

**Public Comment Topic Summary
OAC 3301-51-15 draft dated 9/6/2013**

Student Instructional Time:

- Most comments received express concern that the proposed rule will greatly reduce or eliminate quality services.
- Concerns that this will lead to “drive through” or “token attention” to what was perceived as quality services.
- LEA organizations responded they like more flexibility.

Class Size, Caseload:

- Most are concerned with abuse to gifted staff regarding too many students, too many districts or counties, unrealistic expectations for high quality implementation of Written Education Plans (WEP).
- LEA organizations responded they like more flexibility.

Qualified Staff & Professional Development:

- Qualifications:
 - Most comments point out unintended loop holes because coordinator could identify, serve & provide support to general educator providing gifted service without any gifted training.
 - Concern about untrained staff providing gifted services.
- Professional development & support: Proposed revision details general education service option without any qualified gifted support.

Social Emotional: (this is not a section in the rule but many concerns were received from parents and gifted intervention specialists)

- Parent & teacher comments point out that challenging gifted service is the only reason students want to be at school.
- Proposed revisions will lead elimination (or greatly reduced) gifted services.

Whole grade screening: (1/3+ districts are currently implementing whole grade screening)

- Widely supported by gifted organizations & staff
- Several LEA organizations commented that this is an unfunded mandate

Compliance:

- Lack of accountability (removal of caseload, instructional time, qualified staff) will lead to inequitable services.
- LEAs recognize the need for accountability (report card, gifted performance indicator) but want more flexibility to implement.
- Shared comments by parents, gifted staff & LEAs: Lack of definition for what conditions lead to effective services – how can the report card or indicator show us this?
- Several comments expressed concern that the clause was eliminated that would allow ODE to reduce funds for district noncompliance (ORC 3317).

Funding:

- “I’m a taxpayer!”
- “Why is there a lack of accountability for funding?”

Frequency Count for Gifted Rule Public Comment (received during Public Comment Period)

The following count is as accurate as possible based on the determination of respondent roles.

Parents	95
Unknown	36
Gifted Coordinators	35
Gifted Intervention Specialists	26
Other Educators (including retired)	14
Other Roles	9
Superintendents	4
Total	219

Frequency Count for Gifted Rule Public Comment (received after Public Comment Period)

The following count is as accurate as possible based on the determination of respondent roles.

Parents	9
Unknown	2
Gifted Coordinators	5
Gifted Intervention Specialists	4
Other Educators (including retired)	3
Other Roles	4
Superintendents	8
State Representative	1
Total	36

Of the 255 comments received, the following organizations submitted public comment:

- Ohio School Boards Association
- Buckeye Association of School Administrators
- Ohio Association of School Business Officials
- Ohio School Psychologists Association
- Ohio Federation of Teachers
- Ohio Association for Gifted Children
- Gifted Coordinators of Central Ohio
- Mahoning County Educational Service Center Gifted Coordinators