COMMONLY ASKED QUESTIONS PERTAINING TO GIFTED PROGRAM ELEMENTS AND THE CGER PROCESS

The Exceptional Children's Educational Act (ECEA) is Colorado's primary law with requirements for the implementation of specific program **elements** and procedures for gifted education programs. There are thirteen primary elements within ECEA Rules that provide the foundation of an administrative unit's gifted program plan. The Colorado Gifted Education Review (CGER) process respects the AU with the opportunity to reflect on the program plan and self-assess levels of implementation for each of the program elements within the AU's Self-Evaluation protocol. The CDE Office of Gifted Education assembles a team of four experts in gifted education to complete a *Desk Audit* of the AU's self-evaluation and conduct a *Site Visit*.

Trust and shared responsibility are essential values of the CGER process. Each is conducted from the premise of learning together about the strengths of a gifted program with the expectation of ongoing continuous improvement and support. Recommendations for enhancing the program and steps for corrective action are based upon the results of collaborative discussion, data, and outcomes of the desk audit, interviews, and stakeholder feedback. It is recognized that development of a gifted program in some AUs may take time and proactive solutions. Thus, CGER will help the AU leaders determine priority improvement areas annually until the AU completes implementation of each element.

The CGER process recognizes that individual administrative units will implement the elements in ways that blend with local priorities and resources. The CGER expects to see varied means of implementation across the state.

Upon completion of the CGER process, the CGER team writes a report that includes a summary of programming strengths, recommendations for continuous program improvement, and a listing of elements with needs for corrective action, if applicable. Compliance or non-compliance is based on ECEA and the State Board of Education rules for the implementation of ECEA. The report is submitted to the district's superintendent or a BOCES' (Board of Cooperative Education Services) Executive Director, and the AU's gifted education leadership. The *CGER Handbook* on the CDE Gifted Education Website is available for comprehensive preparation of a CGER visit:
https://www.cde.state.co.us/gt/cger .

This document includes commonly asked questions pertaining to ECEA gifted program elements and key provisions for meeting conditions of law.

General Questions

What are the requirements for program evaluation and the CGER process?
Program evaluation and accountability are provisions of the Exceptional Children's Education Act. "Periodic feedback" from stakeholders is one of the defined methods in regulations for self-evaluation and review of the gifted program. For periodic feedback the administrative unit (AU) determines a schedule and means for collecting program information. The AU also informs parents, educators, and other required persons about their method(s) for periodic feedback. [12.02(2)(i)(iv-v)]

How administrative units collect feedback may vary. For the 2017-2018 school year, AUs who have a CGER will be encouraged to conduct a survey, solicit input through focus group interviews, or other means defined by the AU prior to the site visit. If the AU cannot obtain this information prior to the CGER, the Review Team will assist by conducting a Level II CGER visit that includes focus group interviews. This collected information will provide the AU with initial stakeholder feedback for integration into continuous improvement steps. Technical assistance is available to AUs on how to conduct periodic feedback as a part of program evaluation. In the CGER Report, the AU will be asked to provide information about a method(s) it will use in the next 4 year cycle to collect periodic feedback.

Moving forward into next year, 2018-2019, the CGER teams will expect evidence of periodic feedback in the self-evaluation, prior to the CGER visit. AUs will determine a method for collecting periodic feedback and summarize key results (e.g., top 3 priorities for continuous improvement) in the Data Management System-AU Self-Evaluation form.

It is recommended that periodic feedback include but not necessarily be limited to stakeholder comments and perceptions about: strengths of the program, communication and family engagement, priorities and concerns of the child's family, identification procedures, advanced learning plans, instruction and programming, personnel, and impact of gifted programming on student achievement and progress.

Does our AU have to conduct a survey as part of our program evaluation?
A survey of stakeholders is evidence of self-evaluation that provides "periodic feedback" about the gifted program.
If the AU decides not to administer a type of survey or questionnaire as part of its program evaluation, focus groups may be conducted to solicit stakeholder input. Guidelines for conducting focus groups can be found in the ***CGER Handbook***.
If no survey or focus groups have been conducted in the AU, then the CGER team must conduct focus groups to collect data on implementation of program elements and the Evaluation and Accountability element will be marked in non-compliance.

What should be the focus of "periodic feedback"?
Periodic feedback, unlike student progress monitoring, is in regard to program evaluation of the ECEA program elements. Evaluation means seeking input from administrators, teachers, parents and students on procedures, methods, and/or tools used to implement program elements. Evaluation includes*: Identifying the priorities and concerns of the child's family and resources to which the family and the child's school have access; determining program strengths and areas for program improvement*; *identifying strengths, interests, and needs; and monitoring the child's academic achievement and growth and affective goals.* 12.01(5

What are the expectations for reporting input collected through stakeholder surveys?
CGER looks for a balance (not match) of responses from all stakeholders, similar to when interviewing or conducting focus groups in the AU. A response rate of 40% is the target; however, lower percentages may be considered valid if data provides a representative sampling of the stakeholder group.

CDE provides guidance on developing appropriate survey questions. When reporting the collected data, analyze data of percent yes/no or by percent on rating scale scores for common data questions, like:
- What are the top 3-5 programming strengths?
- What are the top 3-5 issues or concerns?
- What is a common theme(s) about the monitoring of academic achievement, growth and affective goals?
- What are common themes in responses?
- What are your priorities for improvement based upon survey responses?
- How will parents, educators, and other required persons be informed about the results and next steps?

What if our survey data indicates an area of concern or an element of non-compliance?
If the AU has not had adequate time to act on the self-evaluation data to implement corrections, the AU should describe the data collected through the survey distribution in the AU Self-evaluation. The CGER report will recognize the AU's collection of stakeholder feedback and provide recommendations for corrective action steps for any element of non-compliance.

During the Desk Audit, the CGER team indicated specific key requirements of an element did not meet conditions of Rule. Our AU corrected the requirements prior to the CGER site visit. Will these elements be marked as "non-compliance" on our CGER Report?
No, the AU is in compliance. The AU has demonstrated efforts in continuous improvement. This immediate modification is recognized as meeting conditions of Rule. The AU's Comprehensive Program Plan (CPP) should be modified to reflect these programming enhancements.

Does our AU have to rewrite our CPP (Comprehensive Program Plan) to prepare for our CGER?
No. The CGER process provides the AU an opportunity to examine their CPP and determine if any new information should be included since the document was last published on the CDE Office of Gifted Education website. If necessary, the AU Gifted Coordinator/Director reopens the CPP in the Data Management System and revises or edits the CPP prior to the CGER Team's Desk Audit. The narrative descriptions given in the CPP provide the basis for the CGER process. During the desk audit, the CGER team thoroughly reviews the CPP to gain an understanding of implementation procedures and practices for each of the ECEA key requirements.

What does it mean to provide "evidence" of implementation of key requirements?
The AU is responsible for providing tangible evidence of **implementing the indicators** in all program elements. A list of possible examples of evidence is located in the *CGER Handbook*. It is highly recommended that the director/coordinator reviews the indicators of each element before the formal CGER period begins so that the AU may be able to articulate evidence as they desire for the goal of 100% compliance.

The member districts of our BOCES vary in the gifted programming provided to gifted students. Will the BOCES be found in non-compliance of an element if some of the districts do not meet conditions of Rule?
Yes. BOCES oversee the implementation of the comprehensive and annual program plans. The BOCES is responsible to assure implementation in member districts. The CGER report would not identify the districts by name, but would rather articulate the fact that two out of five-member districts do not meet conditions of law. The report would articulate the strengths found in the overall AU. Technical assistance would seek innovative means to solve the BOCES situation. The BOCES, local community and CDE holds shared responsibility. Letters of non-compliance and holding of funds are two measures of action after *reasonable* time was provided to complete corrective action.

If an AU has a charter school that has not implemented the AU's program plan, will the AU be consider non-compliant?
Yes, for the specific elements of the program plan the school has not implemented. The AU develops processes and procedures for each of the ECEA programming elements. The AU ensures equal and equitable access for all students enrolled in the AU. The AU is responsible for all schools implementing the gifted program plan.

Procedures for Parents, Family, and Student Engagement & Communication

What is considered an appropriate or satisfactory level of communication?
The AU director/coordinator describes ways of communicating to parents, families, and students that take into account ease of access, current information, primary language of the AU, and varied ways to be involved.

The team can triangulate this information with stakeholder responses about communication to identify strengths or next steps in reaching the desired state of quality communications. Communication is not out of compliance if methods are varied and address indicators.

Is it required for our AU to have a gifted website and/or a gifted handbook?
No, this is not a requirement.   Although not required by Rule, many AUs find having a comprehensive handbook and website strongly supports their program plan and ensures timely and efficient communication with all stakeholders. Access to information is an essential condition of "procedures for parents, family, and student engagement and communication" (12.02(2)(a).

Our district sends out progress reports for every student mid-way through the grading term. Does this satisfy the requirement for "progress reporting" for gifted students?
It depends upon if the mid-way report includes information about ALP goals. The progress report in terms of gifted students includes information on the student's progress towards his/her ALP goal(s). The timing of these reports can align with the regular schedule of progress reporting to parents for efficiency and integration of the practice with a common schedule in schools; the AU may have another means to provide progress reports about ALP progress.

Our high school provides concurrent enrollment for all students. Must we provide a separate form of communication to our gifted parents about this opportunity?
No, unless parents or students indicate a concern about barriers to gifted students' access or have no knowledge of this programming option. It would be "customer" friendly to include information about concurrent enrollment in school or district newsletter or a general letter to parents of gifted students. For more information about Rules pertaining to concurrent enrollment, visit: https://www.cde.state.co.us/postsecondary/concurrentenrollment

How do we support gifted students with college and career planning?
In Colorado, every high school student is required to have an Individual Career and Academic Plan (ICAP) as a college and career planning tool. The ALP can also address college and career planning within the affective domain. For more information about ICAP, visit: https://www.cde.state.co.us/postsecondary

What does it mean for parents and families to "participate in the community?"
CDE provides guidance on evidence-based practices outlined in the Standards for Parent, Family, School, and Community Involvement. The materials of Joyce Epstein are helpful resources. Examples might include parent nights, home visits, book studies, principal coffees, advisory boards or support groups. https://www.cde.state.co.us/fedprograms/ti/parents

Is it required to have a parent advocacy group?
It is not required, but is highly encouraged in the ECEA that AUs "*establish and maintain a local advisory committee that includes persons who are involved in or concerned with gifted education and concerned with improving the delivery of and communication concerning gifted education.*"

Is it required to provide parenting events?
The AU is required to describe *ways (plural) the AU educates families and parents about giftedness or parenting gifted students*. This may occur in different formats such as informational events, newsletters, or book studies. AUs also are required to provide parents with information about involvement in advanced learning plans, accountability and progress reporting, student performance, access to identification procedures, concurrent enrollment, parent involvement in college and career planning, program elements, programming options and how parents may participate in the school community. Example, these topics could be covered in Back To School Nights, brochures, or family nights.

In a BOCES, is each member district required to have a website link to the BOCES gifted website?
ECEA does not require an AU to have a website. Within a BOCES, the law says <u>each</u> district must have a plan for gifted parent, family, and student communication and engagement. Websites are a common means to communicate with stakeholders about procedures and information about the gifted program and engagement. The Web is one step in transparent communication. However, there are other means to show delivery of information at the school/classroom level. If websites are not used, then the AU and district provides other evidence of communication and engagement.

Definition

What is meant by an AU having a definition that is "substantially similar" to the state definition of a gifted student?
This means the AU's definition is *for the most part* the same. The *essential* concepts of the state definition are requirements to guide the program and programming:
1) Age range for abilities, talents, potential
2) All categories of giftedness
3) Special provisions for programming
4) Unique populations
5) Attributes in any one or more categories

AUs may enhance the definition by referencing unique attributes of the local population; and using attributes from nationally recognized definitions that also fit local needs.

What does the Rule specifically mean that an AU's definition "shall serve as the basis for the implementation of all other program plan elements?"
The AU's definition will influence/drive how people look for and serve aptitudes and potential (i.e., pre-identification experiences, observation and assessment tools). Identification assessment is available for all categories of giftedness in every student population. Programming is evidenced to match the student's strengths in one or more area of giftedness. Accountability includes advanced learning plan goals in aptitude areas and progress monitoring. The definition section, itself, does not delve into the details of how it is the basis for implementation of all other program elements.   The CGER team looks for evidence mainly in identification, programming, and accountability that shows the different areas of giftedness are being addressed and monitored. ALPs will address varied categories of giftedness dependent upon the student's strengths. Parent communication will include information about programming options available to match varied student strengths and challenges.

Identification

My parents receive a formal letter that their child has been formally identified. Does this meet the condition of parents being made "aware of the assessment process?"
No. This Rule relates to C.C.R. 12.02(2)(a)(i) that <u>requires</u> parent, family, and student engagement and communication: *how parents are informed about access to identification procedures…information about involvement and progress monitoring.* The regulation refers to parental information <u>during</u> and <u>after</u> identification assessment. Note: This notification letter may happen after screening or collection of initial observation and assessment data for recognizing potential. Receiving a letter after the student is identified does not include parent involvement *during* the identification process.

What is meant by "equal and equitable access?"
The Rule means that there are basic, similar identification procedures for every student group. There are unique or additional (over time) procedures that may be needed to recognize and nurture exceptionality expressed in the local student enrollment. If the AU is following the state guidelines for identification they are in compliance in this area.

How does our AU know if our population of identified students complies with the Rule for "equal and equitable access?"
The rule of thumb is your gifted student enrollment should mirror the local student enrollment. CDE provides annual gifted demographic data for each AU in the Data Management System. For proportionality "fitness," use the risk factor statistics generated for each AU.

Our AU has disproportionality in one of its subgroups; however, the AU has an action plan to address this area of inequity. Will this be an area of non-compliance?
No. If the AU has an established action plan that addresses disproportionality the element of identification is considered compliant. The CGER report will recognize this intention to improve. Examples include but are not limited to:
- Universal screening
- Out-reach practices that make sense for the cultural, linguistic, and resource- challenged populations of their AU
- Information in multiple languages
- Additional data points in the body of evidence
- A talent pool
- Procedures/tools searching for creativity, leadership, and talent aptitudes

Our AU does not have a procedure for identification in all the areas of giftedness. Does this mean we don't meet condition of Rule?
Yes. An AU may not have students identified in all areas, but the AU must have a procedure in place to discover students with exceptional potential for each of the areas of giftedness defined in Rule.

What constitutes a "referral" for gifted assessment?
AUs shall develop procedures that seek referrals from a variety of sources used for identification assessment. Referral data from varied people and data sources include, but are not limited to: universal screening results, checklists, performance assessment, anecdotal records, interviews, questionnaires, test data, and response to intervention records.

We require our parents to sign a 'permission to assess' form. Does this constitute a "referral?"
No, the permission form is not a referral. As stated above referrals are requests to consider a student. Someone or data suggests that a student may have exceptional potential. A referral drives the collection of additional information about the child's strengths and interests.
Parents may refer their child; and typically they would be asked to provide information about their child's observed characteristics that might lead to additional assessment. This may be in the form of a questionnaire and/or checklist.

Is it required to have our parent referral on our website?
No. It is required that every parent knows *how* to access identification procedures and how to submit a referral if desired. For customer service, some AU's post all identification information on their website.

What evidence can demonstrate compliance in terms of identification timelines stipulated in Rule?
Evidence may include, but is not limited to:
- Dates on forms
- Dated letters to parents and students

- Annual and routine practices described in handbooks or procedure manuals
- Information posted on website

The AU director/coordinator will be able to describe how timelines are met in their district(s).

Our AU only uses cognitive and state assessment data for identification. Is this out of compliance?
Rules state an AU shall have body of evidence to include qualitative and quantitative data. 12.02(2)(c)(v). There is potential for bias and lack of equity if identification assessment tools are limited. The AU has options when using the four pathways to identification. Performance assessment, checklists, observation tools, and district normed referenced achievement tests are other tools. Using cognitive tests and state assessment data exclusively for all student groups is out of compliance.

Do we have to identify a "talent pool?"
Talent pools are not a specific requirement. The ECEA Rule addresses criteria for determination of giftedness or a talent pool.   Analyze the gifted student population demographics. If disparities exist, then a talent pool is evidence that an AU is seeking aptitude and potential in every student group.

What is meant by a "review team with one member trained in gifted identification?"
Identification is determined by a *team* of educators, not just one person examining data results in isolation. Team member names and titles are recorded in a student's body of evidence. A person "trained" in gifted education does not need to be endorsed in gifted education, but should be familiar with CDE protocol and guidance pertaining to characteristics of giftedness, assessment, and portability in gifted identification. Technical assistance for identification can be located on the gifted education website. https://www.cde.state.co.us/gt/identification

Can a student's body of evidence be described in an Advanced Learning Plan (ALP) or must an AU have a separate identification document placed in a student's cumulative record?
An ALP has two sections: the student profile (body of evidence) and the Working Section (goals and progress reporting. Ask the director/coordinator to describe how these two sections are maintained and retained in their AU. Many current electronic ALP systems have formats to retain both sections. Some AUs choose to have a separate document used during identification assessment process. The ALP is part of the student's educational record. The ALP review process requires the submission of the two parts of the ALP via the ALP Interchange System in the Data Management System. A tutorial for the ALP Interchange is on the CDE website: http://www.cde.state.co.us/gt/alp-0

Advanced Learning Plan (ALP)

Part of the Self-evaluation includes our AU reviewing a designated set of ALPs. Will the ALPs also be reviewed by the CGER team?
Yes. The purpose of self-evaluation is to learn about the AU practices: to verify process, procedures, and involvement of staff in the AU when completing standards-based ALPs with parents, students, and other personnel. The CGER team confirms the ratings on a subset of the ALPs reviewed.   If the CGER team does not agree with the ratings of the AU, an opportunity for technical assistance is justified. Corrective action will need to be immediate as detailed in the CGER report. For more information about ALPs, visit: https://www.cde.state.co.us/gt/alp-0

As we reviewed our designated ALPs, we found components missing in some of them. Do we correct these ALPs and re-upload them prior to our CGER?
You may, however, it is not expected for the AU to modify or revise the selected ALPs prior to the CGER visit. During the ALP review process, the AU may find the uploaded ALPs are missing components of Rule. This is an opportunity for the

AU to determine areas for future growth and improvement in terms of ALP development. The ALPs would need to be revised in terms of the timeline set in the CGER report. Student ALPs have an urgency to fix as soon as issues are discovered. If ALPs are corrected by the end of desk audit this is area of non-compliance.

Programming

Our AU has limited funds and personnel to provide gifted programming. Is it acceptable for programming options to be provided via enrichment opportunities after-school or on Saturdays?
Programming increases knowledge, skill, and application in the area(s) of giftedness. Programming is "special provisions" identified in Rule. C.R.S.22-20-206 - *An administrative unit shall ensure that its gifted education program provides programs and services for gifted children for at least the number of days calendared for the school year by each school district in which the AU provides the gifted education program*.
This means that the gifted program is contiguous with the school year, minimally. Summer school, Saturday programs, enrichment, and field experiences may occur out of school.

Can all our identified gifted students participate in the same enrichment opportunity?
Gifted programming is differentiated according to the student's ALP. The same programming option for all gifted students on a regular basis is not likely appropriate given the diversity of the gifted population. Programming is sometimes a shared responsibility designed between school and community resources. While all gifted students might attend a camp, or participate in a fieldtrip, daily differentiated instruction, selected coursework, or projects support interests and ALP goals.

Is the classroom teacher responsible for differentiating for the gifted student to meet his/her academic needs?
Yes, the classroom teacher or teacher of a specific aptitude provides differentiation. As per Rule, gifted students shall receive daily, rigorous instruction to support their strength area(s). Differentiation is a required educator effectiveness standard for every student with special needs, including gifted students.

What if the teacher has no support in learning about differentiation strategies?
Based on stakeholder response, the AU may find this is an area for future growth. Support for professional learning opportunities in gifted education can be found on the Gifted Education website and through the regional network system. https://www.cde.state.co.us/gt/professionaldevelopment

How can we show evidence of "effective" programming?
Analysis of gifted performance data may be one way to determine if programming is rigorous with expected outcomes. State data is only about tested content areas. District assessment data may be another source. Advanced learning planning goals being achieved can also be evidence of effective programming. [Ask the director/coordinator how he/she considers their programming to be effective?]

What is meant by programming being "articulated" across all grade levels?
When a student moves from one grade to the next, the AU has a process to transition the student to the next level. This is especially important when a student moves from elementary school to middle school and middle school to high school. Examples of articulation may include, but not be limited to, the transition process described on the AU's website, in a handbook, posted in the school calendar, or outlined in a student's ALP.

At the high school level, we offer AP and concurrent enrollment as our gifted programming. Is this sufficient?
AP classes, especially taken at an earlier age than age-peers are a programming option. The term *sufficient* is relative to the needs of the student. Is the rigor of the AP class challenging the student to learn and grow? How are affective

needs supported? It is recommended that capstone projects, seminars, service and internship experiences, or other peer-like opportunities be paired with AP coursework as programming options available to high school students. AUs are not out of compliance if only AP and IB are named for gifted programming. This situation is an opportunity to describe additional programming options at the secondary level.

How do we show evidence of "affective support?"
Evidence may include but not be limited to: availability of counselors to gifted students, seminar or access school periods for gifted students; opportunities for leadership development; cultural sensitivity school/course activities; journal writing and adult check-ins; career interest surveys and follow-up with data; scheduled career counseling sessions; debate clubs or other communication development opportunities.

What type of "problem solving" process is required for students who are underachieving? Can we remove them from the gifted program is they no longer demonstrate advanced ability?
Generally speaking, students are no de-gifted. In Colorado, once a student is identified gifted, he/she retains that identification throughout their school career; unless there is clear evidence that identification assessment was faulty. When a student is underachieving, the AU shall implement a process to provide appropriate interventions for the student. Programming strategies include stating how the ALP team, child study team, or review team shall problem solve in collaboration with the family, the student, and appropriate staff. The Response to Intervention process provides a problem-solving protocol to assist in providing appropriate support structures and instruction for the student.

Evaluation and Accountability

See "General Questions" on page 1 for additional information on this element.

Is our Gifted UIP Addendum examined during the CGER?
Yes. The UIP Addendum is the annual plan to be integrated into the district's UIP plan. The annual plan shows an identified area for student performance improvement and action plan. The UIP Addendum shows evidence of accountability for gifted student performance. If components in the UIP are missing, this element is rated as non-compliant.

What type of evidence shows our AU is monitoring our gifted demographics and student performance?
Evidence includes, but is not limited to one or more of the following practices concerning gifted demographics and student performance:
- Analysis of trend data over time
- Reporting data to stakeholders
- Data analysis sessions, school/student data dialogues, workshops in gifted performance data analysis
- UIP addendum action plan that addresses performance challenge
- CPP targets for continued improvement

How might we demonstrate the manner in which affective needs are monitored?
ALP progress reports should include information about academic and affective goal development. The AU may collect data on the percent of students who attained affective goals and/or provide examples about how affective areas are monitored and measured in the AU's program plan and stakeholder resources (i.e., websites, brochures, handbooks, etc.).

Personnel

Is an AU required to have a person who is endorsed in gifted education to administer the gifted program?
According to Rule, *The AU shall make good faith effort to hire and retain at least a half-time qualified person to administer and monitor the implementation of the AU's gifted program*. The AU must *employ or contract with a person who is responsible for: management of the program plan; and professional development activities that improve and enhance the skills, knowledge and expertise of teachers and other personnel who provide instruction and other supportive services to gifted students; and increase, to the extent practicable, the number of qualified personnel providing instruction to gifted students.* If the AU receives funds from the Qualified Personnel grant to coordinate the gifted program, the person <u>must</u> be endorsed, or working towards an endorsement, in gifted education.

How long can an educator work on earning a gifted endorsement?
A typical time frame to earn a core endorsement is 2-3 years depending upon the number of courses taken in one year and work experience credit. A Master's of Arts or Specialist Endorsement may take up to 5 years.

Is our AU required to show evidence of annual professional development to support gifted education?
Yes. Opportunities in or outside the district should be provided annually to educators.

Is our AU required to "collaborate" with universities or colleges?
No. The Rule is: *AUs <u>should </u>collaborate with universities and colleges for the development of qualified personnel.* The AU is not out of compliance if no collaboration occurs. The CGER report may indicate ways to do this. For example, "Form a cohort group to earn endorsement; develop a partnership with a local college/university for student summer experiences and/or teacher courses."

What is meant by teachers meeting federal requirements for "highly qualified?"
With the new ESSA regulations, highly qualified is no longer a provision of federal law. However, ECEA Rules stipulate that only licensed teachers can provide the primary instruction to gifted students. ECEA also retains the term, "qualified personnel" to mean educators with an endorsement or high degree in gifted education; or, an educator working towards endorsement or a higher degree in gifted education. Talk with the director/coordinator, and other stakeholders if applicable, about personnel delivering instruction for gifted students.

Can a PARA provide instruction to a gifted student?
Differentiated instruction responsibilities lie with the teacher, student, and principal. Paraprofessionals may facilitate enrichment and supervision of students when working on assignments or projects.

Budget

What will the CGER team review in terms of our gifted budget?
During the Desk Audit, the CGER team will:
- Consider what are the collaborative efforts to budget and expend gifted funds?
- Review past budget reports that are inclusive of descriptions of use of funds
- Analyze funds for allowable expenditure
- Assure that there are contributing cost from the AU
- Analyze budget reports in DMS compared to district budget reports in terms of gifted expenditures
- Ask questions about data that seems disparate to program plan; expenditures that are over or under expectations

What evidence can show our budget process is "collaborative?"
Evidence may include but not be limited to:
- Needs assessment and follow-up with peer dialogue
- Agreement with AU leadership on use of funds
- Budget decision with input from a representative advisory committee
- Consensus with member districts about the reimbursement process for accessing gifted education funds
- Conversation with the director/coordinator
- Survey results

As a BOCES, our AU "flows through" funds to support district-level gifted programming. How is our AU accountable for these funds?
An end of year budget report from member districts is evidence. The BOCES must show correct expenditure of funds in terms of how the AU distribution funds were expended. If the AU distributes money to individual districts, the AU must develop a method of accountability for how districts expended the flow-through funds. The AU **must** also indicate on the budget reports any additional funds the districts provide to support gifted education through 3150 expenditures. Member districts may require guidance on accountability of funds and reporting of all expenditures to 3150 that are aggregated into the AU's budget report. For additional guidance on gifted budgets, visit:
https://www.cde.state.co.us/gt/budget

Reports

If an error was made in our October count data for gifted students, is this an area of non-compliance?
AUs report gifted demographics via the October enrollment count. If the desk audit or site visit finds errors in the data collection then corrective action is required for accurate reporting. The CGER team uses the October 1 enrollment count for the desk audit. That does not preclude the Director from including most current enrollment information in the Self-evaluation and AU overview presentation. If significant identification changes occur after the October 1 pupil count, the AU may provide this information within the Self-evaluation narrative describing the analysis of demographic data.

What is meant by an AU having "methods and tools for accountability to monitor" achievement and growth?
Evidence of "accountability to monitor" is what the AU is doing with the demographic and performance charts provided to AUs via the Data Management System. Schools and districts have responsibilities to disaggregate data to inform improvement efforts. CDE provides charts of data to assist the AU with the monitoring process. However, just including these charts in the AU Self-evaluation is not monitoring. Monitoring includes the action plan and how the AU will measure progress. The UIP Addendum shows monitoring of performance. Evidence of completing an Improvement Timeline shows accountability to correcting program elements of non-compliance.

What reports are we required to complete?
- Expended Budget - 9/30
- Adjusted Budget - 9/30
- October enrollment – 10/1
- Assurance Page - 4/15
- Annual Plan - UIP Addendum (no later than 4/15. Must be submitted when and with the district's UIP)
- Comprehensive Program Plan – revision period matched to timing of the AU CGER
- Self-Evaluation and Evidence during CGER
- Improvement Timelines – continuous until corrective actions completed

Record Keeping

What must be included in an inventory?
The local policy defines capital and non-capital equipment. The AU's equipment inventory is housed using the local record keeping system. If none exists, then the administrator for the AU's program plan determines how this inventory is maintained. An AU shall keep an inventory record of all equipment purchased with state gifted education categorical funds [12.08(2)]. The record must be maintained for the useful life of the equipment as in local policy.

What evidence shows our AUs follows laws for student records?
A description of the secured storage system is evidence that may include but not be limited to:
- Name of student information vendor
- How stakeholders access the records
- How the student profile and working sections of the ALP are connected
- Conditions of Personal Identifiable Information (PII)
- A description in the Comprehensive Program Plan

Procedures for Disagreements

What are the required components for a Procedure for Disagreements?
The Rule contains essential procedures *for resolving disagreements with parents/guardians, or students in regard to identification, programming, and ALPs. Procedures shall include but need not be limited to:*
- *a method for the aggrieved individual to express issues and* concerns;
- *a means to discuss disagreements in a timely manner with personnel designated by the district with authority to resolve the disagreements*
- *procedures shall afford the aggrieved individual notice of the decision giving rise to the dispute and*
- *an opportunity to be heard before the decision is implemented*

The procedures must be posted for ease of access by stakeholders.

Where must this be posted?
Posted typically means website. If the local administrative unit does not have capacity for this posting, ask about or look for evidence that shows parents have ease of access to the Disagreement Procedure. (e.g, parent brochure, handbook, links to the district's office of gifted education, and distribution at an ALP conference)

Does this need to be a school board POLICY?
No. This does not need to be in board policy. Board policies are typically general in nature for the benefit of every student, educator, and family.

Monitoring

Does monitoring simply include participating in the CGER process?
No. Monitoring includes providing evidence of how the AU:
- Reviews progress for established targets outlined in the comprehensive plans
- Reviews progress on performance target established in the annual plan (UIP Gifted Addendum)
- Analyzes annual enrollment reports
- Completions of CGER Improvement Timelines to address corrective action for areas of non-compliance

If the AU's member districts do not have a current UIP Gifted Addendum on file with CDE, does this constitute an area of non-compliance?
Yes. The UIP Gifted Addendum is the Annual Plan required under Accountability.

If an AU is not monitoring demographics are they out of compliance?
Yes. The law provides CDE authority to make rules for: procedures regarding identification of gifted children and the collection of data on their areas of giftedness. C.R.S. 22-20-203
The procedures for data collection include data analysis to inform identification practices. The rule of thumb is an AU's gifted population should mirror the local community. The Office of Civil Rights is concerned with fairness, equity, and access of all student groups to gifted identification. AUs should provide evidence in the Self-evaluation or during the overview presentation of analysis of demographics for the purpose of inclusion practices.

Early Access

If our AU's Early Access Plan was accepted by CDE, will it be part of CGER?
Yes. The CGER team will look for evidence that the Early Access Rules are implemented. Provisions according to Rules must be evident in the Early Access Plan.

Where can I learn more?
- Gifted Program Questions:
  Jacquelin Medina, Director of Gifted Education (medina_j@cde.state.co.us)
- Regional Support
  Contact your Regional Gifted Education Resource Consultant (GERC)
- View additional CGER Resources: https://www.cde.state.co.us/gt/cger