Date: January 23, 2015  
To: Richard A. Ross, State Superintendent of Public Instruction  
CC: Members, State Board of Education  
From: OAGC Governing Board  
Re: OAGC Response to the ODE Testing Report

The governing board of the OAGC (Ohio Association for Gifted Children) respects the effort that went into the recently released report on testing in Ohio. The report, however, raises both questions and concerns as it relates to gifted identification of students in Ohio. With regard to the development of the report, OAGC is surprised to see recommendations pertaining to gifted identification when no one from our association, the gifted field, or the Gifted Testing Advisory Committee was consulted prior to the release of the report. Our association has access to a number of experts on gifted assessment who would have been more than willing to provide input and feedback on the proper use of assessments for the identification of gifted students.

Whereas there may be an excessive amount of state level assessments and benchmark testing, it is in stark contrast to the dire situation and lack of assessment for identification of potential gifted students across the state of Ohio. The data regarding gifted identification tells a bleak story about the lack of systemic screening and assessment for this population, particularly students in grades K-3, minority and/or economically disadvantaged students, and students in the area of visual and performing arts. Sadly, 10% of Ohio’s districts do not identify any gifted children in grades K-3. Almost one-third of districts identify fewer than 3%. The statistics are even more extreme if we examine gifted assessment data in grades K-2. In addition, economically disadvantaged students are half as likely to be identified as gifted as their non-economically disadvantaged peers. If anything, more whole grade screenings should be implemented for the identification of gifted students in Ohio. Given this state of affairs, we are concerned that any steps to reduce testing in Ohio will negatively affect the poorly-enforced identification of gifted students. More specifically, we are concerned about Recommendation 1 and Action Step 7 of the report:

**Recommendation 1 – Limit the amount of time a student takes tests at the state and district levels to 2 percent of the school year.**

Without commenting on the main goal of reducing the amount of state assessments, OAGC is troubled about the potential impact of this recommendation on the proper screening, assessment, and identification of all special student populations, including students with cognitive, behavioral, and learning disabilities, students who are gifted, and English Language Learners. While many students who are gifted can be adequately identified with a group assessment, this is not true in all cases, particularly in the area of visual and performing arts and for those students with multiple exceptionalities.

The backlash against excessive testing from both educator and parent perspective is mostly aimed toward high-stakes state performance assessments, interim benchmark testing, and the use of these assessments for teacher evaluations. Assessments geared toward understanding individual student learning needs were in place decades before state wide assessments began. The use of assessments for the identification of special populations should not be compromised due to excessive testing for other purposes. The report calls for the testing limits to exclude “the time students spend taking teacher
tests, required tests for only special populations or samples of the general populations.” OAGC strongly recommends that any policy that limits testing exclude those assessments used to determine individual student learning needs. We are opposed to any policy or legislation that will undermine the appropriate assessment of special student populations.

**Action Step 7: Determine whether there is a way to use the new state tests to identify gifted students in certain tested areas.**

ODE will study how this can be done and release the study finding by January 31, 2016. OAGC has several concerns and questions about this action step:

1. **The new state assessments are not designed to identify gifted students** nor is there any validating data supporting their use for such a purpose. Both Ohio Administrative Code as well as Code of Fair Testing Practices in Education prohibit the use of tests for purposes for which they are not designed. OAGC is concerned that the inappropriate use of criterion-based reference tests will ultimately identify too many students in wealthier districts while virtually eliminating the identification of minority and economically disadvantaged students in all districts. The use of unproven assessments is a questionable practice, at best. At worst, it may eviscerate the opportunity for students most in need of services. Additionally, both the ceiling and cut scores set for the new assessments are concerning. While we know that the current state assessments have inadequate ceilings for the purposes of identifying gifted students, and the new assessments are purported to have higher ceilings, we do not have any indication that they are adequate for the purpose of identifying gifted students. We do know that, unlike the Smarter Balance assessments, the PARCC examinations do not adapt to the level of the student, which is unfortunate.

2. **There is insufficient experience with the new state assessments to be able to reach any conclusion by January 31, 2016.** The first administration of the new state assessments is scheduled for the spring of 2015. The final results of these assessments may not even be available until 2016. To accurately evaluate the appropriateness of any state assessment for the use of identifying gifted students, several years of longitudinal data should be collected and evaluated to establish the stability of the test overall and the ability or inability of the tool to accurately and fairly discriminate achievement levels of special populations and subgroups. To require a report before potentially any data can be evaluated is poor public policy and not in the best interest of gifted children in Ohio. OAGC believes that any study on the use of the new state assessments include multiple years of data. Also, any study needs the direct involvement with individuals with gifted assessment expertise, including, but not limited to the Gifted Testing Advisory Committee. The new state tests should go through the same evaluation of the quality of its development, test structure, and national norming process as any other tool currently approved for gifted identification. While gifted testing is not considered high stakes from an accountability perspective, it is a high stakes test in the sense that, in practice, children are going to be placed in gifted services (or not) based on these scores. The data should be conclusive about whether the new assessments are adequate for this purpose. It is not in the best interest of children to prematurely approve an assessment merely to solve an issue that has little to do with the identification of gifted students.

3. **The use of the new state assessments could provide an incentive to districts to delay the identification of gifted students until the end of 3rd grade.**

Data already indicate that districts are doing an inadequate job of identifying gifted students in grades K – 2. If districts begin to rely on state assessments for gifted identification of students in the areas of math and reading, and the first opportunity to offer an assessment is the end of 3rd grade,
4th grade would then be the earliest opportunity for any kind of gifted service for these students. Research shows students who are gifted but not served demonstrate declining levels of achievement as time passes. Further, the later identification and services begin, the less likely economically disadvantaged and minority students will be identified or served. If it is determined that the new assessments are appropriate to identify gifted students in math and reading, it becomes even more important to require whole grade testing in the areas math and reading and superior cognitive ability in the K-2 grade levels. In fact, due to the low level of gifted identification in the early grades, the draft revised gifted operating standards recommend whole grade screenings at certain grade levels.

4. **How will the Study be Conducted?**

Very few details were shared in the report about how the study would be conducted. OAGC has a number of questions about the study including:

- Who will be conducting the study?
- Will the test publishers be involved in the study?
- How will the cut-off scores be developed?
- How will the assessments be validated?
- How will the Gifted Testing Advisory Committee be utilized in this process?

**Concluding Observations and Comments**

While OAGC appreciates the pressure that ODE now faces due to the numerous state assessments, we would ask that you not “solve” the problem by creating one for the appropriate identification of gifted students. The backlash against excessive high-stakes testing in the state of Ohio has little or nothing to do with the assessment of gifted students. The laws to identify these students using nationally-normed assessments have been in place for over thirty years. The majority of testing in districts relates to state accountability measures, student growth, and teacher evaluation -- not gifted identification. The fact is that nationally-normed assessments are useful for a variety of purposes in a district beyond the identification of gifted students. OAGC encourages districts to make better use of the assessments they are administering. To that end, we have regularly posted a crosswalk about assessments that can be used for multiple purposes.

It is critically important to use the correct assessments to identify gifted students. Districts have had the maximum flexibility to use appropriate tools to identify gifted students for the past three decades based on recommendations provided by ODE, which go through a rigorous approval process. To hastily decide that the new state assessments should be used as a tool to identify gifted students is a solution to a political and public-relations problem. But it may do little to actually help gifted students in this state, many of whom are woefully under-identified and under-served.

We look forward to continued conversation on this important issue. If you have any questions, please feel free to contact Ann Sheldon at anngift@aol.com or 614-325-1185.