



Public Comment on Gifted Draft Rule: 3301:51:15

Director Dackin:

Thank you for the opportunity to provide public comment on the Gifted Draft Rule number 3301:51:15. My name is Abbie Sigmon, and I am the executive director of the Ohio Association for Gifted Children (OAGC). With nearly 1,000 members, OAGC promotes and supports the development of gifted students in Ohio by advocating on their behalf.

There are 225,000 identified gifted students in Ohio. Comparatively, we have fewer than 940 Gifted Intervention Specialists (GISs) and fewer than 1150 gifted staff - including ESC staff. While I will be discussing specific sections of the Gifted Draft Rule, it is important to note that these ratios of gifted staff to gifted students are deeply unsatisfactory and directly contributes to the daily burnout, struggles, and exhaustion of gifted staff.

Student Talent Development: Gifted Rule Draft 3301:51-15 Section D

Talent development programs identify students with gifted potential and provide them challenging and enriching educational content. All students should have access to enrichment, but not all students must or should be in talent development classrooms. OAGC recommends that this section clearly outline that GISs are teaching gifted students as gifted funding must be spent on gifted education alone. Classroom teachers are not trained to provide talent development for academic giftedness or cognitive giftedness. Talent development must happen with input from GISs; however, talent development classes should not detract from gifted student education, and the rule as proposed could erode services for gifted students across the state.

Cluster Grouping: Gifted Rule Draft 3301:51-15 Section C (4)(e)

Cluster grouping in gifted education is directly responsible for increased gifted academic growth. OAGC recommends the use of cluster groups *where possible*. In small districts with few students identified as gifted, cluster groups are not ideal, nor are they beneficial to the gifted child. Additionally, cluster grouping should also only occur with students of the same gifted identification. Temporary waivers mentioned in this section also need to be defined in greater detail.

Written Education Plan: Gifted Rule Draft 3301:51-15 Section C (5)(e)

Especially when considering the gifted staffing to student ratios, it is unreasonable to require a meeting with parents or guardians of gifted children. This would require one GIS to meet with thousands of parents or guardians during a school year. While OAGC agrees that parents and



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guardians should be notified of gifted services their child may be receiving, these meetings would lessen the amount of gifted education a student would receive.

Professional Development Gifted Rule Draft 3301:51-15 Section F(1)(c)(ii)

OAGC supports the five clock hours of on-going specialized training in gifted education for general education teachers. It is crucial that the providers of this professional development are themselves gifted specialists. We encourage the final draft of this rule to clearly identify credentials for the providers of professional development and recommend that only those certified in gifted specialities are allowed to provide professional development.

As previously mentioned, gifted staff to gifted student ratios are extreme in Ohio. A gifted intervention specialist with thousands of identified gifted students can not feasibly be required to also provide cluster grouping, meet with each and every parent or guardian, and provide talent development to students not identified as gifted. As a solution, *OAGC supports and recommends a gifted service mandate*. Mandating service in Ohio would require districts to hire more gifted personnel and would alleviate the already overworked gifted staff in this state. Barring that monumental change, OAGC must underscore that best practice for gifted children is currently not possible for all gifted students in Ohio. Without appropriate numbers of credentialed GISs and Gifted Coordinators, there simply isn't the infrastructure to effectively support the needs of all gifted students.

Thank you for the opportunity to provide public comment today. I am happy to answer any questions at this time.