May 18, 2019 Email from Dr. Colleen Boyle to the State Board of Education Re: Gifted Assessments

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

I am writing with regard to the recently released *Chart of Approved Assessments* as it pertains to instruments to be used for gifted screening and identification. This is the second year instruments for gifted identification have been reviewed using the Department's consolidated process, and this is the second year the results have been problematic. It is my understanding, based on past conversations with Department staff, that the process used was to increase efficiency, provide more consistent and unbiased reviews, and, in response to requests from the 2017 Superintendent's Assessment Advisory Committee, increase the number of options for districts to use when assessing students for a variety of purposes. Unfortunately, for the second year in a row, none of those goals were met.

Let me start by highlighting was WAS improved this year over last year. Following my communication with Superintendent DeMaria and the board last June, staff from the Department did engage stakeholders in conversations about the process and our concerns. I and some of my colleagues have been invited to a handful of meetings to discuss our needs from this process, to review the RFQ, and to provide general feedback along the way. We appreciate the attempts to engage us in conversation. I believe the staff tasked with creating the list want to get it right.

But, the narrow expertise of Department staff, determined efforts to have a single process for all types of assessment, and the bureaucracy of a state agency undermined the potential benefits of such collaboration. Let's begin with the goal of efficiency. The RFQ promised "early this fall" (as in Fall 2018) was finally released to vendors at the *start of March*. Vendors then had to notify the Department of intent to apply by March 6 and have their full application together by March 15, which created problems for quality submissions. The list promised to the public by March 29 was not released until April 26, creating challenges for some districts with regard to budgeting for any required purchases for next year due to changes. This timeline was anything but efficient.

Second, the goal of this process was to provide more consistent and unbiased reviews. Unfortunately, in doing so, the reviews lacked the expertise needed to make decisions in line with the technical and practical application of these tools. This should have been evident during the revisions of the RFQ. The RFQ included more than 70 metrics because of the wide range of applications of the assessments covered by it. Gifted assessments, alone, take four very different formats: ability tests, achievement tests, behavioral checklists, and performance rubrics. The technical development, reporting, administrator credential requirements, and practical application look different among the four, and each is used for a very specific purpose within Ohio law. Those four types of tools cannot be reviewed the same way despite all falling under the umbrella of gifted identification. This RFQ covers those four types of tools PLUS instruments for determining 3rd Grade Reading Guarantee status, teacher evaluations, high school graduation eligibility, and more. Those very disparate purposes should be a major sign that a single process is not appropriate.

Additionally, the technical standards for gifted tools exceeds that of the other purposes because of the long-term implications of gifted identification. A review of last year's RFQ rubrics revealed that raters did not always require vendors to provide submission of validity of an instrument for the purpose of gifted identification specifically, did not know or confirm reasons why some vendors had been refused approval in past applications under the old process, and inconsistently applied technical standards across instruments. The Ohio Association for Gifted Children requested additional information be

requested of vendors by the Department during this year's review for some instruments due to the gaps in last year's data. Receipt of that request was acknowledged by the Department, but there was never follow up. When OAGC cited specific concerns about the technical aspects of one test in particular, the Department's response was to have OAGC meet with the vendor, who then requested OAGC provide data to verify our concerns rather than require the vendor to provide the appropriate evidence to validate their application. OAGC also requested that someone with credentials in gifted education who had training in the technical aspects of psychoeducational assessment be part of the review team since no one on staff at ODE possesses that combination of expertise. The request was refused. The Gifted Advisory Committee, which was assembled by the Department, made the same request repeatedly during meetings and in writing. That request was dismissed. I struggle to understand why the Department would ignore the direction from a multi-stakeholder group it assembled, for the purpose of advisement, especially for such an important issue.

Finally, the third goal was to increase test options for districts. The length of the list is a visible indicator that this process had the opposite effect than what was intended. The list in 2017-2018, the last year the process for gifted assessment reviews was done by a specific committee for that purpose, included more than 50 different assessments to fulfill the various aspects of gifted identification under state law. The 2019-2020 list has less than half of that with only 24 approved instruments. Of particular concern is the lack of any instrument for identifying students as gifted in visual or performing arts, which means districts cannot fulfill their legal requirement to identify students in that area. There is also a lack of foreign language instruments and individual psychological assessments commonly used to identify gifted students who are English learners, have a co-existing disability, or are primary age. Representatives from the Department indicate this is due to a lack of applications. Feedback from vendors indicate the lack of application was due to not having information about the RFQ or the turnaround time (2 days for notification of intent and less than 2 weeks for the full application) was not sufficient for them to prepare the application, especially if they publish multiple assessments. These are all vendors who have previously submitted information and had their tests reviewed AND APPROVED for use for gifted identification in the past. They view this new process as too cumbersome to be worth their time and energy to jump through bureaucratic hoops repeatedly. And our students suffer. How many students from groups who are already underrepresented in gifted programs will be at an even greater disadvantage because of this process? Districts now have significantly fewer options for identifying gifted learners than they did under the old process, which flies directly in the face of the request of the Superintendents Assessment Advisory Committee.

I hope what we all have learned from this process is that the world of assessment should be highly purpose-driven, and, as such, a "one-size-fits-all" approach won't work, not to mention is just bad practice. The Department has tried this approach for two years now, and that is long enough to understand it isn't working. The fix is straight forward. I am asking that we return to the previous process that ensures the right tools are approved for the right job by assembling a team to specifically review instruments for gifted assessment, and that team should include psychometricians from the Department, a school psychologist, a gifted coordinator, and another individual with expertise in gifted education and psychological assessment. Additionally, I am requesting the instruments on the 2017-2018 list continue to be approved for use for gifted identification, without condition, without expiration date (except for instruments no longer being published or with out of date norms) and without requirement for future resubmission.

I appreciate your consideration of this important matter.

Sincerely,

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