



This document represents the Ohio Association for Gifted Children's response to the Gifted Rule: 3301:51-15 posted on April 19, 2024.

OAGC supports the language found in Section C(4)(d) and (e) regarding cluster grouping. Cluster grouping should happen where possible and with students of similar gifted identification.

OAGC also supports the changes in Section C(5)(a)(iii). The previous rule draft language would have required in-person meetings with each parent or guardian of a gifted child. This change reaffirms the necessary relationship between parent or guardian and the gifted intervention specialist while also allowing input in a more reasonable practice.

Additionally, OAGC supports the language found in Section F(1)(b)(3) regarding the providers of gifted professional development. Gifted professional development should be provided by an educator certified with gifted specialties.

OAGC is still deeply concerned that Section D Student Talent Development does not outline constraints on who should provide talent development. OAGC recommended that this section clearly outline that GISs are teaching gifted students as gifted funding must be spent on gifted education alone. Talent development must happen with input from gifted staff; however, talent development classes should not detract from gifted student education, and the rule as proposed would erode services for gifted students across the state. If GISs and gifted coordinators are to be allowed as talent development providers, OAGC recommended that there be a cap of no more than 15% of a GIS's time leading talent development programs. There are 225,000 identified gifted students in Ohio with fewer than 940 GISs and fewer than 1,150 gifted staff (including ESC staff). A failure in capping the amount of time will dilute already scarce resources to a vastly under-served population of students and will open up gifted state funding to be mis-used in the general classroom.

OAGC recommended five clock hours of ongoing specialized training in education for general education teachers. After initial training, five hours of gifted professional development each year are recommended. Section F(1)(b)(iv) states that general education teachers will participate in ongoing specialized training in gifted education each year thereafter but does not clearly state how many hours are required. The Gifted Advisory Council had come to this agreement and it is surprising that this requirement has been removed from the rule.

OAGC is also concerned at the removal of No Service Letters from Section E of the draft rule. No service letters allow districts to provide ongoing updates on gifted services to parents and guardians of gifted children.

Finally, OAGC is concerned with the removal of a corrective plan following an audit which was located in the original draft of this rule. Parents or other individuals should be allowed to file a



gifted education complaint and request that ODEW investigate alleged violations of either Chapter 3324 of the ORC or the Gifted Rule. After an investigation, districts will be provided an opportunity to respond to allegations. The department could then proceed with corrective action after a gifted education complaint investigation was completed. The removal of this language as well as the no service letters eliminates support for families trying to advocate for gifted children - an already difficult process.

While navigating this new rule process, OAGC is encouraged at the relationship between our organization and the newly formed Ohio Department of Education and Workforce. We hope to continue providing feedback on how this rule, approved gifted assessments, the Gifted Advisory Council and other gifted regulations affect gifted children in the state of Ohio.