

Good afternoon. I was hoping a follow-up email would not be necessary, but unfortunately, with the release of the approved assessment for gifted identification list, there are some significant concerns that impact children and districts. For the board members on this thread, you will see my original email to Superintendent DeMaria at the bottom of the thread, which was originally copied to you. You can also follow the subsequent email conversation that followed.

In the reply to me two days before the release of the approved list, Superintendent DeMaria stated, "From a broad perspective I believe that none of these issues have in any way compromised or denigrated Ohio's system of gifted identification." I was so hoping that would be the case when the list was finally released, but unfortunately, my fears became a reality. While I do not believe anyone involved with the test approval process intended anything negative, the new list of approved instruments, specifically speaking about those approved for gifted identification, creates numerous issues for children and districts. My specific concerns and recommendations are as follows:

1. **There are no instruments approved for creative thinking or arts identification.** This creates a major issue in that it does not allow children with talents in these areas to be identified until the list is updated once again, which means it does not allow districts to comply with either the law or the operating standards. The law clearly directs districts to identify children in grades K-12 as gifted in those areas. However, without instruments approved to identify children as such, which ODE is directed to approve, districts cannot follow law. Additionally, the operating standards direct districts to screen all children in two different grade levels in creative thinking ability, Again, we cannot comply with this directive if no instruments are approved for our use.
2. **There are no high school instruments approved for use.** ACT, SAT, and PSAT, all of which are solid, well-designed and long-used instruments for gifted identification, are no longer on the approved list. Because districts administer either the ACT or SAT to all students, this essentially removes an opportunity to screen high schoolers for potential giftedness. Additionally, the ACT was previously approved for use as an above-level measure for younger children, and that now is no longer possible. Research shows that gifted children often cannot be properly evaluated unless an out-of-level assessment is used in order to

avoid ceiling effects of on-level assessments. This option for schools to recognize the scores of these instruments ties our hands when it comes to identifying and properly designing service plans for highly gifted children.

3. **The vast majority of individually administered intelligence and achievement tests are no longer on the list.** While definitions and qualifications for gifted identification vary state to state, it is student performance on these types of individually-administered tests that are universally recognized evidence of giftedness. With the current list of approved instruments, if a child scores in the gifted range on a test administered during a full psychological evaluation for special education qualification, the child now will have to be retested with additional instruments in order to be officially identified as gifted. That contradicts one of the stated goals in the RFQ of reducing the amount of testing children experience. And, it doesn't make sense conjuring the different tests themselves. It is inconceivable that our state will not allow a more nuanced, recently updated, and more reliable tests, such as the Wechsler intelligence or achievement scales but will accept a less reliable, older, group-administered test like the Inview. These individual tests are critical tools for identifying gifted children with other exceptional traits, whether it be students who are also English Learners, have a co-existing disability, or attention issues that impact ability to focus in a group setting, or have emotional or sensory sensitivities that make group testing more anxiety-ridden than individual testing. Without the ability to use these individual tests, it will be nearly impossible to identify children who do not fit a stereotypical, high achiever mold. That will exclude countless children from gifted identification and services and will create a larger identification gap, not reduce it.

According to the FAQ, the absence of these instruments is because publishers did not submit them for review. I go back to my earlier stated concerns about the rubric and process as a whole, as I believe they explain why instruments were not submitted. First, the process was meant to be more efficient for publishers and the department, yet is not efficient for a publisher to have to resubmit a request for approval after already having been approved, especially if the nature of the instrument is specific to gifted identification only and not connected in any way to the other purposes for approval (3GRG, SLOs, etc.). Nor is not efficient for the Department to have to re-review a panel of instruments previously approved for this yes. Looking at the RFQ, it is a daunting document that could easily overwhelm a publisher

who has already jumped through the hoops for the department to be approved and has no need for other approvals. Second, as I shared in my first email, the rubric is flawed. While the Superintendent noted that reviewers within the Department would have additional resources to be able to look past any nuances that were inconsistent with law or policy, publishers, unfortunately, did not have that same resource. If a publisher of a creative thinking checklist saw the rubric requiring them to have both a standard score for IQ and a checklist score (which is an unreasonable request for a single instrument and a misinterpretation of the law), why would they submit it for review knowing they won't qualify? There are other pieces that were not hard and fast pass or fail that discouraged publishers, as well. At least one publisher reached out to a representative from the OAGC to indicate they would not be on the approved list because they did not have one particular piece of evidence - despite a past committee previously revising their extensive evidence of appropriateness and approving them. I would argue the flawed rubric and process, as a whole discouraged publishers from submitting instruments.

As someone who was an active member of the State Superintendent's Advisory Committee on Assessments, which was referenced as a driving force within the RFQ introduction, I can assure you this outcome was not at all what the group intended when it requested a list of common approved instruments. The goal was to increase choices for districts, not restrict them. **However, the solution to the issues listed above is simple: Allow instruments previously approved for gifted identification to carry over to the new list.** Doing so will allow districts to comply with gifted identification laws, will ensure high school students and students who have multiple exceptionalities are not overlooked, and will save both publishers and the Department time and money.

I wish this was the end of my list of concerns, but I have three others. **First, the list does not provide a grace period for districts with using instruments that are going off the list.** (This would primarily apply to Naglieri Nonverbal Ability Test 2nd Edition and Iowa Test of Basic Skills Forms A and C, plus possibly Stanford 10 and Otis Lennon School Ability Test 8th Edition.) In past years, the Department decided to allow up to 18 months for districts to use instruments going off the list. This has financial implications. When an instrument goes off the list, any remaining materials must be destroyed - essentially throwing district funds away. Then, additional funds have to be spent to replace those instruments with newly approved

tests. When a grace period was included, districts had time to adjust their purchasing of tests to phase out one and phase in another, thus being good stewards of public money. This grace period occurred even when decisions were made in December or January about test approval. But, with this round of approvals, the department has decided no grace period for a test list released in June before it goes into effect. As districts have ceased spending for this fiscal year, they have likely spent money to purchase assessments to replenish their stocks based on the previous list - the only one available at the time of purchase. In my district alone, we would need to destroy tens of thousands of dollars of assessment materials - not including the creativity and arts checklists that have gone missing from the list - and then spend tens of thousands of dollars more to replace those materials for testing that will be requested by families next year. This comes on the heels of decreased state revenues to our district. I could make better use of those funds actually SERVING identified students rather than literally throwing the money away. **Again, the solution to this issue is simple: Allow a grace period for using tests that are going off the list.** I would recommend June 2019 or December 2019 in order to allow districts to make use of existing supplies and plan for purchase of new ones.

**Next, my previous concerns about the Department's decision to allow iReady to be a pre-screener last fall were more about the process for the decision-making, but that has changed with its approval for actual gifted identification.** I have seen the technical materials for this test. The past committee rejected it twice because it was not validated against other nationally-normed achievement tests. Since gifted identification in reading and math in our state is based on performance on a nationally-normed achievement test, validity should be based on such. Rather, this test has been validated against state proficiency tests, which are criterion-referenced tests to measure basic levels of competency in math and reading, not full spectrum achievement tests with high enough ceilings to determine giftedness. Our own state assessment is not approved for use for gifted identification, nor should it be. Why would it, then, be appropriate to approve a test whose validity evidence is based on test formats not approved for gifted identification? This is the kind of analysis that comes when you have people with expertise - not just familiarity, but expertise - with both testing AND giftedness reviewing the instruments, something that seems to be lacking in this process. **My suggested solution is to revoke approval of iReady for gifted identification and return it to pre-screening status. Direct the**

***publisher to collect data from districts who use it to determine if the percentile scores on this instrument are comparable to those on other nationally-normed tests and resubmit evidence.*** The publisher has been asked to submit validation against nationally-normed instruments twice before and has yet to do it.

***Finally, as with prior situations, communication was poor with the posting of this list.*** My colleagues and I learned about it through word of mouth. There was no email announcement that went out from the Department, nothing to gifted coordinators - a list easily pulled through OED-S, nothing but a quiet posting on the Department's website. I appreciated Superintendent DeMaria's acknowledgement of the issues with past practices regarding communication of changes to the list and his commitment that the Department will do better moving forward. Unfortunately, two days after making this promise, the Department once again issued a change without a solid communication plan. One cannot expect districts to make wise decisions if the Department does not fully communicate changes in policies or procedures. ***My recommendation is the issues above be addressed, the list revamped for gifted identification, and then a broad email bias to superintendents, curriculum directors, and those listed as gifted coordinators in OEDS announce the changes that have been made.***

Thank you for your careful reflection on my concerns. I look forward to further conversation about how we can ensure Ohio's gifted children have ample opportunity to be identified as such (a necessity for them to then receive much-needed services) and that Ohio's districts can be enabled to follow state law in a fiscally-responsible manner.

Sincerely,

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