



These bullet points represent the Ohio Association for Gifted Children's response to the Gifted Draft Rule: 3301:51-15 posted on January 12, 2024. These are the most pressing issues OAGC has identified, but do not represent the totality of our concerns.

### **Student Talent Development**

#### **Gifted Rule Draft 3301:51-15 Section D**

- OAGC recommends 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 GIS; 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.
- If GIS are to be allowed as talent development, OAGC recommends that there be a cap of no more than 15% of a GIS's time leading talent development programs

### **Cluster Grouping**

#### **Gifted Rule Draft 3301:51-15 Section C (4)(e)**

- 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.
- Cluster groups should only occur with students of the same gifted identification.
- Temporary waivers mentioned in this section also need to be defined in greater detail. How often are they available? How often will they be approved? How quickly will districts be notified they have been approved for waivers?

### **Written Education Plan**

#### **Gifted Rule Draft 3301:51-15 Section C (5)(a)(iii)**

As written, this section would require a GIS to meet with the parent or guardian of each identified gifted student and obtain their signature on the WEP. While OAGC supports parent and guardian involvement in a child's education, this requirement is extraneous. For a GIS with 100 gifted students in their caseload, this would equate to over two weeks of nonstop parent or guardian meetings.

- OAGC requests that ODEW outline specifically what a "reasonable attempt" at communication would be.
- Additionally, we suggest rewording this section to state, "The District will make a reasonable attempt within one grading period after the student is placed into service, and each year thereafter in which a student receives gifted services, *contact the parent or guardian via email, phonecall, online conference, or in-person conference.*"



## **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 specialties are allowed to provide professional development.

## **Gifted advisory council**

### **Gifted Rule Draft 3301:51-15 Section E**

- Membership to the Gifted Advisory Council must be more explicitly stated. Membership should include the executive director and one executive board member of OAGC.
- We also encourage membership of the Gifted Advisory Council to include one member from each state coordinator affiliate groups. This representation would provide unique perspectives from gifted coordinators around the state of Ohio.