training for a varsity football player vs someone learning the rules of football in a gym class? Why is it so tough to understand that kids who have brains that make quicker or more synapse connections, that may retain information more easily or who are able to make more rapid connections between the different hemispheres of the brain don't require a different approach? It is my opinion that you truly need to think further down the road here. If you remove gifted standards or water them down, the schools will see it as a non-mandated item. It will be cut. Our district ceased to fund the participation fund for International Baccalaureate. Parents grouped to do it. Magnet schools go on the chopping block. Foreign languages get cut. They offer 6 content areas in social studies in 2.5 high school courses. It isn't "if" these things happen. They do happen. You need to understand what this will mean to public schools in the future. If services for the gifted are reduced or eliminated these families will move their children. Will we see institutional classism? Will we see those with money going where their money can get the needs of their accelerated children met? Will public schools become the schools for those who simply can't afford better? How will this drive needs and expenses? Actions bring reactions. Do you even know what percentage of students you are now discussing?	11/2/2015 11:09 AM
242	Gifted students must have a qualified teacher to meet their needs. I have a child myself who has accelerated academic needs that CANNOT be met in a general education classroom. It will be children like him who become the innovators and leaders in the world...IF we give them the opportunities. If we, instead, give all of the support to all other learners, we will create an unfair system that will lead to our country falling behind others due to the best and brightest getting a mediocre education.	11/2/2015 10:56 AM
243	Make the rule more specific, less vague, and allow for less flexibility at the district level to ensure gifted students are served. The rule, as currently written and proposed, provides endless escape routes for districts to shirk their responsibilities of ensuring value added growth for gifted students.	11/2/2015 10:30 AM
244	These draft rules are a cruel joke to gifted students. Gifted students in families who can't afford private education will get even less than they do now. Don't we have a moral and practical imperative to meet the needs of these kids? Why does local control trump student need every single time? What a disappointment that ODE leadership has once again failed to support the boys and girls in Ohio.	11/2/2015 10:14 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

245	<p>The 9.11.15 draft of the gifted operating standards does little to help gifted students and much to ensure that districts will do even less than they already do with far greater impunity. The new standards will effectively allow districts to decide that any teacher can be a gifted teacher and that any intervention, no matter how irrelevant, can be sufficient. Without discussion of the merits of an inputs vs. outputs based accountability system, neither will make a difference for gifted students without quality parameters defining what services are and what level of training is appropriate for teachers to provide those services in various settings. Some regulations exist for a reason. The removal of all staffing, service and accountability provisions in the 9.11.15 draft will make the current poor state of gifted education in Ohio even worse. Districts will soon be legally able to say they are serving gifted children when, in fact, those students will receive nothing more than a piece of paper with a "served" stamp on it. With regard to outputs vs. inputs, due to ever-changing state assessments, infamously low cut scores, and hold-harmless provisions, we are years away from actually knowing the effectiveness of the gifted performance index and value-added scores as output measures. To combat the limitations of these outputs, one element of the gifted performance indicator was developed based on input measures. This was designed to encourage districts to identify and serve gifted children with integrity, but this measure is only as good as the quality of the defined service. If the definition of service is watered down to mean virtually anything a district claims, this element loses all effectiveness as a barometer of district effort. No one would ever dare to suggest that it would be appropriate for districts to define the outputs on any other measure in Ohio's accountability system. So why does it make sense for districts to define the outputs for gifted children? The measure will have little meaning, which subverts legislative intent and good education policy. While this is certainly bad for children, it also makes it impossible to determine what service options are the least or most effective, which undermines any system designed to improve quality. Some policymakers believe it is up to the parents to work with local districts to pursue the services they want and need for their gifted children. While parents are their child's best advocates, the state has a responsibility to protect and provide for the educational needs of all of our children, including those who are gifted. Certainly, there are parents in this state with time and resources who will fight for the rights of their students, though the 9.11.15 draft will make it much more difficult for them. These parents predominantly are in more affluent districts. However, there is substantial evidence regarding underrepresentation and poor performance of minority and economically disadvantaged gifted students suggesting there are countless gifted children whose parents may not be as effective at advocating for their needs. This is sometimes due to lack of education on the topic, a more critical focus on meeting the economic needs of the family, or any other number of reasons. Those children should not be left without a voice. If their parents are not able to speak out and the state offers no protections in the operating standards, who will ensure that their needs are appropriately met? These children are just as at risk as those the state has provided additional mandates to protect.</p>	11/2/2015 9:41 AM
246	<p>In order for our gifted students to grow, we have to provide them with opportunities at school every day. Don't let our brightest settle for being "proficient" when they have so much potential to soar, if given the chance. We owe it to ALL students to provide them with the best education possibly. Please invest in our future.</p>	11/2/2015 9:40 AM
247	<p>No</p>	11/2/2015 9:39 AM
248	<p>Fix this system now so my 3rd grader who is gifted in language arts will have enriching services in her elementary school years like the ones that I benefited from as an elementary student, which greatly influenced my career path.</p>	11/2/2015 9:08 AM
249	<p>It is essential to the future of the United State that we continue to excel in education. We need to foster the full potential for all students. The goal should not be mediocrity for all, but rather to develop the talents of the gifted students to contribute to our future society to the best of their abilities. Just as we will always need people willing and able to collect garbage, plow snow, and mow grass, we also need to develop talents of gifted students to excel in computer science, engineering, and biomedical sciences to tackle the next generation of challenges in these areas including cyber-attacks, food shortages, and disease.</p>	11/2/2015 9:07 AM
250	<p>Read my last statement. I am effectively, worn out from this. The shining spot in my childhood was my gifted class. I cannot imagine a future without those classes. I cannot fathom how adults can justify taking these opportunities away from children. I just cannot.</p>	11/2/2015 9:00 AM
251	<p>PLEASE make sure that gifted intervention specialists, gifted educators and EXPERTS in gifted education are all consulted on these rules. Going from 15 pages of directives to 2 is NOT the way to go. Thank you for working to make sure this population is identified and provided services though, as I know this is not the case in all 50 states.</p>	11/2/2015 8:53 AM
252	<p>I am a parent of a highly gifted, now grown, child who is now raising his own highly gifted child. I have not seen any small district able to provide adequate services. The ESCs may be the answer, but only if all districts are required to meet very specific requirements of time and quality of offerings. I'm surprised parents haven't come up with a gifted charter school solution.</p>	11/2/2015 8:45 AM
253	<p>Thank you for addressing the concerns and needs of gifted students. Helping them to thrive is very important when educational environments are sometimes distracted by disruptive students who are not on their learning level.</p>	11/2/2015 8:38 AM
254	<p>I believe my gifted child should receive services through a licensed gifted teacher</p>	11/2/2015 8:31 AM
255	<p>Please, it seems everything that is being done in the name of "education reform" is actually hurting our children. If you make putting children first, everything else will fall into place. It's really that simple.</p>	11/2/2015 8:27 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

256	Gifted education/service is needed to help these children achieve success. These children usually do not need the repetition of material that is needed by typical children to retain it. However, the need to absorb new information in an environment where their abilities are seen as normal is extremely important especially in females who can be teased unmercifully by other children as being "too smart". As a parent of 2 adult gifted children I am grateful for the gifted education program offered through our school district. It was not perfect but both of my children were challenged by the education they received through middle school.	11/2/2015 8:24 AM
257	Gifted students require as many protections and qualified staff as students in the opposite end of the spectrum. Gifted rules should not be any different than the rules that govern identification and services for special education population....gifted IS a special education population.	11/2/2015 8:15 AM
258	It's time for the ODE to butt out. You are destroying the education of my children.	11/2/2015 7:16 AM
259	The gifted children in Ohio's schools will be the leaders of Ohio's businesses and communities in the future. Gifted children will become researchers and scientists. Gifted students will establish new companies based on the latest technologies. It is important to give them the supports and services they need. I do not say this as a parent, but as somebody who lives in Ohio. If districts reduce gifted services, there will be long term impacts on the quality of life for all Ohioans.	11/2/2015 6:46 AM
260	Please encourage inclusive services. Also, the lobbying group that claims to represent parents and families, like most special interest groups, does not represent all families with gifted children. Some families still care about all children and fundamental fairness.	11/2/2015 6:36 AM
261	Once again, the state is placing requirements on local district while continuing to decrease funding. Testing takes valuable time and adds undo stress on students.	11/1/2015 6:55 PM
262	I'm usually a less is more kind of person, but there was a lot removed from the current standards. Is this best practice?	11/1/2015 2:09 PM
263	This is the worst piece of policymaking I've ever seen. ODE must have no sense of responsibility for children in this state. We need to do more for gifted students, not paint a rosy picture of how no service now will mean full service. What is the point of the department if they can't even figure out how to define what services are?	11/1/2015 1:59 PM
264	There is no need for an overhaul of the current gifted operating standards. The current standards should be strengthened by requiring the delivery of service to all identified gifted students in all districts. Rather than weakening the current standards and allowing districts to dilute already weak services, the standards should be enforced state-wide with a requirement to deliver service.	11/1/2015 12:19 PM
265	The State, the Universities, the districts and the Schools need to have a renewed commitment to students with LD, gifted or both (2e). With technology much can be achieved.	11/1/2015 10:32 AM
266	Please revisit and revise before approving this proposal. The lack of teacher prep in this area must be addressed. Although I like some of the flexibility you're trying to build into this proposal, allowing for more local control, I fear that this proposal would lead to a major step backward for gifted education, if approved as written here.	11/1/2015 5:29 AM
267	It looks like the rules are getting looser for how to serve gifted students. They need to be stricter so districts can keep hiring gifted intervention specialists.	10/31/2015 11:47 PM
268	I hope that it gets approved. Our gifted kids need it!	10/31/2015 7:57 PM
269	I do want to state that I'm really disappointed at how vague these rules are now. It seems like these rules were created to make things easier for administrators, instead of better for our gifted students. I have always taken pride in knowing that Ohio is a state that recognizes gifted students. The new rules make it seem like Ohio only wants to look like they recognize gifted students. The rules are too vague. They don't outline services clearly enough. I am glad that the gifted performance indicator is supposed to drive positive outcomes, but I would like to know that the outcomes are valid and equitable. What is really being measured? I also would like to see that expenditures are clearly defined.(the ESC expenditures make sense, it's the district level expenditures that aren't outlined).	10/30/2015 5:15 PM
270	My only comment would be more money for education, period!	10/30/2015 3:53 PM
271	Reinstating requirements that are in current standards would make gifted education more appropriate and beneficial for our gifted students.	10/30/2015 3:26 PM
272	It is imperative that we have operating standards that are in place to provide quality services for our gifted student population. Often times these students are just as far from the average student in terms of thinking and abilities as our lower performing/learning disabled students (who require special education settings and licensed intervention specialists) just on the other end of the spectrum. Gifted advocates know the importance of providing quality learning experiences for these students. Without the requirements for qualified gifted intervention specialists and gifted coordinators, minimum minutes of instruction, district service plans, and other specifics from the current operating standards, gifted education in Ohio will be greatly diminished.	10/30/2015 3:24 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

273	REinstate the district service plan as required by ORC	10/30/2015 3:16 PM
274	I am perplexed by the lack of relevant information, detailed parameters, and clear expectations in the proposed standards. Such ambiguity puts gifted children at the mercy of people who do not understand them, know them, and ultimately care for them and their unique brand of learning. We have all seen what can happen to gifted education when the notions of rigor and high expectations become hopelessly distorted in the hands of well meaning but untrained educators. Gifted students fall under the category of special education for a reason: They are students with very specialized cognitive and affective needs that demand highly trained and competent instruction in order to achieve. Gifted children do not learn despite of what happens in the classroom; they silently languish in an environment of instructional abuse and cognitive dissonance when their needs are systematically ignored by those who do not comprehend them. Flexibility without clear parameters is tantamount to confusion and chaos in education, and will hurt the future of this state and ultimately our nation. It is our moral obligation to provide for those students who have the potential to make the most profound and dramatic difference in our state, country, and world--our gifted students.	10/30/2015 12:26 PM
275	The proposed standards are not written in the best interest of the students. The minimum number of minutes and no limits on group size will not ensure quality gifted services. Gifted services should be taught by a professional who has obtained a license in the area of gifted education. Overall the standards lack integrity in addressing the needs of gifted.	10/30/2015 11:55 AM
276	It is important that teachers of the gifted hold certification and course requirements to ensure proper education and strategies are used for the gifted child. It is also important that there is ongoing professional development for trained teachers of the gifted.	10/30/2015 10:44 AM
277	1. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 2. Incorporate data collection on specific inputs to determine effect of services. In addition, the results for the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 3. Reinstate service and staffing requirements that are in the current operating standards as stated in the service section. With the reinstatement of services and staffing parameters, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 4. Reinstate the district service plan as required by ORC.	10/30/2015 10:41 AM
278	I am a gifted intervention specialist, and I just had another round of parent-teacher conferences. Year after year I hear the same thing from the parents of many of my students. The regular classroom teachers do not provide enough challenge for their children (even though I know my colleagues in the regular classroom are providing some level of differentiation). They often say that their children comment that they do not learn anything new in school and that the only time of the day their minds are stimulated is when they come to my class. Gifted services provided by a gifted intervention specialist are a necessity.	10/30/2015 10:00 AM
279	Where is the funding for gifted education and for these students? How are districts supposed to meet these rules without money? Districts should receive additional funding for the two full grade identification and screening assessments required (in grades K-3 and 4-6) AND for each student identified and served. While not solely related to the rule, collaboration with those who set the requirements for undergraduate and graduate teacher licensure programs is necessary and there should be a required course Introduction to Gifted Education for anyone getting a teaching license in our state. We require an Introduction to Special Education course and a Diversity course; but neither of these address the needs of gifted and advanced learners in a way that prepares teachers to effectively meet these students' needs, or even understand these needs.	10/29/2015 8:06 PM
280	Do the operating standards include a requirement to serve gifted students and the funding to support the service? If not, the standards are useless.	10/29/2015 12:58 PM
281	The testing requirement in the proposed rule is excessive. The whole grade screening should remain a local decision like it is in the current rule. There has to be equal accountability to ESCs and districts for our students.	10/29/2015 10:40 AM
282	The wording of this survey was unfair and biased. I believe that another survey that is better worded needs to be sent out to get an accurate picture of what districts feel need to be in the Gifted Operating Standards.	10/29/2015 8:49 AM
283	Please maintain the local flexibility to define qualifications for teachers to instruct gifted students. This is a key issue in Districts having the ability to expand services for gifted learners.	10/28/2015 9:03 PM
284	There are many holes in the proposed rule. Understandably, flexibility is usually positive. However, these rules take away a strong foundation in order to grant flexibility to districts. Keep the foundation strong, and then grant flexibility to those districts who are properly providing gifted education. I fear that if these proposed rules are enacted, gifted education will be further diluted and reduced in Ohio. We will fall farther behind with this student population.	10/28/2015 9:00 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

285	I fear that the lack of specificity and the lack of accountability to hire highly qualified teachers to serve our students who are identified as gifted is going to be a real concern for our students. Also, there should be more specificity regarding how funding is spent and accounted for so that districts are truly using the funds to enhance the learning and development of our students who are identified as gifted.	10/28/2015 8:26 PM
286	WEPs or plans, much like an IEP, should be in place for each gifted identified student, to provide guidance for the classroom teacher. Is there any plan to look into co-teaching in a gifted classroom?	10/28/2015 6:41 PM
287	How could this proposal be made when it does not provide guidance to districts????? In the past few years, the field has started to become respected in Ohio but this will make us a laughingstock for the administrators in our districts. Get real and work with those in the trenches to develop standards that will help gifted students rather than hinder their progress.	10/28/2015 3:46 PM
288	While taking out "red tape" is necessary, providing a more structured framework for districts who have so many other directions they are working with professionals who are trained to work with these students is a must. Unfortunately, many times I am working with districts and they have done a disservice to their highest students, holding them back and then in the next breath complaining about our place in the international standings of students achievement. Either we need to focus on these students and provide them the opportunities they need or we just "roll over" and admit we care about the average success and not beyond.	10/28/2015 3:35 PM
289	It's time to make gifted identification, programming and service a priority in the state of Ohio. Everyone bemoans the "brain drain" that takes place. I can't blame them for leaving Ohio! Families of gifted children deserve the right to know their child is learning something new everyday, and being challenged to reach his/her highest potential. For many gifted children that is not happening. If you want future innovators, entrepreneurs, inventors, engineers, architects, lawyers, doctors, educators, etc. to stay in Ohio then we need to recognize the importance of educating this very special population.	10/28/2015 2:43 PM
290	Please do not accept these gutted "standards" that lack any quality of a standard for our gifted students! They deserve better and without a requirement from the state, may fall by the wayside in many districts that are struggling to meet their bottom line.	10/28/2015 12:55 PM
291	The proposed rule is entirely too vague, providing no real guidance for high-quality services for gifted students. This seems like a knee-jerk reaction in the opposite direction of the current Operating Standards, which, some argue, are too specific. The lack of guidance is a true step backward to the early days of gifted education in Ohio, and no where near the quality of some neighboring states. The proposal needs to include clear definitions of gifted intervention specialists, so that experts in gifted education are active in every gifted program. Students need gifted educators who are passionate about working with gifted students and feel confident in their ability to meet students needs. The most recent proposal will create situations where teachers may be forced into positions working with gifted students, even though they were not interested in serving this unique student population. While flexibility of service models is important in our diverse state, every gifted service should be valuable to gifted students and proven through the existing research. Experts in gifted education have already done this research, but the state of Ohio needs to acknowledge this body of work and take it into consideration. Living in Ohio my whole life, I have experienced the reality of being a gifted student, parent of a gifted child and teacher of gifted children. This proposal is vastly disappointing from all three perspectives. It is necessary for these standards to be infused with clear standards for excellence in gifted education.	10/28/2015 8:24 AM
292	I think it is very proactive and I hope that it is put forth. :)	10/28/2015 8:12 AM
293	I feel that parents should receive more information from the school district after their child has been identified as a gifted student.	10/28/2015 7:33 AM
294	No	10/27/2015 10:56 PM
295	Grrrr	10/27/2015 8:22 PM
296	Every student has a right to a great education that meets them at their development and pushes them to meet their potential...IEP, Gifted, ESL, 504, typical...	10/27/2015 8:08 PM
297	I am saddened that we are moving to such a vague and difficult to police gifted rule. As a parent, I am scared of what gifted service will be for my daughter. I have seen what our district has done to art and music and library when the restrictions were eased, they were either eliminated or reduced to the point where they were no longer beneficial. We cannot afford to let our most capable students fail to realize their potential. When we have lowered our gifted standards to less than is required in some of the lowest performing states then what are we saying about our priorities for education!	10/27/2015 4:11 PM
298	Not right now	10/27/2015 3:56 PM
299	Gifted Students don't always make it on their own, and have the right to learn something new on a daily basis just as any other student. They are being discriminated against, and it's obvious that a lawsuit could happen in the near future. Please consider the logical aspects of this whole situation!	10/27/2015 2:56 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

300	<p>I am a former gifted coordinator of Bellefontaine City Schools and retired this past May. As coordinator, I have watched with much concern the debate over gifted standards. I strongly believe that the most recent developments with the standards have not been done in "good faith" to meet the needs of gifted students. A lot of work has gone into writing the standards in the past using a wide variety of expertise. A few years ago, a committee worked very hard and had new standards ready to go -- very similar to our old ones, but more clear and concise. However, those seemed to have "been thrown out the window" and in it's place are new standards take out any hope of holding districts accountable to serve gifted students appropriately. It allows districts to set standards for who can serve and what those services can look like. I have been fortunate to serve under an administration and school board that values the needs of gifted, but I've also worked with many principals who do not. Using the standards and state rules has been the only way I could advocate to make sure the needs of these students are met. Those that don't understand and/or support the needs of gifted are very good at manipulating the use of staff and monies to meet their needs of getting all students to "pass their tests" rather than worrying about the fact that gifted students are wasting their time learning things they already know. There is now so much emphasis on testing and accountability to make sure our regular students and low performing students are being served and meeting certain goals. It seems that gifted students needs are being totally ignored. I believe that gifted students also deserve a quality education and it can be done in an economic and efficient matter if the correct rules and tools are in place.</p>	10/27/2015 2:06 PM
301	<p>This proposed draft is very disappointing and if adopted as is will most likely have a devastating effect on the gifted students of Ohio and the quality of instruction they receive. The proposed draft does not provide any clear guidelines as to the level of training provided nor by whom to the general classroom teacher.</p>	10/27/2015 1:54 PM
302	<p>Please reconsider this proposal. Gifted services need to be given the same attention as our special education programs if we expect these students to show the same growth. If we expect these students to be our leaders, then lets put some funding in this area so that schools can truly meet their needs. Regular classroom teachers are already exhausted from trying to meet the needs of regular students and the special education students in the same room. If gifted funding and expectations are not raised in Ohio, then the results will be little to no growth in these top kids at most.</p>	10/27/2015 11:35 AM
303	<p>More funding for gifted intervention is needed to support districts in their efforts to improve services and report card scores.</p>	10/27/2015 11:24 AM
304	<p>Districts are strapped for money. The proposed rule does not have any teeth. Without accountability, districts will move gifted funds to other areas. Our gifted students deserve to be educated and to learn something new everyday. This proposed rule will take away gifted intervention specialists and gifted coordinators from our students that are already given so little. Please support our gifted students and their need to learn something new every day!</p>	10/27/2015 10:52 AM
305	<p>There has to be a balance between quality service to gifted students and flexibility for the district to use limited resources wisely. I could live with this!</p>	10/27/2015 10:46 AM
306	<p>No</p>	10/27/2015 8:39 AM
307	<p>Gifted education in Ohio is severely underfunded. We believe funding should be based not only by those who are identified as gifted, but strong consideration should be given to funding schools to help with the identification process. Obviously we also believe funding should increase in order to serve those who are identified.</p>	10/26/2015 10:12 PM
308	<p>Keep on going. Make this strong and clear enough for teachers to use to make a real difference for students.</p>	10/26/2015 7:35 PM
309	<p>If it's not broken, don't change it! Loosening the current requirements will be detrimental for gifted students in Ohio. I feel the proposed changes are a travesty and they have become too politically affected. Experts in gifted education can more effectively determine what's best for gifted students; not politically-motivated elected officials who have had no experience in the field.</p>	10/26/2015 3:10 PM
310	<p>This draft for gifted standards was produced without any input from the field. There have been several other drafts which were written with input from all stakeholders. I don't understand why these quality documents have been discarded for this version. The process for writing these standards were neither transparent nor collaborative.</p>	10/26/2015 2:55 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

311	<p>I don't understand why gifted children and services continue to be looked at as another waste of district service, money, and time. If anyone knows anything about gifted children, it is that these children have same, if not, more social emotional, behavior, and academic needs as a child who has an IEP. We would not blink an eye to provide these students with the necessary measures to help them be successful, yet we stick our gifted children in a classroom and expect them to simply achieve because they are 'gifted' and supposed to perfect/smart at everything. What about children who are twice exceptional? What about children who suffer from asynchronization? What about children who struggle to fit in because their IQ is superior to their peers? What about children who act out in the classroom because they are bored and not being challenged? What about children who are underachievers? More importantly, who is going to finally be an advocate of these children? These children, in fact, do have special needs-despite what most may think. Imagine for a second, what these children could do and produce if they were allowed the opportunity to express and expand their minds to what they have the capability of. We hold high standards for achievement of our general education students. We even hold high standards for our low students-though modified. Why would we not hold high standards for our gifted students(which can also be modified from the standard general education form)?? We modify and offer many many interventions for every other student, why not for gifted students??? I know why-it implies more work. More work for the district, more work for the schools, and possibly more work for the teachers. So, let's get the appropriate training necessary to get meet the needs of these students and then it won't be 'more work'. It will be a part of the daily job of meeting the needs of all students. Stop devaluing and undermining these students and those who are already certified and trained in the the teaching and development of these children-who , by the way, are special needs as well.</p>	10/26/2015 2:48 PM
312	<p>Why does this continually have to be a fight? My students come to me for one day each week, the required 225 or 240 minutes. It works in our small rural school. Over the years, the teachers have come to appreciate the fact that they simply cannot do it all, and desire my help in challenging these children. They MUST focus on the middle of the road, and the under achieving students to bring them up to grade level standards. I can focus on the children at the higher end of the spectrum. They deserve the chance to learn something different, to dig deeper, to challenge themselves in an educational way. PLEASE, do not allow districts to save money by allowing all gifted education to be designed by individual districts. It will hurt CHILDREN.</p>	10/26/2015 2:35 PM
313	<p>This survey was poorly worded and could easily illicit unintended responses. Please use this opportunity to strengthen gifted education in our state instead of dismantling it.</p>	10/26/2015 1:23 PM
314	<p>Again, please ensure that students with IEPs or 504s have their goals, accommodations (including adaptive technology) follow them to their gifted classroom setting.</p>	10/26/2015 12:59 PM
315	<p>Make it more specific.</p>	10/26/2015 12:47 PM
316	<p>The questions asked in this survey appear to be designed to construct a pre-determined narrative which would support the proposed rule changes. With so much emphasis being place on raising test scores and bring the students that are below grade level, why is emphasis not being placed on those already at the top? Gifted students need support that they do not receive from their regular education classroom teachers. Eliminating the need for a Gifted Intervention Specialist is like eliminating the Intervention Specialist's in the districts. This doesn't seem to be happening, so the question is why is Gifted Education on the chopping block? The idea of Gifted students being smart and therefore not needing extra support is so far off from the truth. Gifted students often feel isolated and alone and therefore become depressed because of lack of support. Gifted Intervention Specialists are trained to provide this social/emotional support that is lacking. If left to the general education classroom teachers that have 20-30 other students that they need to lend support to (usually educational support) the gifted students tend to "slip between the cracks" in all aspects, educationally, socially and emotionally.</p>	10/26/2015 11:58 AM
317	<p>In general, the language provided here is too vague and sets up opportunities for districts to "phone it in" and not provide true service. At the same time, there is no language about how ODE will intervene when districts fail to meet the needs of gifted learners. Too much is left up to chance based on the new rules.</p>	10/26/2015 11:42 AM
318	<p>While the flexibility of the new rule is appreciated, the rule creates a situation where we can no longer compare districts to each other and assign a grade to them. If we continue to provide services via a best practices model and do not serve as many students but provide certified support, and another district does not do the same, we are going to receive a much lower grade on our report card indicator than a district who has made every educator a service provider. There has to be clear definitions of service.</p>	10/26/2015 11:28 AM
319	<p>There should be more funding for districts to implement gifted education.</p>	10/26/2015 10:56 AM
320	<p>These standards seem to be lowering gifted standards. Is that what's really best for our students? We can't just allow anyone to come in and do whatever they want when it comes to teaching our children and the funds used to teach them.</p>	10/26/2015 10:00 AM
321	<p>Any rule on gifted education should make it clear that the goal of the rule is to make gifted education available to the maximum number of students possible. Special attention needs to be paid to diversity of gifted students and alternatives to standardized test for students who have language or experience issues that make written test a poor indication of intellectual capacity for them. Teacher evaluation and recommendation should be included as a part of every schools identification process.</p>	10/26/2015 9:49 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

322	I am concerned that these revised rules are designed to diminish the quality of gifted instruction in Ohio. While the educational system may be strained, reducing the quality of these services will do great harm. My gifted child, before we began the gifted program, was bored and restless in class. He was frequently in trouble and fought over doing very simple homework. He had to argue with the teacher over his reading materials (she wanted him to read "on grade level" when he was far above it). Now that he receives gifted services, he has a teacher and peers that understand his needs and can help stimulate his intellect. His problems in class have all but disappeared and he is much happier in school. Without the gifted program he may have continued down a road of misbehavior or been labeled as ADHD and medicated. Please think hard before making these harmful changes.	10/26/2015 9:24 AM
323	The identification process is confusing and specifically what standardized evaluation tools should be used is also unclear.	10/25/2015 10:04 PM
324	I think it is very difficult to include gifted students in the value added category. Right now it is very difficult to show a year's worth of growth with a student who takes one test that is the determining factor of growth. Again there needs to be many measurable pieces that are included in determining a child's gifted abilities.	10/25/2015 9:24 PM
325	As a parent of a gifted student, the gifted program in elementary school was wonderful both educationally and emotionally. The gifted child had an opportunity to learn with students who were equal in ability. This allowed for much growth. Moving to middle school, the gifted program is not required or so the administration tells me. Yes, there is a program but not as solid as what was available in elementary. I would like to see gifted programs continue through all years of education not just elementary. Gifted students needs do not end once they enter 6th grade! I would like to see requirements that all gifted students receive the same amount of class time. In our district, due to transportation issues, my child misses 50 minutes of class time per week. In 36 weeks, this is 1800 minutes or 30 hours of class time over the year. That is like missing ONE FULL week of school!! My child is given work to complete as homework or on the bus. She is missing out on classroom time and work that is counting as a grade. My fear is that differentiation is going to be allowed to replace gifted services. I am watching teachers showing power point lectures so that all classes can receive the same lesson. Students can work ahead or review for the differentiation. Teachers are no longer teaching the class. Teachers are becoming monitors in the classroom. Do not allow the gifted program to become a room of computers where the teachers are merely a babysitter for the children!! Let the teachers continue to do what they do well -- TEACH!	10/25/2015 8:54 PM
326	Please consider why you are proposing such a plan for the education of our gifted students. Do these students matter to our Ohio Department of Education? I feel that the changes will cause a negative impact on these students and it is completely unfair.	10/25/2015 8:08 PM
327	This proposed rule eviscerates the current gifted standards. If it were not for the current standards my son would not be receiving the services he is. The standards as they are currently at least give we parents a fighting chance at getting our children what they so desperately need to succeed.	10/25/2015 7:17 PM
328	points for early identification is not a wise practice-encourages mass testing too young more local control no tie to grade card	10/25/2015 1:17 PM
329	I have difficulty understanding why its so tough to put appropriate services in place for these bright, creative, sensitive and interesting young people? Gifted students fall on the right side of the bell curve in the area that special needs students fall on the left side. All you really have to do as rule makers and overseers for our children is use the rules that exists for IEP/504 and special needs students as a template and duplicate it for our gifted young people. Let me know if I can be of assistance. Heidi Sommer McAlister, MEd., LPCC The Sommer Group - Counseling & Consulting 94 Northwoods Blvd Columbus, OH 43235 (614)985-5500 www.thesommergroup.com	10/25/2015 12:00 PM
330	None at this time.	10/24/2015 9:23 PM
331	Don't change the proposed rule anytime soon. Let parents and teachers have some significant time to adjust. Anything in Education takes at three years to get good!	10/24/2015 5:50 PM
332	Allowing districts to determine who is qualified to teach gifted students makes no sense. ODE requires teachers to be certified in the grade level they teach and the content area they teach. They require that teachers have specific training in the type of development to expect from the students as well as what specific content they will be covering. Why would you get rid of those same expectations for gifted students? They deserve someone who has had specific training in how they learn, what social and emotional issues they bring to the classroom, and how to challenge them best.	10/24/2015 5:31 PM
333	Nice to see that something is finally being done for these students.	10/24/2015 2:23 PM
334	Gifted students are our future innovators, creators, and problem solvers. If we gut services for them, we risk losing them boredom and mischief. we are shooting ourselves in the proverbial foot. If we want to keep productive Ohioans in Ohio, we have to give them a reason to stay!	10/24/2015 12:27 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

335	<p>Yes I do. When the current rules were put into place 5 or 6 years ago, my district was forced to eliminate our gifted services in English Language Arts in our elementary schools. Our parents liked the services. Our kids benefited from the services and our teachers did a great job with the identified kids. Then the state came along and in the spirit of making sure that our kids were being "appropriately" served, they forced us to cancel a popular program because we couldn't afford to abide by the letter of the regulation. You have an opportunity to undo that injustice with this new rule and you should take it. The bottom line is that the harder you make it for districts to comply with any voluntary state mandate, the higher the likelihood that districts will simply refuse to provide the service. Six years ago, this had exactly the opposite effect from the one the state intended and a generation of kids that could have received specialized instruction did not. That's a pity. The more flexible you make the rule, the more kids will be served. That's a truism and it's what is best for Ohio. Thanks for listening.</p>	10/24/2015 11:24 AM
336	<p>Unfortunately, the questions asked in this survey appear to be designed to construct a pre-determined narrative which would support the proposed rule changes. This survey fails to ask some of the questions necessary to get true feedback regarding the gifted rule. The proposed rule obliterates all standards of quality service so it is impossible to answer the question "The proposal rules provide flexibility in how districts may serve gifted students." The survey fails to ask the real question of whether the district is expending funding appropriately on gifted students as required by ORC so it is hard to answer the question "The proposed rules outline the district obligation to report on funds that support gifted education annually." The survey fails to acknowledge that gifted staffing qualifications are eliminated for districts so it is hard to answer the question "Gifted staff qualifications for educational service centers that receive gifted unit funding are clear." Also, as the proposed rule renders much of the gifted indicator useless, there will be no true evaluation of gifted services in the proposed rule.</p>	10/24/2015 10:19 AM
337	<p>It seems weaker than the current rules. Being a parent of three gifted students I have seen, first hand, the lack of the school district administration to service gifted children. I have seen first hand how Districts punish gifted students by persuading them not to participate in post secondary classes, or try to deny authorized classes. I have seen how Districts idea of servicing younger students, is done in the classroom by having the gifted student "HELP" those other classmates who seem "not to get it". Or refusal of students to subject level accelerate in grade school, junior high, or even high school. For example students who are already familiar with a foreign language, the school will 'force' a Spanish student to take Spanish 1, and 2 to meet the schools 'requirement of two levels of a foreign language'. Instead of allowing students to take AP level and using credit flex to get credit for previous levels based on their performance at a higher level. Same with junior high students capable of taking High School level courses, the school doing all in their administrative ability to dissuade a student to personally work at the higher level they are capable of working at. I would love to share all the other items, like refusal to let parents of 8th through 11th grade student know about college level courses a student can take the next year, OR credit flex programs that can help students accelerate and work at the challenging level they often need for individual growth.</p>	10/23/2015 11:55 PM
338	<p>As a parent of 2 gifted teenage boys, I hope the state reconsiders the language in this proposed rule. The input of gifted professionals from across the state who know best practices and what measures are needed for accountability should be taken into consideration. Districts should not be left to their write their own guidance, they generally have limited funds and history shows they will use that funding elsewhere. My oldest son, 17 next week, although identified gifted in superior cog, math, science and social studies has never formally received services. It's such a tragedy that these highly intelligent students sit bored in the classroom. I have advocated on his behalf for years, but there is only so much that one parent can accomplish. We now have a gifted parent group that is advocating at the district level. But, my hope is that the state will take measures to standardize service and accountability across all districts in Ohio. As a gifted student myself, I find it discouraging that I had a better service model 30 years ago than my children do today. Ohio is going backwards, not forward and this proposed rule is definitely another step in the wrong direction. Thank you for considering my comments.</p>	10/23/2015 10:40 PM
339	<p>More specific parameters for identification, implementation and funding need to created to truly serve gifted students</p>	10/23/2015 7:59 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

<p>340</p>	<p>The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio.</p>	<p>10/23/2015 5:32 PM</p>
<p>341</p>	<p>The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio.</p>	<p>10/23/2015 5:15 PM</p>

Feedback Survey on Proposed Operating Standards for Gifted Education

342	<p>The specific general language that currently exists in the current operating standards has been removed. This language is necessary to ensure that districts follow best practice and meet the letter and spirit of ORC. Whole grade testing has been expanded, however the language can be improved to improve testing in early grades in a more effective and efficient way to support the identification of under-represented student populations. The proposed rule eliminates all quality parameters for service including caseloads, minimum levels of service, and even the definitions of service itself. There are currently 22 EMIS codes with a wide-variety of service options for gifted students. These draft standards would limit the options to three and essentially destroy any ability to determine which services are effective and which are not. Services could be as little as 15 minutes a week taught by a general education teacher with no gifted training. In addition, the proposed rule eliminates gifted staff qualifications in the current rule which are based on national and state licensure standards in favor of "district-determined criteria." ODE does not allow this for any other student population. This will effectively eliminate trained gifted staff in many districts in favor of general education teachers who will be provided with so-called high quality professional development. Recent survey data indicates that for most general education teachers this amounts to fewer than five clock hours per year. The proposed rule would allow districts to define services, define who is qualified to provide services and thereby allow districts to substantially define their own output that measures their performance. It turns the gifted performance indicator into a useless measure, but more importantly it undermines any standards for appropriate services to a vulnerable population. The end result disempowers parents and the general public to determine which districts are providing effective gifted services. Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio.</p>	10/23/2015 5:09 PM
343	<p>The proposed rule is going to allow districts to "water down" gifted services for reporting purposes to "look good" on state measures, and this is going to negatively impact gifted learners, their value-added growth and performance, and overall instruction for gifted students in our schools.</p>	10/23/2015 5:01 PM
344	<p>I think it is an area that needs to be focused on!!</p>	10/23/2015 3:41 PM
345	<p>Again, where is the previous standards/rules, etc? On face value this looks super but that's b/c the actual CHANGE in the rule isn't shown.</p>	10/23/2015 3:01 PM
346	<p>Public should made aware not only of how much money was spent by the District on gifted identification, gifted service, but also how much money District received because declared they have gifted students. I think there should be a voice to know how much money was spent to impede a student to be identified or receive certain services and take advantage of parents ignorance of the law. It should be transparent that Districts are really spending the money on serving the gifted instead of using the money for something else.</p>	10/23/2015 2:56 PM
347	<p>Gifted children deserve to be treated as a special population of learners, and be adequately funded and taught by professionals that are licensed to teach them. No other group of learners are taught by people that do not have the proper training and licensure to teach them. Additionally, monies that are allocated to gifted services should go to gifted services. Gifted children from wealthy districts should not have better services than children from poorer districts, just because the money is being spent in different ways. The gap between achievement will continue to grow.</p>	10/23/2015 2:23 PM
348	<p>Cutting the rule from 14 pages to 2 and 1/2 pages does not make it easier to follow or understand. Anyone new to gifted education would have no idea how to proceed in order to follow it. It is important that persons offering gifted services have gifted certification or courses..this really is not specified where it needs to be specified. There needs to be a list of what is considered a gifted service, how much time needs to be devoted to that service, how many students a GIS may serve at any one time. I have mentioned other areas that are lacking. Yes, the rule could be condensed, but not like this proposal. It is condensed to the point of being entirely useless.</p>	10/23/2015 2:18 PM
349	<p>Go back to the drawing board! Maybe the 15-page guidelines needed a trim-down, but you've hacked it down to something that paves the way for inconsistencies and non-accountability. You've essentially removed all minimum requirements for identification, service, teacher qualification, and funding oversight. In the name of "local control" (which theoretically sounds great) the ODE has stripped away the basic framework for gifted education and left it up to each district to determine what gifted education is. These students are all working toward the same real-world. How they get there matters. Their educational opportunities matter. How public schools best serve them can't just be a broad idea left up for interpretation from year-to-year.</p>	10/23/2015 1:56 PM
350	<p>Overall a wise streamlining.</p>	10/23/2015 1:28 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

351	<p>Is this another unfunded set of services that will stretch an already slim budget in school districts in order to comply? In my opinion, if gifted services are going to be viewed in a similar fashion as special education services then they need to be funded as such in order to provide a quality program for those students. Continually asking districts to do more without providing adequate funding is a travesty, an unfair expectation that short changes the accelerated youth in our society. If the belief is that these students will succeed regardless, then why create a set of reporting rules that will tax our budgets. If the belief is that we are not providing rigorous and challenging material for a group of students who at times appear bored or uninterested in the standard education that they are receiving, then provide adequate dollars to offer enriching programs that will stretch their minds and engage them in real academia.</p>	10/23/2015 12:02 PM
352	<p>Please reinstate the gifted service plan as required by ORC.</p>	10/23/2015 11:10 AM
353	<p>I really hope that we can get more serious about gifted education in our State. Just identifying and assessing students should not be enough. We don't say that districts should identify and assess special needs students. We require that those children be served. Then why do we allow the districts to get a buy in serving gifted children? All educators need to get some education on gifted students so that they are not loathing the children who need these services! As a State if we want to continue to make economic progress we can't ignore our gifted students. If we continue to treat services to them as an afterthought we will continue to see a brain drain from Ohio.</p>	10/23/2015 10:56 AM
354	<p>Gifted administrators in districts across the state have worked long and hard to help enforce rules for service and identification since 2008 when the first standards appeared. It is not always popular with higher level administration. This looks like superintendents wrote the rules to have staffing flexibility to do carte blanche. Students will be the ones who pay the penalty. There needs to be some service requirements, time, location, frequency. There needs to be a definition of preparation of general education staff to work with gifted students. There needs to be more encouragement to do acceleration, whereby the state testing rules usually put districts in the position of not wanting to accelerate students academically. Where do parents have any say in this? This looks like a giant step backwards.</p>	10/23/2015 10:42 AM
355	<p>Anything ODE is involved in requires unfunded mandates and additional burdens on school districts. Data collection for the purpose of collecting data without a plan to use data for improvement is only for justifying a position at ODE.</p>	10/23/2015 10:28 AM
356	<p>Please provide language addressing length of gifted identification, (life, two years, etc) and any requirements for requalification.</p>	10/23/2015 10:21 AM
357	<p>Gifted Education should fall under the umbrella of Special Ed. Gifted students have needs that are different from typical students, just like learning disabled children. They have special needs that require special services. These services should be held to the same standards and regulations as all other special services.</p>	10/23/2015 9:00 AM
358	<p>Am very interested in the summary feedback</p>	10/23/2015 8:47 AM
359	<p>Funding accountability is referenced several times in O.R.C. including sections 3301.07, 3317.022, 3317.051, and 3317.40. Taxpayers and parents have a right to know that the funds allocated for this population are being spent to serve them. Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that serving these students is not a priority for Ohio. If funding is not addressed, JCARR may reject this rule given the letter of legislative intent on this issue from Ohio House Speaker Pro Tempore, Rep. Amstutz, who verified that funding for gifted students should be spent on gifted students.</p>	10/23/2015 8:11 AM
360	<p>Gifted kids have the right to be educated in the least restrictive environment for them. A student who has an IQ which is 30 points above average has a right to special services every bit as much as a student who is 30 points below average does. The services need to be mandated as they are for special ed kids. They need to be educated alongside other high functioning students. They need pullout services with qualified intervention specialists. They need teachers who aren't trying to bridge an 80 point IQ span in their classrooms. That level of differentiation is not possible. Teachers don't want to admit that, but it's true. What happens in the gifted kids' needs get ignored. There seems to be an attitude with gifted education that, "Those kids will be ok on their own because they're smart." The reality is that these kids are getting left behind as we teach to the middle and try to pull up the low kids. We are at the race track and we're betting all of our money on the mediocre horses instead of the fastest ones. These are the kids who will innovate solutions to our future problems and cure diseases, but we're not investing in their and our future by mandating services which will keep these kids moving forward. We do this at our own detriment.</p>	10/23/2015 7:40 AM
361	<p>It is imperative to provide specific guidelines for servicing our gifted population. Too often, the focus of our instruction is on the students who are below grade-level and the students who are above grade-level don't get the specialized instruction they deserve. Lowering our state standards of service will only make this problem worse. It is also important to note that students identified as gifted have unique social and emotional needs. These can often be better addressed by a trained GIS in an appropriate service setting.</p>	10/23/2015 5:45 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

362	<p>This survey was poorly written and very biased. It appears to be written with the intent of getting the reader to agree with the proposed draft. For example the phrase "The proposal rules provide flexibility in how districts may serve gifted students" is misleading. When the draft tells the district that it can decide that whatever it wants is a gifted service, can that really be defined as providing flexibility or is that just the state abdicating any desire to provide guidance and consistency in programming across Ohio? Some specifications need to be in the Operating Standards to safeguard opportunities for gifted students who may be enrolled in schools with few identified gifted students or in schools with tight financial concerns. Some minimum time requirements for a gifted service are needed, as well as the need for providers of the gifted service to have some training in gifted education. I applaud the attempt to provide consistency in gifted identification by requiring two grade bands of testing requirements. However, testing students in K - 3 in specific content areas often shows results that are reflective of the educational richness of the child's home life. I would suggest a superior cognitive test in K - 3 and a superior cognitive test and an achievement battery be required for grades 4 - 6.</p>	10/23/2015 12:42 AM
363	<p>We must reconsider what is gifted, is it high achieving or is it gifted? With the last addition and this current addition, we will continue to see districts put up students who are high achieving as gifted rather than students who truly are gifted. Thus making the services inappropriate as high achieving students are unable to meet the demands of 'truly gifted'. We need a return to looking at IQ AND content specific- the OR statement allows for a dilution of the definition. As we continue to look at gifted as subgroups in testing, this is a major issue. Students who are high achieving are not gifted yet the current allows for these students to be mislabeled. Please consider the return to the AND version of identification for gifted as a state issue rather than a district decision.</p>	10/22/2015 9:28 PM
364	<p>Our educational support of kids working hard, naturally talented or gifted, and reaching high levels of academic success are not getting the proper support, resources, and funds to help promote their continued growth and special needs. As a parent, I find little to no help from our schools in providing guidance and assistance with my children who are gifted. Where is the public resources to help these children? I find this survey pre-paved in directing a specific outcome. The proposed rules obliterate any standards of quality so it impossible to answer some of these questions. This survey failed to ask the question of whether the district is expending funding appropriately on gifted students as required by ORC. The survey fails to acknowledge that gifted staffing qualifications are eliminated for districts. There seems to have no real evaluation of gifted services in the proposed rule and this survey failed to acknowledge that the new rule would render the gifted indicator useless, thus a true evaluation would not be possible. We are not supporting our youth and securing our futures by giving less to our gifted program. They are a special needs group that require more attention and services than most, but the investment in this group has great paybacks for our communities, business, and country. We want a better educational system, yet undercut our brightest and most talented. Capable does not mean they've met capacity....these children and their parents need more from their schools to continue to grow. Please support funding, staffing, and resources to see where our next generation can take us.</p>	10/22/2015 7:22 PM
365	<p>What about the amount of time required to count as a service? Currently it is 225 minutes per week at the elementary level. Do these operating standards eliminate that?</p>	10/22/2015 5:51 PM
366	<p>You should be ashamed of the clear bias in this survey. Also, an additional choice should be included on the first page for "Local School Board Member" - of which I am in addition to being a parent of three gifted students.</p>	10/22/2015 4:57 PM
367	<p>This survey is meaningless without a comparison to the previous rule or any context provided. I hope this survey is not being presented as some form of parent or stakeholder engagement; standing on its own it has no value.</p>	10/22/2015 4:13 PM
368	<p>Please do not require districts to do more testing of students. The state has taken steps with the next generation of assessments this year and peeling back the amount of testing time, etc... so teachers can teach and students can learn. Please don't add more required testing. Also, please keep WEP requirements basic so teachers are not caught up with paperwork; would rather have them creating quality lessons which benefit gifted students.</p>	10/22/2015 4:03 PM
369	<p>I hope that these proposals hold the local school districts accountable to serve these children, regardless of their age. It seems ridiculous that a child who scores a perfect score on the state OAA test cannot have their educational needs met. But the child who struggles can utilize all sorts of funding from the school and state. Both ends of the spectrum should be serviced to the extent that it meets the needs of the child.</p>	10/22/2015 3:20 PM
370	<p>I filled out this survey earlier, and provided input in regards to how the questions were phrased and the format used. Please use these new answers in lieu of my former ones. Unfortunately, the questions asked in the survey appear to be designed to construct a pre-determined narrative which would support the proposed rule changes. I'm displeased with the nature of the survey as it currently stands. I hope that ODE, or whomever designed this survey, will strive to design a more balance survey tool in the future. Thank you for your time and consideration.</p>	10/22/2015 3:01 PM
371	<p>This proposal makes a mockery of the needs of Ohio's gifted children to receive a quality education, and provides parents with no recourse to require districts to provide appropriate services. While the current operating standards can certainly be improved, they should not be obliterated in favor of a weak and ill-defined document that gives districts free reign regarding the education of this subpopulation. This proposal fails to provide any protection for gifted children and can only serve to make the current state of gifted education in Ohio even worse. Please revisit this proposal to invest the time, energy and expertise necessary to develop new standards that adequately address the needs of gifted children to receive the best possible education Ohio's schools can provide.</p>	10/22/2015 2:58 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

372	<p>This rule basically eliminates any specific, measurable standards for gifted education in the state, as well as accountability for districts to ensure that service is being provided. It is a travesty. Ohio Department of Education, you have confirmed my worst fears. Our culture as a whole can accept and celebrate giftedness an athletics, the arts, entertainment...everywhere except in the classroom. I am shocked and saddened to see that you apparently buy into this too. The idea that gifted students "are fine" and do not have a special educational need shows complete ignorance on the part of the general public, and also your part. The message that you are sending with this total watering down of standards is that our highly able students are not worth the state's or the districts' time or money. SHAME ON YOU. I grew up as an identified gifted student at a time when the only service available was grade acceleration. I taught myself to read at the age of four, and was able to decode the school psychologist's college-level texts by first grade. In kindergarten, I was actively bullied by my general education teacher for being a "know-it-all" who "had no business knowing how to read." (She said this to my mother.) Being accelerated a grade did nothing for my academic boredom and was a social disaster, as I was the smallest in my class, was painfully shy, and wore thick glasses. I was physically and emotionally bullied until I was in high school for being "different," liking to read, and using "stupid big words." I did not come out of my shell socially until midway through college. Academically, my grades dropped as my courses became more difficult because I had never been challenged and did not know how to work hard. Thankfully, I was able to find a small college where I was valued for who I was and where my talents were nurtured. I graduated second in my class. As an adult, my career goal - no, passion - has been to provide the educational services that I (and my husband) craved but did not receive as children. As a teacher of a self-contained gifted class for the past 13 years, I have been able to live that dream. I knew that I had achieved my goal with my first magnet class when a girl new to the program came to me on her third day of school and said, "I love this place! It's not boring - the kids in class talk about such interesting things all the time. And nobody thinks I'm weird here - I belong!" That dream is being taken away from me AND my potential future students next year as our district dilutes and restricts gifted services. As a parent of two students who were fortunate to have gifted magnet classes in elementary school (now in the process of being phased out), honors sections of core classes in middle school (potentially on the chopping block), and numerous AP and post-secondary options in high school (becoming more restricted), I have seen how this programming contributes to the children's ongoing success. I especially cannot say enough about the dramatic effect such programs have on our young girls. They create strong, confident, young women who resist peer pressure, are not afraid to take challenges, and have the ability to compete in traditionally male-dominated professions - this in spite of a national culture where physical appearance and attractiveness to men define female success. I would hate to see this support system removed. In other countries, these students are routinely supported with special academic programs and special schools. With all of the concern about America's loss of its competitive edge in the global market, how is it in any way defensible to CUT services to these children? And that is exactly what your proposed "rules" are doing - cutting services. What are you doing to Ohio's future? What will happen to our potential future scientists, researchers, financial experts, political leaders? SHAME ON YOU. Shame on you, too, for creating a survey such as this that is obviously designed to elicit answers that support the rule change. Absolutely indefensible. In closing, I beg you reconsider not only the implications of "No Child Left Behind" but of "No Child KEPT Behind." Both are equally critical to our state's future.</p>	10/22/2015 2:43 PM
373	<p>I am a GIS in a very small school. So small, in fact, that compliance was never mandated (not enough minutes allocated to serve the students every week), but compliance was an honor and my duty. Our school has gone from no program at all to a successful, competent enrichment program because of the Operating Standards. It has been a privilege to fight for these special students who need to be challenged and rigorously engaged to meet their learning potential. Would you want your bright and able son or daughter, or grandchild denied the benefits of a well educated instructor who understands their way of thinking? There literally is no time in the day for a regular classroom teacher to provide these needs.</p>	10/22/2015 2:40 PM
374	<p>You must ask educators and parents of gifted children, who work with them every day, to really know what changes might or might not be needed.</p>	10/22/2015 1:55 PM
375	<p>Please support gifted education and give it the funds needed to meet the needs of these students. I strongly believed the reporting should be on the grade cards. We must meet the needs of these students in Ohio! Students need to be clustered grouped in the classroom too.</p>	10/22/2015 1:05 PM
376	<p>I believe this survey was created to intentionally make the rule look positive for gifted students when it is clearly a detriment to the students by disempowering both ODE and the State Board.</p>	10/22/2015 12:29 PM
377	<p>These rules will provide a dis-service to our gifted students. Gifted students are the future Steve Jobbs, etc and these new rules will hold them back from finding their greatest potential.</p>	10/22/2015 12:23 PM
378	<p>I am happy to see work being done in this area. It is desperately needed for many of the districts in the state of Ohio and nationwide. Thank you!</p>	10/22/2015 12:11 PM
379	<p>Why are you throwing out the baby with the bath water?</p>	10/22/2015 11:59 AM
380	<p>It is obvious in the proposal that it is a "watering down" of gifted services within the state of Ohio.</p>	10/22/2015 11:43 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

381	The rule states that services shall be provided in areas of identification. Our district identifies cognitive and specific academic areas but uses the 95% percentile of the TOTAL score for which include a composite of reading, language, and math. You may want to address this to be specific.	10/22/2015 10:46 AM
382	To borrow and paraphrase a line from a rather famous movie involving pirates: they're really 'more what you'd call guidelines than actual rules...' Such guidelines help districts be more flexible and consider services/supports within the frameworks they already have established. They are also incredibly unhelpful in clarifying what minimum services actually will be so that districts across the state are comparable. Rules should establish clear thresholds that one could create an implementation checklist around and judge whether it meets the criteria or not. The checklist I am imagining for this "rule" would still be remarkably open to interpretation and, therefore, inconsistency.	10/22/2015 10:28 AM
383	Please do one of the following two things so that students who are identified as gifted get the services they deserve (it is required by law for special education, it should be required for gifted). 1. Students who are gifted must receive services from a GIS. Under law each district must have a GIS and each gifted student must have a WEP on file. or 2. Districts have the flexibility to determine who within their district would be the best service provider/s for gifted students and can count a student as served, if they submit the teacher's credentials and a description of the specific services provided. Each gifted student must have a WEP on file.	10/22/2015 9:52 AM
384	I believe these proposed rule will destroy gifted education. We believe that all students deserve an education to meet their need. Gifted students have needs beyond what the regular classroom provides them with.	10/22/2015 9:42 AM
385	None	10/22/2015 9:29 AM
386	I think I had posted my concerns at this time.	10/22/2015 9:25 AM
387	As a teacher in a district that gets "dinged" each year for not servicing our G&T kids beyond 6th grade, I think this is necessary and is much appreciated! I look forward to hopefully having the opportunity to work with those students in a classroom setting beyond just my honors content class. In addition, it should also specify that a student who is homeschooled should have to report to their "home" district for testing, and make sure that parents know that they can't just decide their child is gifted, as we experienced over the summer.	10/22/2015 9:07 AM
388	This is my 29th year of teaching gifted students. I began my career in the reg ed classroom but had numerous gifted students in each class. I recognized early on these students have a set of needs that can and should not be ignored. For 13 years I taught a pull out program for grades 3-6 then co- taught advanced Reading and Math for 3 years. Finally I got back into the regular classroom where gifted students are clustered. This clustering has significantly brought up test scores, kept parents and students in the district and have allowed for instruction to move at a pace appropriate for advanced learners. Frankly, I am shocked the state does not seem to understand intelligence must be nurtured. Many have the perception if students are smart they have no needs which can't be further from the truth. I am committed to high quality education for all students. Are you?	10/22/2015 8:34 AM
389	Once again, I would like to see more in place for the gifted students who attend private/Catholic schools. Many of the schools do not offer any kind of gifted program, which is a detriment to our gifted students who attend these schools. I would like to see these schools held to the same standards as public districts. If the schools get a subsidy from the state through ASP funds to help pay for reading specialists and speech therapists, why shouldn't they have to provide gifted instruction for their students? We do so much to help the kids on the low-end of the learning spectrum, why can't we work just as hard for the kids on the upper end of the learning spectrum? These kids shouldn't be penalized because they don't go to a public school that is required to offer services. All schools should offer the services regardless if they are public, private, or charter.	10/21/2015 10:44 PM
390	In practical implementation, it is EXTREMELY IMPORTANT TO COORDINATE THE REQUIRED NUMBER OF MINUTES OF GIFTED SERVICE WITH THE NUMBER OF MINUTES REQUIRED BY THE STATE FOR THAT SUBJECT. Do not say "225 minutes". Example: If the state requires 42 minutes/day in math, then the gifted services minutes for math would be 42 X 5. If the state changes that to 43 minutes/day in math, then the gifted services minutes would change to 43 X 5, etc. (This will make scheduling so much smoother and will be better supported by the classroom subject teacher. An English teacher resents it when a student misses her class to work the extra minutes in math.) Also, gifted identification in social studies, science, and writing does not seem to be as accurate as that in math and reading.	10/21/2015 10:22 PM
391	In the past, there was strict language about the number of minutes that are necessary to be considered as providing services. I did not see this language. Are number of minutes eliminated or open to LEA determination?	10/21/2015 9:54 PM
392	It would be helpful if there was a minimum requirement of provided services k-12.	10/21/2015 9:41 PM
393	when parents have to pay for multiple field trips for their children in the gifted program, it is a punishment	10/21/2015 9:39 PM
394	I do not have any additional comments at this time.	10/21/2015 9:35 PM
395	There seems to be quite a bit of the old rule that has not been addressed in the new rule. For example, the definition of "gifted" and how students will be identified (what score will be used) has been deleted.	10/21/2015 9:07 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

396	Although it is important to give districts flexibility to determine what their gifted program will look like- it would benefit the gifted learners if there was some kind of a requirement as to how many hours each week gifted students must be served in order to make sure they are getting their needs met on a routine, consistent basis. Without this students may only be served by some kind of guidance meeting two times per year and this would count as their gifted service. This would not be as supportive as a daily or weekly service, especially one by a certified gifted teacher who understands their needs.	10/21/2015 9:03 PM
397	Classroom learning is very important. Students should be learning with their peers in an engaging and safe environment. Students that need special services, across the spectrum, should receive those necessary services. They should be with their identified classroom when they are not in need of special services. A child needing reading intervention, a child needing math intervention, a child qualifying for something gifted - they all should get the services that they need. They will make gains in their special services classes as well in their classroom if everyone works together for the common good of all students. To just identify and then work with those identified in a flexible manner, seems to water down the scope of what really could be going for those identified students. Only those students that go to a school that can provide them a real gifted English class or a real gifted Math class will fully benefit.	10/21/2015 9:02 PM
398	I noticed there were no required number of minutes for service. I realize this has been about identification so far, but the 225 minutes requirement needs to be addressed. I feel we could serve more gifted students within the hours of a week, if we did not have that minimum requirement. There needs to be some give and take of at least 15 minutes. With recess, lunch, related arts, and counseling services, and other gifted served classes, and sometimes students who are learning English as a secondary language, there are conflicts with trying to squeeze that much time out of the week.	10/21/2015 7:42 PM
399	Please don't do to gifted programs what you've done with charter schools. Please keep students at front of mind in developing policies for them, and please don't cut these programs or allow programs that don't serve students to hide because of a lack of transparency.	10/21/2015 7:32 PM
400	Would be interesting to know where this proposed rule actually originated. I find a lot of problems with the rule. It appears to exclude artistic students and or fails to show importance to the arts. Gifted students shouldn't be punished with more math and science assessments.	10/21/2015 7:22 PM
401	I am deeply frustrated with the proposed rule as both a gifted intervention specialist and as a former classroom teacher. I have always advocated for the best possible education for ALL students and I feel this new rule is lacking in many ways. I urge the writers and other stakeholders to confer with specialists, coordinators, the OAGC and parents who are familiar with gifted services to reform the proposed rule before gifted students suffer.	10/21/2015 7:22 PM
402	Please keep case load, service minutes and teachers gifted certification requirements in the new operating standards. As a gifted administrator, these requirements are difficult to figure out; however, it forces building administrators and gifted coordinators to think out of the box, and persevere to a solution that provides quality gifted services for kids. Without these requirements, it will be tempting to avoid the difficult (complex scheduling) solutions that often benefit the adults in the buildings.	10/21/2015 7:13 PM
403	It is this kind of stuff that makes one want to leave teaching.	10/21/2015 6:28 PM
404	Services need to be better defined. Also, the funding for gifted must be tied to proof of services given by gifted intervention specialists specifically to students with gifted identification.	10/21/2015 6:26 PM
405	I want to see more info regarding twice exceptional and see more funding for gifted services	10/21/2015 6:12 PM
406	Survey questions are biased towards the proposed rule. Proposed rule will harm students who are gifted. If nothing is required as a service, anything could be called a service, regardless of whether it actually helps gifted students. If no one is required to have special training to teach gifted students, unqualified personnel may end up teaching them--to the students' detriment. Districts need to be held accountable for gifted funding. Does Ohio care about all students? Based on the proposed rule, it's fairly obvious Ohio doesn't care about its gifted population.	10/21/2015 5:45 PM
407	The proposed rule is nebulous and full of loopholes to allow districts NOT to serve its gifted population! The proposed rule is summed up in its first statement, paraphrased per my interpretation: Gifted students will be guaranteed MINIMUM standards.	10/21/2015 5:26 PM
408	Good start; parent support will come when they are aware and educated about student needs!	10/21/2015 5:02 PM
409	As a parent of a gifted child and as an educator of gifted children, these proposed rules are terrible and do a disservice to gifted students. Gifted students require specialized services provided by a gifted intervention specialist just like a special ed student requires the services of an intervention specialist. If these rules were proposed for students on IEPs, there would be an outcry. This document is flawed and exists primarily because districts are struggling to meet the scores on the state report card, not because they improve gifted education. I am appalled to live in a state where gifted students in public schools receive so little. The state should be ashamed of itself. It is failing students - AGAIN!	10/21/2015 4:55 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

410	It would be wonderful if districts offered gifted classes for all identified students in all grade levels. Unfortunately, many only offer gifted classes for certain grade levels or have a pull-out session a few times a year for the gifted students. Gifted students have long been ignored by districts; it's time that districts focus on serving this population of students. After all, these are the kids who will be running our communities one day. They need all of the educational opportunities possible!	10/21/2015 4:44 PM
411	I think the accommodations should be more specific, especially with regards to grouping, clusters, pull outs,etc.	10/21/2015 4:37 PM
412	With the focus on getting kids to pass tests lately, the gifted kids' needs have been forgotten. We need to bring back funding for gifted education or we will watch our brain trust wither away. Teachers are not motivated to get certification in gifted ed because there is no opportunities for advancement there. We need to turn that around. As a mother of two children that went through our gifted program and are very successful adults, I was glad that my kids' needs were met by our school system. We need to make it a priority again.	10/21/2015 4:34 PM
413	Where is the increased funding for this plan to be carried out coming from? How is ODE, through the legislature, moving to ensure adequate funding follows the changes and mandates for such? Where/how is the time for the testing going to be taken from? It seems that, while the new Operating Standards for Gifted Education make sense, it doesn't address the time/funding/training/sustainability of programs needed to support the Operating Standards.	10/21/2015 4:22 PM
414	Gifted students need time weekly, if not daily, to be with other gifted students and a trained gifted Ed teacher who values and understands and utilizes their giftedness. Those who are not highly successful academically need continued support in secondary school. Those who are academically successful need guidance in planning for the immediate and distant future and need classes with sufficient rigor - work through higher level material faster or in greater depth.	10/21/2015 3:59 PM
415	To change the operating standards from 15 pages of guidance to 2 is ridiculous in an age of accountability that includes a NEW gifted measure on the state report card. How can ODE consider dismantling gifted education services, which were already NOT supportive enough, to be even weaker!?	10/21/2015 3:45 PM
416	Does it provide enough direction, funding and funding description of allocation for school districts to feel obligated to serve gifted students?	10/21/2015 3:11 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

417	<p>I am VERY concerned about the welfare of our gifted children if the proposed operating standars pass through "as is." Our students will inevitably lose service, and our gifted services accross the state will be reduced and minimized even though a lot of districts aren't providing services even now. The proposed new standards for gifted education in a draft dated 9.11.15 represents new thinking that Administrative Code is no longer particularly necessary, that districts are best able to determine the law themselves, and that the State Board and ODE should step back from their responsibility to promulgate rule in favor of deregulation and local control. Unfortunately, for gifted students, who have never enjoyed protections under federal law, deregulation has not been particularly helpful. Gifted children are the least regulated student population in Ohio! There is no mandate to provide services to gifted children and little incentive to identify them even though identification has been required for years and is supposed to be audited by ODE. When state funding was removed from specific personnel requirements in 2009, the results for gifted students were catastrophic: • Identification of gifted students decreased by 8.5%. • Services plummeted to 23% of the gifted count. (For reference, in 2000, the service rate was 41%.) • Licensed gifted staff levels decreased by almost 25%. • Over half of all districts in 2014 reported that they are using some or all of their gifted formula funding for purposes other than identifying and serving gifted students. Some of these funds have been used for such things as computers for superintendents, OAA test prep materials, filing cabinets and other unrelated items. • Only one-quarter of Ohio's districts are meeting the new gifted performance indicator, the elements of which are currently set at a very low threshold. • Ohio has one of the worst "excellence gaps" in the U.S. between the achievement of economically disadvantaged gifted students and those who are not economically disadvantaged. • The value-added scores of gifted students in districts with high levels of poverty are lower than in wealthier districts. This is unlike the value-added scores of the general student population which are evenly distributed. The 9.11.15 draft of the gifted operating standards does LITTLE to help gifted students, and much to ensure that districts will do EVEN LESS than they already do with far greater impunity. The new standards will effectively allow districts to decide that any teacher can be a gifted teacher and that any intervention no matter how irrelevant can be sufficient. Without discussion of the merits of an inputs vs. outputs based accountability system, neither will make a difference for gifted students without quality parameters defining what services are and what level of training is appropriate for teachers to provide those services in various settings. Some regulations exist for a reason. The removal of all staffing,service and accountability provisions in the 9.11.15 draft will make the current poor state of gifted education in Ohio even worse. Districts will soon be legally able to say they are serving gifted children when in fact those students will receive nothing more than a piece of paper with a "served" stamp on it. With regard to outputs vs. inputs, due to ever changing state assessments, infamous low cut scores, and hold harmless provisions, we are years away from actually knowing how effective the output measures are in the gifted performance index and value-added scores. To combat the limitations of these outputs, one element of the gifted performance indicator was developed based on input measures. This was designed to encourage districts to identify and serve gifted children with integrity. But this measure is only as good as the quality of the defined service. If the definition of service is watered down to mean virtually anything a district says, this element loses all effectiveness as a barometer of district effort. No one would ever dare to suggest that it would be appropriate for districts to define the outputs on any other measure in Ohio's accountability system. So why does it make sense for districts to define the outputs for gifted children? The measure will have little meaning, which subverts legislative intent and good education policy. While this is certainly bad for children, it also makes it impossible to determine what service options are the least or most effective, which undermines any system designed to improve quality. Therefore, I PLEAD with you to review the suggestions I've included in this survey. I believe including the suggested items in the operating standards will ensure that there are at least SOME actual standards for gifted education that mean anything at all! Otherwise, these standards are just a vague suggestion to districts about what gifted services are, and most likely, districts will take this as an opportunity to do as little as possible for gifted children ... not because they do not care, but because funding often rules decision making. Your time and consideration are appreciated. The children and I thank you for doing your BEST to ensure quality gifted standards for our gifted children. Thank you! :) Very Concerned Teacher</p>	10/21/2015 3:08 PM
418	<p>Standards for both educator training/licensure and service minutes need to be kept in place. If no,t district leaders may simply lower their standards based on their own needs and agendas- not what is educationally best practices for gifted students. These minimal requirements would not be considered appropriate for the lower end of the spectrum of intelligence, I cannot understand why lessening the standards for our best and brightest would be deemed appropriate.</p>	10/21/2015 2:24 PM
419	<p>Please do what is best for our gifted students in OHIO. NOT WHAT is easy, convenient or politically correct.</p>	10/21/2015 2:18 PM
420	<p>The proposed rule eliminates ODE gifted audits and ORC language that allows ODE to remove funding for non-complaint districts. In addition, there are no provisions to allow ODE reconstitute gifted services in districts that are chronically failing gifted students as required in ORC. Finally, the proposed rule sharply limits the output gifted measures with which to hold districts accountable. ODE is out of compliance with the agencies statutory duty to perform gifted audits. This should be an issue for the auditor of the state to review. The proposed rule eliminates most of the tools that ODE has used in the past or could use for districts that are out of compliance with gifted laws and rules. The proposed rule disempowers both the State Board and ODE to a point where neither body will be able to meet their responsibilities to provide leadership on gifted education issues and stewardship of state fiscal resources.</p>	10/21/2015 1:56 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

421	This rule is not in-depth enough to cover everything that is encompassed in gifted education. I'm not sure why it is thought that the regulations for gifted education can be completely laid out in two and a half pages when they have previously taken fourteen pages. Gifted education involves so much more that what is spelled out in this rule. This rule will lead to highly inconsistent services for gifted students across the state with services becoming less in many districts.	10/21/2015 1:49 PM
422	The standards need to be much more detailed and outline the services that should be provided. I don't understand how prior standards are 14 pages long, and you are proposing standards that are so brief. The gifted students in this state will suffer because gifted services won't be held to any minimum standards. The more wealthy districts will provide more service, whereas the poorer districts will just try to get by without doing much of anything to help the gifted students. Do not belittle the role that trained GIS provide. To allow districts to set their own training for gifted is to provide sub-standard qualifications, resulting in gifted services that do not mean much to the students. The standards need much more input from GIS, as it is apparent that they were not involved in rewriting these rules.	10/21/2015 1:22 PM
423	The proposed rule, if passed, will do a disservice to our gifted and talented students. Our brightest students are the ones that will lead our nation in the future. Instead of hindering the education and the way their education is delivered, the State of Ohio should be supporting our best and brightest students in all ways possible. Please reconsider the proposed rule and do what is RIGHT for our gifted and talented students.	10/21/2015 1:22 PM
424	For school administrators who want to maximize their report card scores and improve their public image, this rule is great. For gifted students, this rule is the worst thing I've seen in education in a long time. Ohio had been making strides forward in Gifted Education and this is a HUGE step backward. Has anyone looked at data from around the nation? What states have the best performance and GROWTH scores for gifted kids? What do their "rules" look like??? Ohio should be a leader in gifted education and education in general. This rule makes Ohio look ridiculous. What happened to the draft that was well researched and based on solid data and ethical practices back in the Spring of 2013? Why was the expert committee disbanded? This survey itself seems bias. It doesn't ask the right questions.	10/21/2015 1:16 PM
425	In general, it seems that much of the language in the 2008 Rule that provided clarification has been removed from this draft of the Rule. While local control is important, the draft provides minimum guidance and direction for identifying and serving gifted students. This is a complex area and the simplicity of the revised Rule does not adequately address some of the complexities that districts will encounter. It is especially disconcerting that there is no assurance that district personnel with expertise and experience in gifted education are required to provide services or to oversee gifted identification and services.	10/21/2015 1:14 PM
426	It appears that in many instances, feedback was requested on whether or not the rule was clearly written in the expectations of what a school district must do, without consideration given to what the actual impact of the rule would be to the schools and students.	10/21/2015 1:11 PM
427	As a parent of three children all identified as gifted since a very early age and educated almost entirely in the Ohio public schools, as well as being an educator myself at the graduate school level, and a lawyer who worked in the child caring segment of human services, I'm appalled at what these proposed rules reflect when it comes to how we, in Ohio, value education generally, but here specifically for those who we KNOW need more than the bare minimum. Our obligation in this state, as taxpayers and as adults and as human beings, is to help these children reach their potential - and hopefully stay in Ohio. What good are any of the government efforts to make Ohio a place attractive to businesses if we don't also show our interest and commitment to nurturing the talent these businesses want and need and deserve? This is no rhetoric. It is the truth. Thank you for putting out this survey but for goodness and God's sake, please pay attention to what is the right thing to do for our kids and our state and our future. A mind is a terrible thing to waste - always has been, always will be. Do NOT pass rules or laws that contribute to that wasting.	10/21/2015 1:09 PM
428	Item 4 on identification mentions districts must "recognize" any test on the approved vendor list. It is not clear if they must accept outside evaluations using those tests or just consider using them as is the case in special education law.	10/21/2015 12:41 PM
429	It would be very important for parents to receive information about their student's status within the gifted identification process. Teachers have been reluctant to refer children for testing for gifted identification and this needs to change. Parents should not have to be the ones to do this.	10/21/2015 12:26 PM
430	We need to make sure districts are held accountable in getting these gifted children the proper education they deserve. These kids also have "special needs". Districts need to make sure these children are excelling. Not just using these kids scores.	10/21/2015 12:12 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

431	<p>There are some good things in this proposed rule, e.g., the requirement to implement whole-grade testing in elementary school. (I have been waiting for several years for that to become a true mandate since it is a basic necessity for identifying gifted students, yet many districts do not do it.) I also appreciate the new two-page version as opposed to the original fifteen pages of the Rule. However, several of the proposed changes have raised red flags within the gifted community. Some objections may be based solely on self-preservation, others because the changes have the potential to diminish the quality of gifted services, and some proposed changes involve both. After more than twenty years working in gifted education in Ohio, it is my view that gifted identification, funding, accountability, and reporting rules have become so complex and unwieldy, it is difficult for districts to meet (and fully understand) these requirements. If we could simplify and reduce that side of the scale, the service side may receive much-needed attention.</p>	10/21/2015 11:50 AM
432	<p>. 1. Reinstate minimum service minutes for students from current operating standards along with caseload limits (without the sunset provisions) from the draft of the gifted operating standards approved by the State Board of Education Achievement Committee (11.11.13 draft). 2. Reinstate and improve service and instructional settings as provided in the current standards and adjusted to some extent in the 11.11.13 draft. 3. Remove the provision that untrained general education teachers provide service unless it is an accelerated classroom as outlined in the 11.11.13 draft. 4. Reinstate gifted coordinator and intervention specialist qualifications from current standards for both districts and ESCs and ensure that all gifted instructors are provided high quality professional development. 5. Incorporate funding parameters to ensure gifted earmarked funding as stated in Ohio Revised Code (ORC). 6. Reinstate instruction time requirement for teachers from current standards. 7. Reinstate provisions that require ODE audits and allow ODE to remove funds of non-compliance from current standards, as stipulated in ORC. 8. Incorporate data collection on specific inputs to determine effect of services. In addition, the results of the gifted performance indicator should be incorporated into an annual report outlining the condition of gifted education in the state without limiting the gifted performance indicator to the current elements. 9. Increase the scope and depth of the written education plan and a reasonable attempt to require parent signature. Also, require that a gifted coordinator or gifted intervention specialist collaborate on the writing of WEPs. 10. Revise whole grade testing from K-3 to K-2 and limit the testing in this initial grade band to superior cognitive ability and specific academic areas of math and reading. In addition, incorporate the deleted elements from the identification section that is required in ORC and which exists in the current operating standards. 11. With the reinstatement of service parameters as described above, incorporate waivers on the basis of performance on multiple measures including but not limited to the gifted performance indicator. In addition, include language from ORC that allows ODE to remediate and reconstitute gifted services in districts that are chronically failing gifted students. 12. Reinstate the district service plan as required by ORC. 13. Reinstate identification and service definitions as outlined in current operating standards 3301-51-15 and adjusted to some extent in the 11.11.13 draft.</p>	10/21/2015 11:37 AM
433	<p>Please, please, please Do not allow our district to implement the perimeters for # of contact hours and the qualifications of the teachers who can provide gifted services. It will be extremely detrimental to our gifted students.</p>	10/21/2015 11:31 AM
434	<p>I think asking schools to provide the number of students who are tested for gifted services is a step in the right direction. These students are often under-served and unidentified.</p>	10/21/2015 11:30 AM
435	<p>Please keep in mind that we are trying to do what is best for these students. They deserve service that is right for their needs, not just ways to provide more points on a district's report card.</p>	10/21/2015 11:20 AM
436	<p>N/A</p>	10/21/2015 10:50 AM
437	<p>none at this time</p>	10/21/2015 10:44 AM
438	<p>With the advent of the gifted indicator, gifted has finally been brought to the forefront. That is a good thing. However, many districts see it as a numbers game and want to "count" everything as a gifted service to its students. I have major concerns regarding the staff licensure and/or appropriate professional development and assistance. Few districts are maintaining gifted licensed staff as older teachers are retiring. ESC coordinators oversee multiple districts and are unable to provide all of the necessary PD and support to ensure that the teachers are receiving adequate training and support. IF there was one gifted coordinator per district and licensed GIS to support regular classroom teachers with curriculum, it could work. We are really watering down what gifted kids deserve and missing the original intent of the indicator.</p>	10/21/2015 9:59 AM
439	<p>There must be more supervision and certification for those who instruct the gifted. It can NOT be in name only. The classroom work Must be "gifted" and the students must learn how to work on their own to explore and expand their own knowledge base.</p>	10/21/2015 9:58 AM
440	<p>We need to have gifted programs, starting in the lower grades. My child's school does not offer gifted classes until 4th grade. I believe that we should start our children as soon as possible. We are missing out on those very important years.</p>	10/21/2015 9:54 AM
441	<p>Once again there are many unfunded mandates. In a small district this is a costly venture that doesn't provide any additional services for our students.</p>	10/21/2015 8:55 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

442	Yet another unfunded mandate imposed on district's with limited funds, reduced administrative personnel, and reduced classroom time due to other state-imposed mandates. What happened to de-regulation and returning local control?	10/21/2015 8:39 AM
443	I believe the state has gone backwards by not designating specific monies that must be used for gifted services and to hire gifted-endorsed educators. If the accountability measures were more valid/reliable, maybe this would not be an issue, but so far, it has not played out that way.	10/21/2015 8:03 AM
444	Clarify personnel that can supervise gifted intervention specialist. It refers to a building principal.. Can a building principal that does not have a gifted endorsement supervise a gifted intervention specialist within a school district? After reading the proposed rules, I still cannot answer this....	10/20/2015 10:50 PM
445	What was the goal of a much shorter Operating Standards? It is SO reduced. Perhaps districts with very well-supported and established programs will not notice, but it becomes a problem for those districts still needing the guidelines and accountability to help support their Gifted educators and leaders.	10/20/2015 9:32 PM
446	The new rule is insulting to gifted students.	10/20/2015 9:27 PM
447	Need to have a limit on the number of students a GIS can have on their caseload. Currently over the 125 caseload and struggling to provide the best for my students. Without a caseload limit, my district will continue to have the GIS teachers have way too many students.	10/20/2015 9:01 PM
448	Gifted children are entitled to a free and appropriate education, like all children. This education should be commensurate with their abilities, and enable them to meet their extraordinary potential. This rule should be guiding districts towards providing that kind of education and service for gifted children. Instead it seems to be encouraging them to save as much money as possible but cutting out actual gifted service, gifted teachers and gifted programs and replacing them with a much cheaper option: lip service. Districts can spend nothing on gifted services and do nothing for students and claim that all kids are "served" under the new standards. We move mountains to help students at the other end of the bell curve (as we should) so that they can meet their potential. Gifted children deserve no less.	10/20/2015 8:58 PM
449	The proposed rule is not to my liking. Staff should be trained in order to teach gifted students and gifted intervention specialists should be on staff to either help with the training or to directly teach (or team teach) with other teachers. Also, there is no mention of cluster grouping for gifted students. Cluster grouping is a way for districts to plan effectively for their gifted population. I am not happy with the proposed rule and suggest that many items be revised.	10/20/2015 8:34 PM
450	MAP testing is an inefficient, inconsistent tool that should NOT be used for identifying students as gifted.	10/20/2015 8:26 PM
451	My daughter who made the honor roll for all of the grading periods while in the 8th grade was not provided any opportunity for gifted testing, nor was I provided any information. Now that she's in the 9th grade, things have not changed.	10/20/2015 8:22 PM
452	Great plan, but my school can't afford to pay me to do everything that's expected of me from the STATE. Do you plan to increase funding to schools in order to accommodate these expectations? Teachers are forced to write and implement SLOs without pay, teachers are forced to check SLOs and have staff make corrections without pay. This is a requirement of the state, and how does the state compensate the teachers or schools for the extra work? We have enough work, we don't need more.	10/20/2015 7:37 PM
453	I don't like that there is no longer a minimum number of hours of service provided or maximum numbers of gifted students on a caseload. It seems that the kids might be getting less and less help with the new changes.	10/20/2015 7:12 PM
454	I was disappointed to see the removal of the support for the regular ed teachers by GIS. Most of the regular ed teachers in our district would lack the skills to deal with the issues that arise from a group such as gifted students. This would be akin to having regular ed teachers teach special ed.	10/20/2015 6:55 PM
455	Gifted students deserve to be taught by educators with the specific training to meet their needs. This watered down wording will allow districts to offer an hour or two of professional development in gifted education and declare that any teacher is qualified to teach gifted students.	10/20/2015 5:26 PM
456	Watering down the current operating standards will be very damaging to the gifted children in the state of Ohio. We need to identify and serve these students with unique needs. If anything, Ohio should be implementing better defined guidelines which require licensed professionals to teach gifted students. The majority of educators have no training on gifted education. My children have had many teachers who do not have an understanding of who they are. Gifted children have been left behind in Ohio.	10/20/2015 4:57 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

457	This proposed rule does not protect the needs of gifted students. I understand that districts need flexibility. So, I applaud the removal of required minutes for service, but I still feel that gifted services in a district need to be overseen by a professional with a gifted endorsement in order to ensure that the gifted students will still have their needs met in addition to the district getting the flexibility that they require to meet the gifted indicator. Please don't make gifted service meaningless for students who have legitimate needs. Ensure that the service is provided by someone who understands those needs, and that the service has a specific service setting. Please don't let the needs of gifted children be determined by someone who has never taken a course on gifted education and does not understand anything about what gifted children require to help them be successful.	10/20/2015 4:35 PM
458	I believe these operating standards are MUCH better then the ones we had in the past. It does allow districts with the flexibility to provide services that are appropriate for their needs.	10/20/2015 4:25 PM
459	Yes. There should be a minimum ratio required by districts of qualified staff to serve students identified as gifted and it should be a reasonable number. Gifted students do not thrive in a regular classroom and may even fail. These students have high potential to develop new ideas, tools, resources for the future of our society; we must meet their potential with the opportunity to grow at their own pace. Why not require a gifted certified teacher in a gifted cluster classroom to count as being served? This make sense - we have doctors train soon-to-be doctors, so we should have gifted teachers training gifted students!	10/20/2015 4:20 PM
460	Overall I agree with the proposal other than the following two points: 1.) I would like to see formative and summative assessments taken out of the WEP. 2.) I would like to see value-added taken off of the report card.	10/20/2015 4:10 PM
461	Many of my teachers identified me as a gifted student. Perhaps that I had worked out the mechanisms of Riemann integrals on my own in 7th grade because I found a problem I couldn't solve had something to do with that. Others accused me of copying out of the encyclopedia. Later, when I was in my 30s, I met a 12-year-old named Gina, and I knew right away that she made me look like a vegetable. I knew then that the best I could do was to help her if she asked for it, that I was not competent to either evaluate nor develop her capacity. The proposed rule may be quite good if the objective is to comply with law. If the objective is to cultivate gifted students, it needs a lot of work.	10/20/2015 4:07 PM
462	Write the rules with more explanation. I am a parent of gifted children, a teacher and a parent of gifted grandchildren -- but there is educational jargon used throughout that I had to guess at. I also don't know if these rules are aimed at strengthening the gifted system or weakening them. I think we should spend more on gifted education and qualified teachers rather than less. Weakening of these rules falls in the "strongly disagree" category for me. We provide incredible support for special needs children on the low end -- which I strongly support. I think we don't do enough for gifted children who are the ones who will be our future leaders and innovators.	10/20/2015 3:57 PM
463	Gifted children are the one group that has already been "left behind" from the No Child Left Behind Act of 2001. The dilution of the Operating Standards for Gifted Education as presented in the proposed draft sends those same children the message that the state of Ohio is leaving them behind as well. While recognized as a special population of students, gifted students have no guarantee from our state to services that meet their unique needs. For years, we have said, despite an abundance of research to the contrary, that in our state, merely identifying gifted students is enough. If a student is fortunate enough to reside in a district that does offer specialized gifted services, he or she can be assured that those services are offered with fidelity. Under the proposed rule, that assurance is eliminated and the needs of this special population disregarded. Additionally, while the proposed rule's intent is to provide districts with "flexibility" in offering services to gifted students, it serves to punish those districts who offer services that are aligned with best practices, and encourages minimal training for staff and shortened services in order to earn points on the gifted performance indicator. Those districts that choose to employ properly trained gifted staff to deliver research-based best practices for its students, will suffer on the report card in comparison to other districts that will report delivering gifted services without providing a significant change in curriculum over a sustained time. While other special populations of students in our state are afforded both assurances in services and protection under the law (students with disabilities, English Language Learners, etc.), gifted students rely on Ohio's policymakers to define services at a level that is both substantive and well-defined. Removing these important components from the rule effectively dismisses the needs of these children and denies them the education they deserve.	10/20/2015 2:44 PM
464	It's time we give equal consideration to gifted students. This rule does NOT do it.	10/20/2015 2:43 PM
465	Districts are given money for gifted staffing and testings in a formula that allocates a certain amount of funding for testing, gifted intervention specialists, and gifted coordinators. Districts must also report how funds are spent. Yet, some districts spend all of their money on testing and don't provide gifted services at all. Is there some way to hold districts accountable for how the GIS and gifted coordinator funds are spent?	10/20/2015 2:29 PM
466	I feel that this is taking a step backward. It went from not doing much to support and extend the gifted students, to doing a lot to try to support and extend, and now back to not doing much to support and extend. I think there needs to be a happy medium somehow.	10/20/2015 2:26 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

467	The state is making a huge mistake by not mandating and funding gifted services for students who are identified as gifted and talented. I am aware of districts who try to LOOK good but do NOT service the gifted students. The research is clear that gifted students do best with clustered with their age appropriate peers who are identified as gifted and talented, yet many districts just put them in classrooms where they fall further behind because they are not being challenged. As a former principal, I have seen this issue manipulated by Central Office to meet the needs of the state reporting. I have so much more to say, but what is the use?	10/20/2015 2:11 PM
468	Provide examples of WEPs in all gifted areas. Spell out what subject areas are to be considered for identification. Update the ODE Handbook for Visual Art Gifted Identification. Thanks for finally updating gifted information!	10/20/2015 2:10 PM
469	These standards send the message that anyone can teach gifted students and anyone can coordinate gifted programs. I fear the passage of this document will end service to gifted children with a GIS. Additionally, gifted coordinator positions will go away - at one point, the state had full time gifted coordinators in districts, now a district is lucky to have an employee that devotes 10% of their schedule to gifted coordination. Is that really the right thing for kids?	10/20/2015 2:05 PM
470	No.	10/20/2015 1:44 PM
471	No.	10/20/2015 1:42 PM
472	Twice exceptional info	10/20/2015 1:29 PM
473	Once gifted, always gifted is lame--get rid of it. We have students ID'd as gifted in elementary school based on being advanced at that time, but by the time they have reached upper grades they have regressed to the norm. It's not fair that we still must keep these students ID'd as gifted for the duration of their academic career.	10/20/2015 1:27 PM
474	Serving the gifted student population needs to be put on par with serving students who have special needs. This population produces our future leaders, so to completely gut the existing rule and open it up to the point that districts can essentially decide that anyone is competent enough to run gifted services seems a bit foolhardy to me. I know the rigor necessary to become a licensed educator, as well as the additional rigor that intervention specialists undergo to train to teach that population. Why should serving the gifted population be any different?	10/20/2015 1:27 PM
475	It would be better if the state would provide separate gifted funding to districts since these students are often overlooked because their standardized scores are taken for granted.	10/20/2015 1:26 PM
476	I feel like our district spends a lot more time and money on our special education students and services and ignores our gifted students. We continue to remove electives for our advanced students and, instead, give that time period to servicing our special needs. I feel that there needs to be just as much time, money, and emphasis placed on gifted education as our district places on intervention education. Is there a way to make that equal or at least required? Our district identifies them, but that is as far as it goes.	10/20/2015 1:16 PM
477	I am disappointed by the lack of understanding of gifted and twice exceptional students in the state of Ohio. The educators need to be brought up to speed. Excellent grades, high test scores, and efficient work production are not the only indicators of giftedness, but they are the ones receiving a disproportionate amount of attention by educators. There are many, many more signs of giftedness in which to look for in students and the unique needs of gifted students must be recognized and met. Gifted students who do not work at their level become depressed and disengaged. We want our leaders of the future to be excited about learning and to do work that is appropriate for their unique needs.	10/20/2015 12:50 PM
478	Gifted education should be equivalent to special education. If we have all of the requirements but none of the funding, how is that fair to the gifted children?	10/20/2015 12:45 PM
479	Let local control handle how gifted services are offered and not what is measured on the report card. For those that believe in local control as they use it for campaign banter, sure don't apply it to their legislative track records.	10/20/2015 12:36 PM
480	The removal of required minutes of service and caseload restrictions will only hurt gifted children. Currently our district has high value added and report card ratings because our students are serviced with integrity. Removing these requirements at a time when districts are burdened financially will reduce the services provided to students. This is a time when we should be looking for ways to gain service, not reduce it. These proposed standards need further revision and should be created with the best interest of the students at heart. Additional time, monies, and qualified staff should be paramount to any standards for these learners.	10/20/2015 12:24 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

492	The proposed rule change makes me feel useless and unwanted - unvalued. These kids have as many special needs as kids on the other end of the spectrum but somehow it's okay to neglect them. People don't understand by neglecting to provide for our best and brightest we are changing our future as a country. You think we're behind China and Norway now, just wait. We'll have more and more kids being bored to death and drop out. We're all just spinning our wheels.	10/20/2015 11:08 AM
493	I like them.	10/20/2015 11:07 AM
494	More required in district services by district gifted personnel. Research shows that the one shot professional development model isn't effective, so allowing educational service centers to continue to provide only four professional development days and count the gifted student as served, is only exacerbating the problems of fewer students receiving less services, and the challenge of ensuring high quality services are delivered to a larger percentage of students. Professional development must be deeply embedded, weekly, bi weekly, or monthly.	10/20/2015 11:04 AM
495	While we appreciate the document enforces local control, we object to the whole grade screenings at two grade bands. In Ohio, we just went through legislatively reducing the amount of time students need to be testing - this provision goes against the spirit of that law. Additionally, with RTI, we find the students that need to be tested and we can use our resources to test those students. I would rather take the \$4000 it costs to screen one grade level of 125 students and instead screen 125 students across my building. This also goes to employing talent strategies with teachers to help us build gifted kids.	10/20/2015 11:01 AM
496	Give us the flexibility that we deserve...especially districts that have a clear record of providing an excellent education. Your current rules (and some new ones) force people to go through a system of procedural nonsense that doesn't allow us to do what we know is best for our students.	10/20/2015 11:01 AM
497	Assessment requirements are great, but as a parent of two gifted children, I would like a lot more focus placed on how they will be educated. What services will they receive? How will the schools help them reach their full potential and how can the schools be rewarded for doing so?	10/20/2015 10:53 AM
498	I am relieved to see that they have kept the requirements for certification for gifted staff. It is important to maintain the integrity of programming to have individuals trained specifically to work with gifted student. This is as essential as the training required for working with individuals on the other end of the spectrum. Thank you.	10/20/2015 10:49 AM
499	This rule scares me on what could be considered service in a district and that a time of service could make things to much a lie. Without time requirements a district can serve kids 10 minutes a week and count it as service. This means it would be easy to show on reports that more kids are served. 10 minutes a week is not a service it is a joke. This rule allows districts to make a joke of gifted education.	10/20/2015 10:44 AM
500	More clarity on expectations and what the DOE will do to help provide support where needed. How will the DOE ensure it has the ability it needs to provided the needed support.	10/20/2015 10:37 AM
501	Not that you'd want to hear.	10/20/2015 10:37 AM
502	Explicitly permit the use of the Cluster Model for service delivery.	10/20/2015 10:37 AM
503	I am disappointed that this window just opened, after being informed that it would open much earlier. A reduction in the number of pages and condensation of standards does not equate into a quality document that will drive the education of gifted learners in the future. Nothing was noted about identification of underrepresented populations. With our changing populations in Ohio, I do not understand how we can omit this with good conscience. I do believe flexibility is necessary for our very differently populated districts in Ohio to provide services for our diverse population. I do not believe this document gives enough details how flexible without watering down our efforts made over the past many years. We are expected to provide for the top 3-5% as we do for the other end of the spectrum, with a skeletal staff of teachers and coordinators and little to no money. I would hope that our leaders would provide the resources, attention, and respect as experienced by Special Education.	10/20/2015 10:30 AM
504	Classroom teachers cannot continue to take on more paperwork without being given adequate time and compensation to do so. Teachers are not given time to plan rich lessons, do report cards, grade, etc. They are spending hours and hours at home to meet requirements. Teacher shortages will become greater and greater with these demands and lack of resources. Many teachers are being required to teach these students without being properly trained or certified.	10/20/2015 10:25 AM
505	No	10/20/2015 10:24 AM
506	Please make clear what it takes to meet indicator on state report card. Please make clear that services must be provided.	10/20/2015 10:17 AM
507	The Operating Standards for Gifted Programs seem to be completely dismantled and this will surely lead to districts not placing great importance on the services and resources they are offering their gifted students. Gifted Education Programs often takes a backseat to all other educational programming, and with the current draft of the new Operating Standards, the message is being sent that our State Board does not believe in providing what is best for our gifted students. Hopefully, the feedback that you will be receiving from this survey will lead to a complete revision of the draft, and what is best for each and every identified gifted student becomes your first priority.	10/20/2015 10:15 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

508	Yes, the proposed rules give districts more flexibility. However, it also removes everything that demands there be quality. With the proposed rules, my district will abuse me. I will be stretched as thin as possible and my students will not get the best of me. The students will suffer. I can't believe anyone thinks these proposed rules are valid and promote a healthy gifted program. I invite anyone that supports these rules to please visit my classroom. Please witness the struggles that are present with the current operating standards. Then, please explain to me, with fidelity how the proposed even makes sense.	10/20/2015 9:49 AM
509	I am concerned about the brevity of what these standards will do to gifted education in Ohio. Unfortunately, with the financial climate dealt to public schools in this state, there is little focus on students that are meeting the maximum standard of minimal achievement on state testing. Our gifted kids are left behind once again! It must be spelled out in detail as to what constitutes service settings and the ongoing HQPD that is necessary for districts to provide. I see a great deal of coding going on without integrity of all aspects of the service and it will only get worse as there are more points afforded to this in the indicator.	10/20/2015 9:48 AM
510	Gifted Education has made HUGE gains using the current operating standards. The specifics in the current operating standards have forced districts to step up and pay attention to the gifted students across the state. I have watched quality gifted programs be put into place and have watched gifted students needs start to be met. Please let's work together to not take giant steps backwards. The proposed Operating Standards are too vague and general. It allows districts to make decisions for gifted students without the proper education and knowledge to know what is truly best for this population. Gifted students deserve to have highly qualified, licensed teachers guiding them. These students have unique needs and the proposed Operating Standards are putting the control and guidance of these students in the hands of individuals who have not been trained to meet their needs.	10/20/2015 9:46 AM
511	Differentiation in a regular classroom setting is not a substitute for Gifted Services. A clearly defined program with like peers is what these students need. Students in my district are pulled from their gifted class to make up homework. When will gifted services be viewed as important by the state of Ohio and adequate funding given to offer the services these students need.	10/20/2015 9:37 AM
512	Would like to propose that any data used for funding and/or accountability be available in report format for districts to verify data accuracy prior publishing of said data. The department can create data error checks to ensure rules are being followed within districts and across districts. There is no check for if a student is marked Yes ID'd and Yes served that they have courses and/or program codes to verify those services are actually occurring. There is no check for if a student is ID'd that when the move to another district the next student is still reporting as ID'd or not. There has not been a reported for gifted data for total screened, assessed, served and ID'd in a usable format for data verification in the EMISR data collector. A subset of data is placed in the SDC (secure data center) with only SSID's but it's usually very late in June/July, only accessible by certain staff in the district, and is not in a usable format. Would be helpful if the department could share data reports formatted in usable fashion with districts in advance as the data is reported?	10/20/2015 9:33 AM
513	It would have been helpful to be able to review the proposed rules when trying to answer the questions, I would have returned to the rule information to screen again it's content before making my selection.	10/20/2015 9:33 AM
514	Assistance from the State has not been good and very negative for those of us who have to update. Will there be guidance given to these State individuals as to how to assist our districts in a cordial way along with valid samples shared. Also, is there a plan to increase funding for gifted. Without increased funding it is difficult to pull resources from all the mandated areas to increase services etc. There should be NO tie to the grade card for the district unless all districts have equal resources and this will not happen any time soon.	10/20/2015 9:33 AM
515	In a society that seems to put a lot of emphasis on having the proper credentials for the job and passing the proper tests at the appropriate score, the proposed standards eliminate the necessity of a teacher having the proper credentials and support in teaching our brightest students. It appears that the bottom line is a high score on the gifted report card and the gifted inputs. The new standards focus on the bottom line while assuming that the proper structure will be put in place at the district level to achieve the high ranking. I think there will be a lot of broad interpretation by the districts to report students as served in order to try to achieve a high number of points.	10/20/2015 9:31 AM
516	Each gifted student should have the services that they will receive written, agreed on and signed the same as an IEP. Kids in elementary and middle school should have advanced classes clustered to meet their needs and thus should be required for each district to provide	10/20/2015 9:31 AM
517	Please do not take away the protections that gifted students need in the state of Ohio. Without far stronger guidelines from the state, the quality of education for gifted students will not be consistent from district to district. Students who qualify for special education services have so many protections, but we are leaving our top 5% of students to the mercy of districts who may or may not be motivated to provide research based, quality service. We are not protecting our most talented students and wasting a valuable resource for Ohio's future.	10/20/2015 9:27 AM
518	A minimum level of services must be clearly outlined.	10/20/2015 9:27 AM
519	Adopting a plan for providing education to our brightest students is an important first step. Providing coursework and opportunities for them to learn and grow is the most important step.	10/20/2015 9:24 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

520	My experience is that ODE will do what they want with little if any input from the Districts.	10/20/2015 9:15 AM
521	My main complaint I hear from staff members in my district is the "once identified, always identified" rule. This is mainly a complaint in the middle and high school grades with students that were identified in early elementary school. While obviously there is a certain amount of accountability for our district and our teachers to enrich/support our early gifted learners so that they continue to excel in the later grades, the students that score gifted one time, on one test are a concern to me as far as their gifted identification. This leads to an over-identification of gifted students. I also understand it is up to us to choose how we enrich our gifted students and who we provide services to, but the parents become very involved and have high expectations for gifted services that we don't have the funding for. Is there something that can be done about this identification process so that we are truly testing for giftedness, not what could just be a "good day" taking a test?	10/20/2015 9:14 AM
522	The area of gifted services is significantly underfunded in Ohio. The emphasis on the rules around identification, compliance, accountability are all misplaced priorities if you're not going to be serious about actually servicing the diverse learning needs of these students with funding to provide high quality opportunities.	10/20/2015 9:02 AM
523	The rules are well written and support the work needed to be done. Districts continue to find difficulty with finding candidates that can fill the role of a GIS.	10/20/2015 9:02 AM
524	Please don't let this be another unfunded mandate on districts. Work to provide funding reimbursement to encourage and push our brightest children.	10/20/2015 9:01 AM
525	raise class limit from 20 to higher so more students can be serviced	10/20/2015 8:58 AM
526	I appreciate that Ohio is moving forward with gifted education (from mandating only identification as opposed to service). However, gifted children are not receiving the same amount of support as the children on the left side of the normal curve. These are the children that have the potential to rule our country and world. Don't they deserve to be challenged/serviced?	10/20/2015 8:57 AM
527	Identified gifted students should receive the same funding as identified special ed. students. Our gifted students are not being challenged especially in the primary classroom where developing skills and work habits for their educational career occurs. Putting gifted students on a computer is not differentiated instruction in the primary classroom. Accelerating grade levels does not meet the gifted students needs. All students need individualized instruction in their grade level to meet their needs.	10/20/2015 8:55 AM
528	Thank you for asking for feedback.	10/20/2015 8:54 AM
529	You have completed gutted gifted education and if these proposed standards go forward, you are signing the death sentence to our highly talented students. It's no wonder why the US is trailing all other countries with developing high intelligent students, it's because you keep cutting any funding and any standards to help these students succeed.	10/20/2015 8:53 AM
530	no	10/20/2015 8:51 AM
531	While it is important for districts to identify gifted students and provide them services, it is hard to believe all these requirements are necessary.	10/20/2015 8:50 AM
532	No ORC should be allowed to "strike through" 15 pages then submit an entirely new two page draft. It will leave coordinators with very little guidance. It will allow districts to continue to ignore the real needs of services for gifted, and it therefore will HURT students.	10/20/2015 8:47 AM
533	Training, time, staffing, and proper funding of the gifted process would be beneficial.	10/20/2015 8:47 AM
534	They are all ridiculous. Gifted education is a total farce. If the state wants truly gifted education it needs to fund it.	10/20/2015 8:44 AM
535	As I mentioned earlier, what additional funding is going to be provided to schools to implement these standards?	10/20/2015 8:41 AM
536	The proposed rules are fine and will help the state check boxes to give the air of accountability to the uninformed public. In reality, these unfunded mandates place undue stress on districts and the requirements for identified students is stupid. Plus, why is it that a student could "grow" and be released from Special Education, but that a "gifted" kid is ALWAYS gifted. That is stupid. Sometimes kids guess well on a test and that doesn't make them gifted, they are just a good student.	10/20/2015 8:39 AM
537	Return local control.	10/20/2015 8:37 AM
538	I would just like to see a clear, unbiased and well communicated system that works for all students. And one that bears in mind an understanding that all students should be given the same opportunities. I would also like to see some sort of Director position that ensures that specialists are not being biased and are working in a progressive manner.	10/20/2015 8:35 AM
539	Pretty amazing that we trashed the previous ones completely and created such a vague and flexible document. Ultimately, students in districts where gifted is important will be well served regardless of the operating standards. Those in districts looking to cut costs and corners will suffer as just about anything could be justified as a gifted service.	10/20/2015 8:32 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

540	I like that the proposed rules are much shorter, simpler, and allow for more flexibility in providing services.	10/20/2015 8:29 AM
541	How will districts be monitored? How can a parent get educated about what tests are truly valid assessments? If a student is labeled gifted, is it forever? How can early identification be addressed?	10/20/2015 8:27 AM
542	Help kids early in education, or fund them at a respectable level.....tell the state to try spending as much on a kid as you do on a prisoner, maybe the prisons wouldn't be so crowded.	10/20/2015 8:26 AM
543	Rules without resources for implementation will result in no better services for students.	10/20/2015 8:25 AM
544	I think the proposed operating standards for gifted education allow flexibility for districts while providing a framework for gifted services in our state. I applaud your efforts to revise the operating standards in this manner. What you are proposing is good for students!	10/20/2015 8:13 AM
545	Overall it seems that they are too vague and give districts too much freedom and flexibility in "serving" gifted kids. While flexibility seems like a good thing, it doesn't ensure any minimum level of quality in those services.	10/20/2015 8:11 AM
546	I see a lot of room for interpretation by the various districts. Many items are not very specific and even though I like the flexibility for districts, I can see where that flexibility will also lead to many discrepancies in interpretation as far as identification and services.	10/20/2015 8:10 AM
547	Awful. I am writing my Reps, Senators, and the Governor to tell them how I feel. We are getting killed globally in education. The parents of gifted students are taking their kids out of public schools and putting them into private schools. We have chosen to keep our children in public schools. If there was not a well-defined, well-structured Gifted program at our school, we would have taken our kids out years ago. Our daughter got a 34 on her ACT. Our son is similarly gifted. Rules like these will prompt parents to take their kids out of public schools in droves. Bad policy.	10/20/2015 8:06 AM
548	Thanks for sending out the survey!	10/20/2015 8:06 AM
549	NA	10/20/2015 8:05 AM
550	There are many parents that feel as though their child is gifted and will request testing. If there are some students found to be gifted in areas where we do not offer services, what is our responsibility and and what are our expectations?	10/20/2015 8:04 AM
551	We will comply with whatever we are required to do. Funding and finding qualified staff to properly administer gifted programming is a challenge!	10/20/2015 8:03 AM
552	Let us take care of things WE are doing well without interference	10/20/2015 8:03 AM
553	As stated earlier the legislature is once again trying to appease a subset of individuals that have lobbying power. If the state feels that gifted education is vital then they need to fund it in a way that it can be useful. Our district of 1200 students gets less than \$30,000 of gifted funding from the state. This is not enough to hire a gifted coordinator or even a district-wide gifted teacher. Again it is appeasement of the group by creating rules that cannot be met due to lack of resources then criticizing the districts when they fail to meet the mandates. There needs to be honest determination of costs for an EFFECTIVE gifted program and then funded at that level. Otherwise this is just another meaningless addition of reporting with no results possible.	10/20/2015 8:01 AM
554	Gifted students are unique and should be treated as such. They should be provided qualified staff who has the training to teach these students, not a regular education teacher.	10/20/2015 7:59 AM
555	None	10/20/2015 7:58 AM
556	I wish that what qualifies as a quality service could be better outlined. For example, the district my children will attend will be able to say that they provide gifted services but their service model is lacking a lot in terms of considering the needs of the whole child and the connection between their "gifted time" and their "regular education time". 2 different teachers that don't talk with each other just looks like a one day a week project camp and not an integrated plan to serve my kids.	10/20/2015 7:58 AM
557	Parents and students should be advised how their teachers meet gifted ed qualification.	10/20/2015 7:56 AM
558	This appears to only be increasing the amount of "paperwork" that is completed at the building level. It appears to be the same requirements that a student under IDEA would receive, with regards to paperwork. Clearly, gifted students need to be identified and pushed forward in their learning, but providing them with Education Plans only increases paperwork, and does little for their education. This proposal will not affect the education of any gifted child, it will only increase the amount of time spent doing paperwork and not educating students.	10/20/2015 7:50 AM
559	When is ODE going to get serious about providing LSD adequate funding to implement the programs they mandate.	10/20/2015 7:49 AM

Feedback Survey on Proposed Operating Standards for Gifted Education

560	The proposed rules are a travesty and will set back education by decades. Presenting these new rules without presenting the old ones that they replace is dishonest. Comparison cannot exist in a vacuum. This proposed document guts all meaningful definition of appropriate services, of trained and professional personnel that have the skills to serve gifted students, and of try fiscal accountability. It cheats our students of their budget allocations as determined by the legislature. The State Board of Education has truly put forward a plan that does a complete disservice to its student constituency. I'm appalled.	10/20/2015 7:42 AM
561	Gifted students are such an important part of the future. State guidelines need to ensure they are supported. These guidelines make gifted programs an easy cut (or scaling way down) when budgets get tight. This should not be the case!	10/20/2015 7:40 AM
562	1. The operating standard must provide an opportunity for all students to be tested gifted. 2. Provision for gifted programs. 3. Accountability of operation not just for identification but services.	10/20/2015 7:36 AM
563	As educators we are told how important it is not to label kids. Now, we are going to do the exact opposite of what we have done for many years. We make sure we have all IEP students identified (MH, OHI, LD, etc...). Now we are going to make sure that we do the same for gifted. What happens to the all the students in the middle? How long will it be until the state department comes up with a NEP (normal educational plan)? How about we just give every child an IQ test and place write the number on their face with a big sharpie? Or, wait I got it. how about we take it a step further and make sure we separate them by eye color, hair color, sex, religion, and race while we are at it. This is just another way to create a job for someone who has nothing better to do. This will be outstanding in the next couple years to see a teacher with a class of 25 (10 IEP's, 5 WIEP's and 10 NEP's).	10/20/2015 7:36 AM
564	While these changes are a step in the right direction, as an educator and as a parent of a gifted student, these changes still do not hold a district liable for providing these services to all students identified as gifted. There continues to be no consequence to the district when a WEP is not enforced or when less than qualified teachers provide the services.	10/20/2015 7:28 AM
565	These students and potential students deserve these services and this accountability.	10/20/2015 7:25 AM
566	No	10/20/2015 7:20 AM
567	This is another waste of valuable time. More wasted time doing paperwork instead of focusing teaching.	10/20/2015 7:16 AM
568	I appreciate the removal of nearly 10 pages of words for words sakes. I believe the intent of identifying gifted children is moving in the right direction; however, I do not see a "how" in place with a grade level test. If the state is looking to be more inclusive with the gifted program, as the text reads, resources are needed to administer individualized testing that goes beyond traditional written tests. Local districts would rely on the state to fund this as each district is not equally funded with state money. Accountability is unclear. It clearly states what the local level must be accountable for to the state; however, there are little to no references on what that information is used for OR how the state is accountable to the local districts. Ultimately, as the state collects data of the various local approaches, are they searching for a best approach to standardize across the state? Gifted vs Common... what is the funding guidance? It references to disclose spending on gifted students; however, as a parent I am not sure if that is for punishment or praise as no measures are stated.	10/20/2015 7:06 AM
569	Limit the number of students that one intervention specialist can be responsible for.	10/20/2015 6:53 AM
570	See comments throughout. As usual, the State of Ohio seems ill-prepared to meet the needs of the gifted.	10/20/2015 6:38 AM
571	Thank you for utilizing this survey tool for gathering input! I appreciate the chance to be a part of the conversation when I normally would not be.	10/20/2015 6:27 AM
572	It is understood that these students are underserved in the majority of our schools. If funds are not offered to meet these higher expectations, the results will not be as positive as we would all like to see them.	10/20/2015 6:14 AM
573	More rules and regulations! Over reach of beurocracy!	10/20/2015 6:07 AM
574	State required testing especially at the high school level is in such a mess right now I can't believe you're going to add to it.	10/20/2015 4:52 AM
575	Remove them entirely and go back to the existing standards and rules. Ensure that all students have a uniform definition for gifted identifiers, gifted services, gifted teachers and gifted evaluation. Ensure that gifted education in the most affluent districts will have the same requirements as gifted education in the least affluent districts. Ensure that districts cannot cut gifted education as an "easy fix" to a levy failure. Don't believe the pervasive idea of "oh, they'll be fine, they're gifted". Ensure that Ohio's gifted education is the best it can be. Ensure there is an "apples to apples" comparison for gifted education across the state. Don't be so naive to assume that you can regulate the outcome of a process with no effective regulation on the inputs to the process. Ensure that there are minimum standards for identification, services offered, teachers, etc.	10/19/2015 11:21 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

576	The proposed rules should address the need for self-contained gifted programs, such as Columbus Gifted Academy. Creating that program in its own building was a much-needed change in the district and its funding should be protected with additional rules created to address identifying the need for expanding the program.	10/19/2015 11:02 PM
577	At what age/grade does the gifted program begin? Ridgewood tested in 2nd grade, but the students didn't begin until they were in third grade. After middle school (4th through 7th grade) there wasn't an established gifted program. Spanish and Algebra 1 was offered to some 8th graders. It was supposed to go by GPA and recommendation, but it didn't. Discrimination was not mentioned in the proposed rules. Please include the list. Is there a number of students per teacher/instructor? Is there an amount of time per day, week, or month that students are supposed to be in the gifted program? Are the gifted student programs allowed to schedule activities that are away from the School district? Are there any restrictions to how far they travel and how much time they miss from their other classes? How do regular classroom teachers report the attendance? How are grades entered/averaged for assignments missed while the students are in the gifted program? What if a child is found to be gifted in the arts and the school district does not offer the specific art?	10/19/2015 10:44 PM
578	Unfortunately school districts can not be trusted to provide quality specialized instruction to gifted students under these guidelines. A minimum amount of time per week or day for specialized instruction for students identified as gifted needs to be set in these state guidelines. School boards want flexibility because of fiscal reasons-not because of what is best for children. In the past decade district after district have cut gifted education services. Without required amounts of time and a requirement for certified gifted specialists, the needs of many gifted children will not be met. I am also very concerned with the gifted children who come from poverty. Without trained teachers for these children our state will be losing many of these children to the problems of poverty instead of gaining their talents as a resource. People (even educators) who have not had a high need gifted child of their own do not understand the depth of need of gifted children. My child was so bored in school before being placed in a gifted education class that she was disengaging from school and was under achieving. The gifted program made all the difference and she now loves learning and is doing much better. The state makes many laws for things and I think strong guidelines for meeting the needs of is at risk population of students is a legitimate function of our government. Do not play politics with my child.	10/19/2015 10:34 PM
579	Gifted kids' behavior should not hinder who is tested or not. A lot of gifted kids present social awkwardness due to their brain development.	10/19/2015 10:29 PM
580	Districts should provide equitable services throughout the district. No school should receive the wealth of support services.	10/19/2015 10:25 PM
581	None.	10/19/2015 10:02 PM
582	Who wrote the most current draft of the Operating Standards/how did the draft end up in this current form? Did current research and best practice in gifted education serve as a guide for the current DRAFT standards revision?	10/19/2015 9:58 PM
583	Why change the rules? They were fine. If you are not mandating gifted services in Ohio, then why are you allowing teachers without certification to teach them? This all sounds like a cheap alternative to quality instructors. Leave the operating standards alone. They were fine.	10/19/2015 9:52 PM
584	As I said earlier, I am glad to see that the state is finally giving gifted education the attention that it deserves. These children will be our movers and shakers someday. We need to identify as many of these children as possible and do everything in our power to give them all of the opportunities they need to develop their talents. We must remember that giftedness does not look the same in all students - academically gifted students do not resemble those who are creatively or artistically gifted, but they are all important. The identification process sets the parameters for programming, so make sure it is clear. Also, more professional development is required to ensure that our students are taught by those who understand their unique characteristics.	10/19/2015 9:47 PM
585	Gifted service is different in every classroom at every grade and in every building in this state. Requirements in all domains should be broadened and strengthened not watered down.	10/19/2015 9:46 PM
586	Excellent. Needed to balance the educational services with the services provided for special needs. How will these rules apply to chartered non-public schools? What about options for school choice and funding for students on gifted individual learning plans similar to the options offered by the Jon Peterson Scholarship program?	10/19/2015 9:34 PM
587	You do not address the number of gifted students in a classroom - as in the current gifted operating standards. Nor do you address the number of minutes a student must meet with the GIS in order to be considered served. These operating standards have basically taken the teeth out of gifted education requirements in the State. Districts can be very lax and very loose in the education they provide gifted students with these standards. I am especially concerned that teachers who will be teaching gifted students will not be required to have a certification in gifted education. Professional development and even work with a GIS is not enough to insure appropriate gifted education for students. And I am concerned about class size for a gifted classroom and the student to teacher ratio for gifted education. You emphasize the reporting of data - which is a lot of work for the district - but you do not give the same weight to the quality of education provided to gifted students. This indicates to me that you are more concerned with data than with ensuring high quality education for our brightest students.	10/19/2015 9:28 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

588	We need flexibility not more rules.	10/19/2015 9:07 PM
589	Again, I personally feel far too many man hours and dollar resources are being spent on this issue. Yes, serving our gifted population is important, however districts have many more urgent student needs that should take priority. Too many rules, regulations and paperwork.	10/19/2015 9:05 PM
590	These rules are vague and provide far too much flexibility in providing services for gifted child education. I am fearful that gifted child education in Ohio will become "lip service," and that districts will learn to play games in meeting department requirements for programming and funding while truly not providing gifted children with the educational experiences they need.	10/19/2015 9:04 PM
591	Invite us to discuss these proposals at an open forum. I don't see this as a move forward in serving our gifted students.	10/19/2015 9:02 PM
592	Provide more funding	10/19/2015 9:01 PM
593	It will be great IF Ohio actually begins to have services for gifted students. BUT, the services need to start at Kindergarten and they need to be every day (once a week pull outs are a waste of time). Gifted children need to be grouped together, so that they are not always the "smartest one in the room". They do not need to become teachers or tutors for the other students. They need to be with children their own ages who think like they do. This can not happen in a regular classroom with non gifted children. Highly gifted children and Profoundly gifted children (IQ over 145) need even more than "regular gifted (IQ 130) children. Also, the program needs to take into account the asynchrony of these children. The 5 year old who can do long division in his/her head, probably can NOT write it all out, and especially on the worksheets normally used by 10 year olds. The child may have the cognitive ability of a 10 year old, but he or she is still only 5 or 6 or 7 years old and that also must be taken into account. Also, the CCP program is UNFAIR to homeschoolers (where most of your very gifted students end up). It is not right, that the public school students were 100% funded this year and the homeschool students got nothing! I pay taxes, but my school system can not or will not educate my child. Now the state won't pay for him to do CCP. Homeschoolers should get funded FIRST, as we get no benefit from our taxes, school wise.	10/19/2015 9:00 PM
594	There is no criteria for a coordinator. Is the proposed rule to give this job to another person who's already overworked and underpaid? How are services going to be equitable, and high quality without a qualified person to oversee these services and standards?	10/19/2015 8:36 PM
595	I foresee misconceptions, lack of funding, inaccurate data being reported. I support accountability, but with all the options for how to serve gifted, it will be a convoluted report given each district will interpret law, and serve and report differently yet = report card indicator for this subgroup (gifted) won't be accurately portrayed across the state.	10/19/2015 8:27 PM
596	The 1983 report, "A Nation At Risk," developed by the Reagan administration warned of the intellectual losses we would face if we continued to neglect our gifted and talented youth. Further, a 2002 Ohio Gifted Task Force commissioned by then State Superintendent, Susan Zelman, made these same recommendations for clear policies and standards related to accountability, service structures, identification, and educator training, with additional recommendations on funding, state leadership in the field, and parental support. Years later, we are still dealing with some of the same issues. Of even greater concern, we now have to revisit some of the topics addressed in the 2008 standards because the current draft is a major step backwards. In order for the board to fully meet its objective of "effectively delivering support for a high quality education" for every child in Ohio, we must finally fulfill the vision of those who have gone before us or, at the very least, not destroy the work already done.	10/19/2015 8:16 PM
597	The gifted indicator should be reevaluated.	10/19/2015 8:12 PM
598	There is too much room for interpretation by each district. Since we are in the age of Common Core Standard FOR ALL, why not have a more standard way of dealing with our gifted youth? This should include tests used, staff training, and reporting.	10/19/2015 8:10 PM
599	Where are the quality indicators? How often must children receive gifted services? How many minutes weekly constitute service? How many children can a facilitator serve? If children are clustered what training is necessary for a cluster teacher to be the service provider? This rule is so watered down it would be laughable if it wasn't meant to give an appropriate education to a child. Please reconsider, truly do what is right for our children, not what is expedient for government or the business round table.	10/19/2015 7:59 PM
600	Again, the definition of gifted needs to be standard and comprehensive so there is little room for misinterpretation.	10/19/2015 7:45 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

601	<p>I believe that the previous gifted rule has been almost COMPLETELY ignored when the proposed rules were created! There are SO MANY quality regulations that existed in the previous rules that have been TOTALLY eliminated in the proposed rules. I feel that the more stringent regulations that have been deleted from the previous rules were very valuable and SHOULD NOT be removed from the new rules. The inclusion of regulations about class size and case load should not be removed. The "minutes of service" requirement should not be removed from the rules, and the criteria for individuals who serve gifted children should be much more specific for teachers who are working with gifted children in public schools. I feel that a lot of revisions are needed, and I feel that those who are proposing the new rules REALLY need to go back to the rules we had before to pull out the specific requirements for districts that were in place and add them to the new rules. I fear that removal of those specific regulations will allow districts to minimize services until they are basically unrecognizable. I believe that districts will not do this simply because they do not care about the education of gifted learners. I feel that this can and will take place because districts are often struggling financially, and gifted services are oftentimes the first program to be cut or "edited" to save money. I don't want to see that happen in Ohio. I know that I may have written in capital letters a few too many times in my comments, but it is the only way that I can truly express how serious these rules are for our gifted children. I am attempting to stand in the gap for them and defend their right to be served just as children who are on IEPs and 504s are served. We don't see regulations regarding special education being reduced and made more "flexible." If anything, those regulations seem to get more and more stringent each year. So, I am sharing these comments as an attempt to help you see that the education of our gifted children is just as important. We need to recognize that if our nation is going to have any hope of advancing and competing with other nations around the world, the gifts and talents of our gifted children NEED to be valued and developed, and the rules for gifted service in Ohio play a HUGE role in ensuring that happens. Thank you for your hard work in developing rules that will truly benefit our gifted learners.</p>	10/19/2015 7:40 PM
602	<p>Do a thorough assessment of the Indian Hill School District and Tracey Quattrone. They are not meeting the criteria in writing Wep's for high school AP classes and more!</p>	10/19/2015 7:33 PM
603	<p>I believe that more rules, accountability, and mandates are unnecessary and costly to the taxpayers. Local control is the direction our parents want most.</p>	10/19/2015 7:33 PM
604	<p>These new standards are erasing what we have tried to accomplish for so many years in order to appropriately serve our gifted students. Please return to the specific standards that we had in the past, or else districts will count almost anything as a gifted service. In is VERY important that those that provide gifted services have gifted CERTIFICATION.</p>	10/19/2015 7:17 PM
605	<p>I have heard that the required minutes of service and student limits are being removed from the rule. I think it would be disastrous to eliminate those two items. Without these requirements I fear that districts will water down gifted services by having their GISs serve multiple grades/buildings within the district. Even with the current rules in place, GISs are stretched very thin and the needs of our gifted students are not being met.</p>	10/19/2015 6:47 PM
606	<p>I believe when identifying and dealing with gifted children that a psychologist must be involved. There are many emotional issues that go along with being gifted. Peer groups change, children feel isolated or fussed over. Please consider the emotional side of giftedness in your proposal.</p>	10/19/2015 6:46 PM
607	<p>I wish there was a cap on the number of students in a gifted group at one time. I have a huge class of gifted students and do not think it is an effective way to meet these gifted students needs when they need individual plans and services.</p>	10/19/2015 6:39 PM
608	<p>The gifted instructor needs to be a part of the students' value added piece for their evaluation process.</p>	10/19/2015 6:37 PM
609	<p>All rules for gifted students should be evaluated and reevaluated to ensure that new limits are not imposed on potential opportunities or rules made that deflect creative, innovative and effective programming.</p>	10/19/2015 6:34 PM
610	<p>Leave everything as it is or give more local control for gifted back to the individual school districts-</p>	10/19/2015 6:32 PM
611	<p>Are these rules for real? This is a slap in the face to gifted. Let's make a real rule and hold schools accountable.</p>	10/19/2015 6:28 PM
612	<p>As a parent and teacher, I have serious concerns about these new operating standards. As with any institution (think big banks and insurance companies), we would love to believe that they will do what is right and will be allowed flexibility to ensure proper service however, deregulation rarely does any good. I am most concerned by the lack of specificity in service. Service can mean many things to many people and unfortunately the majority of administrators don't like gifted children and their parents so they would use this as their opportunity to gut services that these children need. Education is about a year's worth of growth for all but unfortunately many districts have only the lowest populations on their radar. The gutting of the service descriptions also undermines the promise of the gifted indicator. Please consider that which you are doing to our highest students. They deserve better!</p>	10/19/2015 6:25 PM
613	<p>This appears to place the majority of the work on the district. In smaller districts this is problematic.</p>	10/19/2015 6:25 PM
614	<p>It's great to see this consideration for gifted education but as a grandparent of gifted students and as a sister to a gifted educator, I am certain that many districts, i.e. especially one in Northern Summit County that I know of, are lacking in the way they approach gifted students. It is not enough to be paper pushers and really turns such bright kids off..</p>	10/19/2015 6:01 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

615	Documentation of gifted services needs to be provided to the parent in a clear format, not just a note stating this is what we are doing. Having had a child in what is suppose to have been a gifted program, who has shown no growth within the program for the last several years has not increased my faith in the program. Instructors or participants in gifted programs need to be HQT in that subject area not just gifted itself. Having had a student in a program being taught by a gifted teacher who did not have the background in the specific subject area she was trying to teach, did not help provide growth and only instilled misconception that will have to be unlearned or clarified.	10/19/2015 5:47 PM
616	Do not penalize districts that are not able to offer services.	10/19/2015 5:47 PM
617	There needs to be strict policing of books and numbers. Now children are only tested if the parent requests and schools don't respond. They will treat this like they do special ed. and thumb their noses at it.	10/19/2015 5:43 PM
618	Need to clarify if once gifted, always gifted or if students are re-identified and on what timeline	10/19/2015 5:41 PM
619	So many of the current operating standards have been removed! While local control is important, we must remember that services for gifted students, while immensely important, are often viewed as a non-essential by those who don't understand. We need to have more concrete parameters in place to ensure that these students are not overlooked.	10/19/2015 5:38 PM
620	Every mandate creates a better situation for some students and creates difficulties for others. How do you measure success? Set the criteria and allow districts and communities to find the best solution for students.	10/19/2015 5:37 PM
621	As a retired elementary principal, I am pleased the Department of Education is being proactive regarding our gifted students.	10/19/2015 5:35 PM
622	I have been in public education in Ohio almost 40 years now.... putting something in a grade card so it may pressure the local taxpayer to tax themselves, rather than the Legislature and Governor simply biting the bullet and funding items State wide adequately seems to be the popular approach. I would love to see our lawmakers do what they know is right, rather than what is easy to pass off.	10/19/2015 5:33 PM
623	As a parent of two gifted children, I appreciate the attention being given to addressing the fact that gifted are now left behind as we have sought to bring up those who need additional attention academically. I would argue that the gifted student also needs the additional attention to not be invisible when he or she "makes the grade" of acceptable measure, even if there is much more potential there!	10/19/2015 5:32 PM
624	I think you should take another look at the rules and really determine if that is the message you want to send all of your gifted students and their parents. Money should never come before education. Gifted programs are struggling with funding as it is, why can't the state look at this from a productive societal gain in funding these students better to reach greater potential within the PUBLIC education system? Do we really want to short these students more than what already exists?	10/19/2015 5:30 PM
625	The proposed rules seem like several steps backwards for gifted education in Ohio. One only has to compare the number of gifted children with the number of students with disabilities to see the disparity in funding and resources. How can we say that one group's needs are any different than the others. Gifted students from the 16 districts in our ESC have approximately 5,000 gifted students. How many special education intervention specialists would be needed to serve these students based on Ohio law? We have 16 total gifted intervention specialists serving in these districts. That is a 312:1 ratio. I would venture to say that there isn't a special education teacher in the state serving 312 students. Gifted students have unique needs and are typically in classrooms with educators with little or no training in gifted education.	10/19/2015 5:27 PM
626	It was not made clear if the proposed rules are amendments to current rules or brand new rules; and therefore no comparison point to current rules.	10/19/2015 5:27 PM
627	It would be helpful to classroom teachers to have the contact hours that an identified student needs to have with a gifted specialist listed.	10/19/2015 5:22 PM
628	Gifted Education is another unfunded mandate by the Department of Education. Small rural districts are unable to meet the demands of this program without asking its constituents for more money and personnel. You keep dumping more and more work on teachers, staff and Central Office personnel because some special interests groups are lobbying for their special projects as a way of keeping their jobs. Please rethink your position or provide the needed resources and personnel to meet these guidelines without dumping the details and plan on the districts. Why not have a special after-school STATE FUNDED AND ADMINISTERED PROGRAM where you send state personnel to the schools and pay them through state money to run the programs? Schools can hardly meet your demands as it is! Why are politics running our schools?	10/19/2015 5:20 PM
629	To increase the accountability and evaluation of districts gifted students but change the rules regarding proper service of these students is setting districts up for failure! More than that we are setting gifted students up for failure and letting down our future generation of leaders.	10/19/2015 5:19 PM

Feedback Survey on Proposed Operating Standards for Gifted Education

630	ODE needs to get out of the way of districts and let them do their work, especially if the district is achieving well. Stop the bureaucracy and paperwork and let people make decisions and spend time with kids rather than writing WEPS and WAPS and other such craziness. Additionally, it is SO stupid that a kid who has been accelerated only counts the first year of an acceleration. Accelerating a student is one of the best ways, according to the gifted research, to meet a kid's needs. So let districts count these students as being served on-going. The way ODE has decided to "count" service needs a great overhaul.	10/19/2015 5:18 PM
631	Another wasted effort by ODE. Must be another political law pushed by ???Colleen Grady????	10/19/2015 5:16 PM
632	No	10/19/2015 5:07 PM