



INPUT ON OPERATING STANDARDS FOR IDENTIFYING AND SERVING GIFTED STUDENTS

September 18, 2013

The Ohio Association for Gifted Children (OAGC) has reviewed the proposed new standards for identifying and serving gifted students in detail. Below, please find a summary of the major improvements and items needing revision (of which there are many) as well as a detailed discussion of the consequences for many of the changes and our recommendations for revisions. If you have any questions, please contact Ann Sheldon at anngift@aol.com or 614-325-1185.

Major improvements:

- Two whole grade screening opportunities
- Gifted professional development required yearly for gifted specialists and coordinators

Major issues needing revision:

As a document that specifies the education of and for gifted children, items exclusive to the general population and not applicable to gifted children are inappropriate and need to be stricken.

- Reinstate minimum service minutes for students from current operating standards
- Reinstate caseload limits from current standards
- Reinstate instruction time requirement for teachers from current standards
- Remove provision that untrained general education teachers provide service unless it is an accelerated classroom
- Reinstate gifted coordinator qualifications from current standards
- Reinstate unit funding language from current standards, in compliance with HB 59
- Reinstate provision that allows ODE to remove funds of non-compliance from current standards, as stipulated in Ohio Revised Code
- Incorporate funding parameters to ensure gifted earmarked funding is spent as intended in HB 59
- Incorporate data collection on specific inputs to determine effect
- Increase scope and depth of the written education plan and a reasonable attempt to require parent signature

OAGC recommended language changes are highlighted in **Yellow**.

Section (Numbering is based on September 5 draft)	2008 Operating Standards (numbering may differ, comparable section referenced)	Gifted Advisory Committee (GAC) Recommendation	Current Draft as of September 5	Potential Consequences	Recommendation
Introduction 3301-51-15 page 2 first paragraph.	N/A	Add the following statement “These operating standards apply to all districts and gifted education programs regardless of the type of funding specified by state law.”	All references to funding removed from document.	Gifted children, parents, and taxpayers need to know their education will not be forfeited because of the funding source. This rule must apply to all schools in Ohio, regardless of the funding method and regardless of the school attended so all gifted children have equal access to an appropriate education. Since all districts will receive gifted funds in some fashion, this stipulation (or lack of) will not have the same impact it would have if some districts did not receive gifted funds, as in the past. However, it should be noted that the funding formula for gifted has changed three times in five years. In order for the Rule to be relevant beyond this biennium, the GAC recommended language should be included in the introductory paragraph.	Reinstate the GAC language as the second sentence in the first paragraph, “3301-51-15 Operating standards for identifying and serving gifted students. These Operating Standards for Identifying and Serving Gifted Students apply regardless of the type of funding specified by state law. <u>Services to gifted students may only be reported to parents and the department of education when compliant with the Operating Standards for Identifying and Serving Gifted Students.</u>

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(B) General – Page 2	(1) All minimum standards for elementary and secondary schools shall be followed for children who are gifted.	(1) All minimum standards for elementary and secondary schools shall be followed for children <u>students</u> who are gifted.	(1) All minimum standards for elementary and secondary schools shall be followed for children students who are gifted <u>receive gifted</u> <u>services.</u>	The statement as it stands is in conflict with the purpose of the document—Operating Standards for Identifying and Serving GIFTED students. To serve children who are not identified as gifted is contrary to the purpose of this document. Gifted children who are not served must not be discriminated against. Minimum standard should apply to them as well as students who are served.	Reinstate the GAC language, (1) All minimum standards for elementary and secondary schools shall be followed for <u>children students</u> who are gifted.
C(2)(b)(ii)(a) Testing individual students from referrals -- page 4	N/A	Make the proposed timeline 90 days for testing students for their initial referral only.	Make the proposed timeline 90 days for testing students for their initial referral only.	Students who have never been tested will not have to wait for assessment or, potentially, for services for an unreasonable time. Limiting to initial referral reduces burden on coordinators and districts. Ensures students already in the district who have never been tested do not have to wait longer than new students for testing. If there is a “rush” on initial referrals, it could be difficult for coordinators in multiple or large districts to manage requirement.	No change from September draft needed.

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C(2)(b)(iii)(a)) and (b) Whole grade screening opportunities – page 5	Two opportunities to be tested per year, no whole grade screening requirements	Whole grade screening required twice - at least once in grades K-3 in superior cognitive abilities, reading, and math and at least once in 3-6 in superior cognitive abilities and all four subject areas	Whole grade screening required twice - at least once in grades K-3 in superior cognitive abilities, reading, and math and at least once in 3-6 in superior cognitive abilities and all four subject areas	This gives students additional opportunities to demonstrate giftedness and allows for more students to be considered. Students missed in earlier testing due to school experiences, transfers, or other reasons can be identified later. Children will benefit by having current data to steer program design and placement at each school level. It is clear from the number of districts that do not even qualify for a value- added grade in the subgroup that districts are not following the identification laws with integrity.	OAGC strongly supports this change.
C(4)(b)(iii) Test administration qualifications – Page 7	Requires those administering tests to meet criteria set by testing companies	Add “and in accordance with state law.”	Not added	Test administrator qualifications required by testing companies are sometimes less stringent than Ohio Revised Code Section 4732.5.1. This periodically causes confusion in the field regarding who may assess students.	Reinstate the GAC language that be included to ensure that ORC is followed, “(iii) Are administered by qualified personnel in conformance with the instructions provided by their producer and in accordance with state law.”
C(4)(d) Testing accommodations	Tests selected with student exceptionalities in mind	Add a phrase that allows IEP/504 accommodations if they align with test’s allowable accommodations or recommend alternative testing tool	If the accommodations in a student’s IEP or 504 plan interfere with the test’s allowable accommodations, a comparable test will be selected.	This statement ensures students’ accommodations are met without compromising the validity of a test administration. Districts with limited testing instruments will need to find alternative measures on the approved list.	OAGC supports this recommendation.

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D Services introduction	Refers to benchmarks and indicators when discussing standards			Reflects current state curriculum terminology	No change needed from the September draft.
D(3)(a) WEP development – page 8	N/A	N/A	Allows a coordinator that has no background in gifted education to develop a written education plan.	Because of the unique academic and social/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 plans need to be written to ensure best practice, just as occurs for other special needs populations.	Change language to: <u>(a) The Written Education Plan (WEP), developed in collaboration with an educator with gifted licensure or a coordinator of gifted services, shall provide a description of the services to be provided including:</u>

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D(3)(b) WEP signatures and timeline – page 9	None required	Add a requirement that WEPS are provided within 30 days of service start and reasonable attempt to gain parent signature is made	No change	Parents need to know the educational goals for their children, but they do not always receive WEPS. The time and signature requirement would improve that. The “reasonable attempt” clause recognizes that despite multiple attempts, parents do not always return forms to school.	Reinstate the GAC language that the district make an attempt to get a parent signature for service. D(3) (b) <u>Parents and all educators responsible for providing gifted education services to the student, including teachers providing differentiated instruction in general education settings, shall be provided a copy of the WEP. A reasonable attempt will be made to obtain a parent signature on the WEP.</u>

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D(4)(a) Class size limits for GIS courses – page 9	20 students maximum in elementary classes and 25 in secondary classes	Change maximum caseload to 25 students for all grade levels.	Caseload removed.	<p>Gifted students in classes with no maximum size could find it difficult to gain individual attention. This is especially problematic for students who absorb information at an astounding rate. In addition, students in classes with overburdened teachers may not have access to advanced material because the teacher is responsible for too many schedules with too many students. In designing a WEP, teachers need to know their students, and their needs. When classes are too large it becomes an impossible task to meet the needs of students and WEPs will not adequately match the needs of the individual students. Districts can serve as many students as possible in a teacher's day and physical space. Service quality will decrease due to lack of personal attention to the WEP process and differentiated instruction need of students. The emphasis on the new "opportunity ranking" in the gifted ranking system will provide a perverse incentive for districts to increase class sizes beyond the capacity of the gifted intervention specialists to provide meaningful service.</p>	<p>Reinstate GAC language that increased caseload from current law and include wavier language.:</p> <p><u>(a) Gifted services guided by a Written Education Plan (WEP) and taught by a gifted intervention specialist to students identified as gifted, for a specified number of minutes. The gifted intervention specialist shall provide students and parents periodic reports on student progress pursuant to meeting the goals of the WEP. Such instruction may be provided in large groups, small groups, and /or individually. The department shall establish policies and procedures for granting temporary waivers to districts related to paragraphs (D)(4)(a)(i) through (D)(4)(a)(v) of this rule for districts receiving an "A" grade on their Gifted performance indicator and specify and report output measures approved by the department to ensure adequate levels of service are provided.</u></p>

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D(4)(a)(1) – (v) Time requirements for GIS courses – page 9 and 10	225 minutes maximum in elementary classes and 240 minutes in secondary classes	No change	All time requirements removed.	<p>Without minimum times, parents and the general public will not be able to make comparisons between districts who claim to offer gifted services. There will be no consistency nor common understanding of what is and what is not a service. Many of the report card indicators and other factors for this population will become insignificant if there is no common definition of what that service entails. Services can be as comprehensive as all day every day or as watered down as a half day a year. Lack of service time requirements does not acknowledge a child’s giftedness all the time. Accountability becomes meaningless because outcomes cannot be compared if inputs are not clearly defined.</p> <p>More disturbing, children would not have the necessary time to adequately delve deeply into topics, explore, research, experience and participate in inquiry activities on a consistent basis. The minimal time limit ensures that differentiation activities can flourish to encourage the children’s creativity and innovation.</p>	<p>Replace current draft language with current and GAC recommended language: (D)(4)(a)</p> <p><u>(i) Full-time self-contained classroom where the gifted intervention specialist is the teacher of record with a maximum of twenty-five gifted students;</u></p> <p><u>(ii) Single-subject self-contained classroom where the gifted intervention specialist is the teacher of record with a maximum of twenty-five gifted students at any one time and a maximum caseload of one hundred twenty-five gifted students-Each student served in this setting shall be provided instruction no less than an average of two hundred twenty-five minutes per week throughout the course at the elementary level (kindergarten through grade five) and no less than two hundred forty minutes per week throughout the school year at the secondary level (grades six through twelve);</u></p> <p><u>(iii) Resource room with a maximum of fifteen gifted students at any one time and a maximum caseload of seventy-five gifted students. Each student served in this setting shall be provided instruction no less than two hundred twenty-five minutes per week throughout the school year at the elementary level (kindergarten through grade five) and no less than two hundred forty minutes per week throughout the school year at the secondary level (grades six through twelve);</u></p>

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					<p><u>(iv) Co-teaching where the general education teacher is the teacher of record. Each student served in this setting shall be provided instruction by the gifted intervention specialist no less than an average of two hundred twenty-five minutes per week throughout the course at the elementary level (kindergarten through grade five) and no less than an average of two hundred forty minutes per week throughout the course at the secondary level (grades six through twelve). Services are provided through co-teaching with the general education teacher. Several gifted students are deliberately placed (clustered) with a general education teacher who has received professional development in differentiating instruction for gifted students and is designated as a provider of differentiated instruction on students' WEPs. Both teachers provide instruction for the entirety of the co-teaching time. The gifted intervention specialist and general education teacher shall be provided with regularly scheduled collaborative planning time; and</u></p> <p><u>(v) In a clustered group setting where a licensed gifted intervention specialist is providing services in the general education classroom for no less than an average of two hundred twenty-five minutes per week throughout the course at the elementary level (kindergarten through grade five) and no less than an average of two hundred forty minutes per week throughout the course at the secondary level (grades six through twelve).</u></p> <p><u>(vi) Educational options, credit flexibility, internships or mentorships specified on gifted students' WEPs where the total caseload does not exceed one hundred twenty-five students.</u></p>

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D(4)(b)(i) General education service setting – page 10	Requires general education teacher providing regular classrooms services to have high quality professional development and ongoing support	Consensus was never reached as this was to be discussed in the August meeting that was canceled. Research supports an option included 24 hours the initial year and 6 each year thereafter with possibly waiting to give credit for service until the second year (from gifted coordinators). Without this level of support, research shows this model is ineffective and not best- practice.	Requires these teachers to either obtain gifted licensure or possess specific knowledge and skills. Ongoing support does not have to be from a person with gifted licensure.	Most teachers and administrators have had no gifted courses in their undergraduate or graduate programs. The poor gifted subgroup value-added scores strongly suggest that many general education teachers have no idea how to teach gifted children. Not specifying qualifications would mean no change in teacher preparation prior to working with gifted students. The currently proposed language is vague in terms of who decides and how to measure high quality professional development. Without a gifted licensed individual to provide on-going support, children will lose the people who most understand how to differentiate for this population. General education teachers with a wide spectrum of abilities in their classes, despite being well-meaning, spend the bulk of their time with struggling students. Gifted children often suffer because teachers do not understand them, and in some cases do not like them Research consistently shows that without specific intensive training and support and specially designed curriculum materials, this is an ineffective service model, and it would be unwise to expect positive outputs from this practice.	OAGC recommends that any grade-level general education classroom teacher other than in a co-teaching model and cluster group model as defined in Section D (4)(a)(iv) and (v) must have a gifted intervention specialist license for the setting to be counted as service: (b) General education settings with instruction guided by a WEP taught by a general educator who shall possess a gifted intervention specialist license. the competencies and experiences and participate in professional development to meet the individual gifted student's needs. The general education teacher shall receive on-going support for the provision of gifted services to students. The general education teacher shall collaborate on the development of the WEP, shall be designated on the WEP as the gifted service provider and shall be provided a copy of the WEP. The general education teacher shall provide students and parents periodic reports on student progress pursuant to meeting the goals of the WEP. (f) General educators providing gifted services in a general education setting shall either: (a) In a general education classroom with cluster grouping obtain have gifted licensure. (b) In an Grade Levels Honors setting, possess the skills and knowledge in an subject-specific to: (i) Differentiate instruction for gifted students based on a student's readiness, knowledge and skills, including the differentiated features of acceleration, complexity, depth, challenge, creativity and abstractness. Educators shall select, adapt, or create a variety of differentiated curricula that incorporate advanced, conceptually challenging, in-depth, distinctive and complex content that: (1) Provides access to appropriately advanced curriculum content, including replacement or extension of the general education curriculum; (2) Modifies the learning process to provide an appropriate level of challenge, including the use of strategies for curriculum compacting; and, (3) Modifies or replaces assignments and projects with alternatives based on the student's needs and abilities.

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D(4)(c) Additional educational settings – support from gifted educator – page 11	N/A	Stipulate settings require support from educator with gifted licensure when developing/imp lementing the WEP	No change	Just as math students require teachers licensed in math, reading students require teachers certified in reading, and special education students require teachers certified in special education, gifted students require teachers certified in gifted. Without personnel who specialize in providing gifted services, gifted children may not have their needs met by the generalist. Students may begin to underachieve and drop out of school. Educators, without gifted licensure, responsible for additional settings in gifted education may not be able to develop an appropriate WEP. Even when students with disabilities are served in general education classrooms, their IEPs are developed by special education personnel.	OAGC recommends that GAC language be reinstated: <u>(c) Additional general education settings with instruction guided by a Written Education Plan (WEP) taught by a general educator who shall possess the competencies, experiences and professional development to meet the individual gifted student’s needs. The general education teacher shall receive on-going support for the provision of gifted services to students. These settings require the support from an educator with gifted licensure regarding the development and implementation of the WEP. The general education teacher shall collaborate on the development of the WEP, shall be designated on the WEP as the gifted service provider and shall be provided a copy of the WEP. The general education teacher shall provide students and parents periodic reports on student progress pursuant to meeting the goals of the WEP. Additional general education settings with instruction guided by a WEP where the district is paying for the cost include but are not limited to:</u>
D(4)(c) Additional educational settings – cost – page 11	N/A	Stipulate the additional settings must be provided by the district as opposed to paid for by the student or family	Add phrase “and the district is paying for the options”	All eligible students are ensured equal access to the service settings.	OAGC agrees that service settings must be paid for by the district.

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D(4)(c)(iv)	Credit flexibility is not mentioned	Add credit flexibility in the services section.	Credit flexibility is present.	Allows gifted students to utilize alternative learning options for high school credit in order to maximize opportunities for advanced courses and PSEO, among others. Without proper guidance, routine credit flex that is not advanced in content or accelerated in pace might be inappropriately called a service.	See recommendation for (D)(4)(c)
D(4)(c) Additional service settings – counselor	Guidance listed as a service option	Suggested moving guidance out of the service category altogether and just allow it to be something that is incorporated in a WEP as a support to students rather than classified as a formal service.	Guidance was removed as a service option.	Gifted children need support from individuals who understand the needs of such students. Guidance is important to the social and emotional support of gifted. However, as it should be available to all students, classifying it as a unique service may be inappropriate.	No change needed from the September 5 th draft.
D(5)(b) Differentiate d instruction strategies – page 12	All listed as “mays”	All are “may include...but not limited to...”	All are “may include...but not limited to...”	Provides multiple options for differentiating for students based on individual needs. Does not establish core list of strategies to be used.	No change needed from the September 5 th draft.

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E(1) Coordinator qualifications – page 16	Master’s degree, gifted endorsement or license, 3 years teaching experience, and administrator license (only if supervising teachers)	Maintain existing plus add a comment limiting use of waivers.	Qualifications ONLY include administrator license if supervising teachers and training in the operating standards.	Children without having the support and understanding of a licensed gifted coordinator will suffer under this plan. Just as special education supervisors have to look at what is best for the special education child, the gifted coordinator does the same. A special education supervisor needs a special education license, a principal needs a principal license. Will an administrator with many other duties, including the entire observation cycle dictated by OTES have the time and inclination to address the varying needs of gifted students? This allows districts to make anyone a gifted coordinator, regardless of education, experience, or training. This means decision makers could be teachers, building principals, or even school secretaries. Decisions will be made regarding the education of a special needs population by people without knowledge of the unique developmental and educational needs of the population.	OAGC recommendation. Reinstate current language: (E) Personnel <u>(1) Coordinators of gifted education</u> (a) Qualifications: <u>(i) Ohio intervention specialist license for gifted education, and</u> <u>ii. Ohio administrative specialist license, if the coordinator is to supervise teachers;</u> <u>(iii) evidence of at least three years of successful teaching experience, and</u> <u>(iv) a Master’s degree</u> <u>(ii) Documented training in gifted operating standards.</u>
E(1)(b) Gifted Coordinator required – page 16	N/A	Add a bullet that indicates districts who report gifted services must have a gifted coordinator.	States coordination is required, but does not specify by whom.	Requiring a licensed, gifted coordinator ensures decision-making for and about children at the district level follows best practices in gifted education. The coordinator can verify legal compliance, implement best-practice policies and provide professional development to staff.	Change (E)(1)(b) to indicate an actual coordinator has to provide coordinator services: <u>(b) Each district shall provide for coordination of services with a coordinator who has gifted licensure.</u>

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E(1)(c) Gifted Coordinator workload – page 16	N/A	Add some caseload/workl oad limit to coordinators.	Language reflective of the workload study for special education was added.	Children lose out if coordinators are assigned to too many districts to effectively design, implement and monitor effective identification procedures and services. If implemented with the time study suggested, this would give a realistic view of the time requirements to do different job responsibilities. There is no mathematical formula to use, and doing the time study is a lengthy and complicated process. Districts desiring a quick solution will not take the time to do so.	OAGC would like to review the effectiveness of the workload calculation as it is implemented.
E(1)(e) PD for Gifted Coordinator – page 18	N/A	Requires gifted coordinators participate in professional development related to gifted identification and service each year	Requires gifted coordinators participate in professional development related to gifted identification and service each year	Gifted personnel have access to timely professional development responsible to their job responsibilities.	No change needed from September 5 th draft.

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E(2) GIS use of time – Page 18	Gifted Specialists must spend 75% of their time in direct instruction to gifted students.	Add a sentence indicating the other 25% of the instructional time is to be spent supporting gifted students directly or in collaboration with other teachers who work with gifted students.	Gifted specialists should be provided adequate planning time.	Instructional time for gifted students is reduced when gifted specialists are assigned to extra bus or lunch duties. That is not a good use of human resources. More gifted children can be served when GIS are not pulled from gifted services to teach non-gifted children, especially in intervention programs with struggling learners. GIS do not have the expertise to work with that special population, just as special education teachers do not know the strategies that work best with gifted learners. By allowing gifted specialists to spend 25% of their time as a resource, they can consult and share strategies with other teachers, model teach, or converse with parents, so that even more children will benefit.	Reinstate GAC language: (a) <u>A gifted intervention specialist shall provide instruction directly to gifted students for no less than seventy-five per cent of the time. Up to twenty-five per cent of the gifted intervention specialist's time may be dedicated to other duties that support gifted education services but do not necessarily entail working directly with students, such as consulting with general education teachers, developing and sharing differentiated instructional resources or advising parents of gifted students. For gifted intervention specialists assigned to more than one service setting, the maximum caseload for each setting must be reduced in proportion to the time assigned to each setting.</u> Gifted intervention specialists shall be provided sufficient time for designing their work, evaluating student progress, conferencing, and team planning consistent with paragraph (A)(9) of rule 3301-35-05 of the Administrative Code.
E(2) GIS planning time – Page 18	75% of time spent on instruction, up to 25% other duties	75% of time spent on instruction, up to 25% other duties directly in support of gifted education such as consulting with general education teachers, developing/sha ring resources, etc.	Teachers have sufficient planning time	Without clearly defined planning time, gifted children may not have the benefit of well- structured lessons. There is inconsistency in the amount of collaboration districts allow, which means effectiveness of co-teaching or supported teaching is varied. Scheduling the collaborative time can be difficult.	See above recommendation

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E(2) GIS Caseload – Page 18	Maximum caseload is 60	Change maximum caseload to 75 students	Caseload removed. There is not even language reflecting the workload study, like there is for coordinators.	Children whose teachers have too many assigned students (especially when coupled with the lack of minimum service minutes) may not be given the supports needed when advanced work is assigned. Teachers will have less time to provide extra instruction and address gaps in learning. Districts can serve as many students as possible in a teacher’s day and physical space. Service quality will decrease due to lack of personal attention to the WEP process and differentiated instruction need of students.	Caseload addressed in instructional setting recommendation for (D)(4)(a).
E(2)(b) PD for GIS	N/A	Requires gifted intervention specialists participate in professional development related to gifted identification and service each year	Requires gifted intervention specialists participate in professional development related to gifted identification and service each year	Children will benefit from a GIS has access to timely professional development. New activities, strategies, or programs help teachers further enhance the learning in the classroom and address the needs of this special population.	No changes needed to the September 5 th draft.

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E(3) PD for General Education	Requires general education teacher providing regular classrooms services to have high quality professional development and ongoing support	Wording that references D(4)(b) for general educator qualifications	Wording that references D(4)(b) for general educator qualifications	Issues with this are because of the issues described for D(4)(b).	<u>(3) The general educator providing gifted services shall possess the competencies, experiences and professional development to meet the individual gifted student's needs as specified in (D)(4)(b) of this rule. The general education teacher providing gifted services shall participate each year in high quality professional development related to teaching gifted students.</u>
F Funding accountability			All funding language removed.	This is contrary to ORC and removes any level of transparency for funding and accountability. See new section below for more details.	OAGC recommends that a funding section be added. See below in last section

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F Student accountability - 22 and 23	N/A	Include wording that the operating standards would apply to gifted indicator and state/district report card implementation	Much of the suggested advisory council language is removed, Also, the language in ORC that allows the department to remove funding to non-compliant districts. This is contrary to the intent of ORC.	In the gifted annual report, for the benefit of gifted children, ODE should be able to determine if districts are implementing the operating standards with integrity. Districts have failed to comply with the law and will continue to do so unless sanctions occur. Moreover, the proposed GAC language would have made the connection to accountability more explicit. In addition, Ohio Revised Code stipulates sanctions for districts that are not in compliance. The removal of this provision defies the intent of Ohio Revised Code.	<p>OAGC recommends reinstating the GAC recommendations as well as additional language that strengthens accountability. Also, ORC provision reinstated for non-compliant districts:</p> <p><u>(F) (1) Student Accountability. The Operating Standards for Identifying and Serving Gifted Students apply in the implementation of requirements for any gifted indicators on state or district report cards.</u></p> <p>(4) (2) Each district shall submit an annual report to the department of education specifying the number of children in each of grades kindergarten through twelve screened, the number assessed, and the number identified as gifted in each category specified in section 3324.03 of the Revised Code.</p> <p>(2) (3) Each district shall participate in an audit of the district's gifted education data {including numbers screened, assessed, identified and served by grade, gender, race, disability, economic disadvantage and English language proficiency and appropriate assignment of gifted <u>and general education staff</u> <u>and/or operating standards procedures</u> at least once every three years or more frequently if randomly selected, or based on complaints, or suspicion of non-compliance by the department of education.</p> <p>(a) Districts shall be provided an opportunity to validate the data used for the audit and to respond to the audit findings.</p> <p>(b) The department of education shall provide technical assistance to any district found in noncompliance with this rule.</p> <p>(c) Districts found to be noncompliant shall develop and implement a corrective action plan approved by the department of education.</p> <p><u>(3) (4) The department of education may reduce funds received by the district under Chapter 3317 of the Revised Code by any amount if the district board of education continues to be noncompliant.</u></p>

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F(3) Self-report	Annual report required	Incorporate requirement to submit names of general education teachers providing services and the level/amount of HQPD and ongoing support they received.	No change	Without district accountability the annual report is a worthless document. Therefore additional items need to be included to evaluate how effectively districts are identifying and serving gifted students in Ohio. Especially important are the ratios of served students to their teachers, both GIS and general educators (if counted as serving gifted students, the number of WEPS and WAPS and the involvement of gifted licensed individuals in creating those documents, and the types and frequency of professional development. Without validated HQPD, gifted children will suffer the same treatment they have always had—read a book in the back of the room until the rest of the class catches up. There is currently no mechanism to account for the presence of quality HQPD and support for general educators providing gifted services, nor is there a gifted certified individual required to guide the PD. See earlier notes.	<p>(4) (5) The district shall prepare an annual written report on the effectiveness of the identification of and services to students who are gifted. The report shall be submitted to and submit to the department of education by July fifteenth of each year. The report also include such as elements but is not be limited to:</p> <p>(a) the number of licensed gifted intervention specialists and coordinators providing gifted services in the district;</p> <p>(b) the number of general educators providing gifted services in the district;</p> <p>(c) the number of gifted students who are on a written acceleration plan;</p> <p>(d) the number of gifted students identified and served in each area of giftedness by grade-level;</p> <p>(e) state and local funding spent on identification, licensed gifted personnel, gifted professional development, gifted materials and supplies, gifted curricular materials, transportation, other</p> <p>(f) for general educators providing gifted services the report shall specify:</p> <p>(i) the names of all general education teachers providing gifted services and their qualifications;</p> <p>(ii) the level and amount of high quality professional development related to teaching gifted students or gifted coursework received by each general education teacher providing gifted services; and</p> <p>(iii) the level of ongoing assistance from an educator with gifted licensure received by each general education teacher providing gifted services.</p> <p>(g) any other gifted data elements related to gifted outcomes reflected on the district report card.</p> <p>the department shall make the information available to the public in an easily readable format</p>

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Funding		Add the following statement (or something similar) at the beginning: “These operating standards apply to all districts and gifted education programs regardless of funds received from the state by a school district.”	All funding language removed.	Gifted children become the educational paupers when funding intended to further their education is reallocated to other programs. It sends a distinct message that these children do not matter. Districts under this draft can spend gifted funds as they wish, which is contrary to Ohio Revised Code. There need to be two sections of gifted funding: 1. For districts under the district formula in ORC. 2. One for ESCs in the unit funding formula outlined in ORC. Since all districts will receive gifted funds in some fashion, this stipulation (or lack of) will not have the same impact it would have if some districts did not receive gifted funds, as in the past.	<p>Add funding section:</p> <ol style="list-style-type: none"> 1. <u>For any district or educational service center provided state gifted funding through unit-based funding methodology in place under division (L) of section 3317.024, division (E) of section 3317.05, and divisions (A), (B), and (C) of section 3317.053 of the Revised Code as they existed prior to fiscal year 2010 the following shall apply:</u> 2. <u>For any district or educational service center provided state gifted funding through the foundation formula, the following shall apply.</u> <ol style="list-style-type: none"> a. <u>Any state gifted funding in the foundation formula for gifted identification shall be expended on the screening, assessment, and identification of gifted students.</u> b. <u>Any state gifted funding in the foundation formula specified for gifted coordinators shall be expended on gifted coordinators with gifted licensure. Districts may assign any gifted funding for coordinators to another district, educational service center or STEM school as part of an arrangement to provide gifted services.</u> c. <u>Any state gifted funding in the foundation formula specified for gifted intervention specialists may be expended on gifted intervention specialists with gifted licensure. Districts may assign any gifted funding for coordinators to another district, educational service center or STEM school as part of an arrangement to provide gifted services.</u> 3. <u>Districts may not use state gifted funding to fund general education classroom educators or for services provided to all students. The department of education shall track and ensure compliance with all gifted expenditures.</u>