While there are many problems with the new draft operating standards for gifted students, the following issues are of major concern:

- **Any quality criteria for service** including time requirements and the need for qualified gifted intervention specialists to provide service or support in regular classroom settings. This will allow districts to indicate that even as little as one day of service per year can count as served. In addition, no set preparation or support to general educators providing services is required.

- **All caseload restrictions and direct contact time with gifted students** for gifted intervention specialists. Gifted intervention specialists may be required to meet with an unlimited number of students for as little time as possible so that districts can indicate more students are being served.

- **Any gifted coordinator requirements that relate to the knowledge of gifted education.** For all intents and purposes, anyone (with or without an education license much less a gifted license) may now be the gifted coordinator. As written, the school secretary can also now serve as the gifted coordinator, which we believe is contrary to Ohio Revised Code.

- **All reporting of qualified personnel, professional development**, and assistance to regular classroom teachers thus removing any meaningful data collection to analyze the effective use of resources.

- **All funding accountability requirements.** The General Assembly allocated a record amount of gifted funding that was meant to be spent by districts to serve gifted students. Taxpayers are paying for these services, but there is little guarantee that any those funds will be spent to support gifted children. We believe this change conflicts with the intent of Ohio Revised Code, and finally,

- **The provision that allows ODE to reduce funds for non-compliant districts**, which is required under Ohio Revised Code. Without this provision in operating standards, ODE audits are useless.

OAGC supports the inclusion of two whole grade testing opportunities and the provision of professional development to gifted intervention specialists and gifted coordinators included in the new draft.