TDSB - Special Education Plan ("Plan") - SEAC Feedback by Sections

Section D: INCLUSION DELIVERY MODEL BY EXCEPTIONALITY

Two Notes on This Document

Texts preceded by asterisks are notes and comments of the Special Education Plan working group, which produced this document, and are informed by discussions with and among SEAC representatives, parents, and members of this group.

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Resource Support

Regular Class Placement (p. 43)

Special Education Class Placement

Special Education Class with Partial Integration (p. 44)

SEAC Feedback: Clovis Grant

- Paragraph on partial integration: significant concern about the implementation of a more inclusionary model and elimination of the HSP program, my concern is the lack of support that will be provided in-class to teachers. Without the adequate support in place, the only recourse would be for kids to remain in ISPs based on the high numbers of kids that will be in a classroom. What are the measures that will hold the Board accountable with providing the supports in place and not use the Inclusion model as a money saving measure? Why do teachers have to constantly fight to get the appropriate EA/SNA support in place to support their class? It is unfair to the teachers and unfair to the children, and this inclusion model is just an exercise on paper with no real way to implement. I am also concerned about the lack of training had by many teachers to truly be able to implement an inclusion model. In the past, only specific teachers interested in spec ed would take the AQ. What is being put in place to provide teachers with the mandatory training needed to implement an Inclusion model? What are the accountability measures to ensure that assessments of students who are in ISPs annually also consider opportunities for these students to move towards a more inclusive model? My concern is that ISPs become a "life sentence" for students.

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Special Education Class Full Time (pp. 44-45)

Early Intervention Programs

Kindergarten Early Language Intervention (KELI) (p. 45)

Diagnostic Kindergarten Program (DK) (pp. 45-46)

Intensive Support Programs (ISP) (p. 46)

Intensive Support Programs and Locations by Exceptionality (pp. 47-84)

In this section, each subsection below outlines the definition of the exceptionality, the determination of the exceptionality, the IPRC placement process and options, program descriptions and locations.

SEAC Feedback: George Petrovic (LC4)

- This section covers the entire identification and placement methodology by exceptionality. It's not just limited to ISP but also covers regular class placement, so I recommend the heading be updated to reflect this.

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Behaviour (pp. 47-49)

SEAC Feedback: Clovis Grant

- Behaviour as a category should be eliminated. It is a catch-all category that I am not sure how effective it is, and it seems to be the place where racialized and low SES students with no real special education needs end up.

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Communication (pp. 50-63)

Autism (pp. 50-52)

SEAC Feedback: Julie Diamond (Autism Ontario)

- A selection of professional learning opportunities are still available to meet teacher needs, tiered according to differing degrees of teacher experience and expertise in working with students with Autism Spectrum Disorder. My question is that I find '... according to differing degrees of teacher experience and expertise...ASD' explanation vague. Which teachers fall into which categories of all, some and few? It would be helpful to know if there is some expectation or criteria.

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Deaf and Hard of Hearing (pp. 53-55)

SEAC Feedback: Paul Cross (VOICE)

- Deaf and Hard of hearing students are a relatively small population at TDSB. But as of June 2019, according to the Special Education Report, there were 260 students in the board.
    - How they are placed in classrooms is likely of interest. At VOICE, of course, our focus is on Deaf and HH children who learn to speak and who listen using hearing technology including hearing aids and cochlear implants.
    - For many of our parents, it's a goal to have their children placed in what the board would call a "regular" classroom. For many other families, whose children communicate with American Sign Language (ASL) the goal might be to have a classroom of peers; an ISP (intensive support program). That may be their gold standard.
    - As of June 2019, the board had 111 students in regular classrooms; 141 in ISP; 8 in HSP. Total = 260 + 11 pupils in Deaf/HH pre-school*
    - I also noted students and services for Blind and Low Vision needs; some overlap (i.e., children with Usher Syndrome) 29 in regular classrooms; 11 in ISP; 0 HSP. Total 40.

    - Page 155 in the report shows the itinerant teachers and support staff dedicated:
        - 29 Hearing Itinerant – who visit students in their home school
        - 1 (I believe) audiology technician
        - 16 Blind/low vision itinerant
        - 9 ASL facilitator/interpreter
        - 11 Deaf/Blind intervenors
- There's a significant point to me on page 165 regarding staff allocation, including the duties of the Special Education Coordinator for Deaf/HH programs. Important because auditory-verbal learning or auditory-verbal therapy are very important but were not previously well-supported in TDSB, especially before 2020. So, it's relevant to note the staff listed in other areas as therapists, including physio and occupational therapists, page 157. Helpful auditory-verbal learning and / or auditory-verbal therapy should also be provided to Deaf and Hard of Hearing students.
- Perhaps TDSB will implement principles of auditory-verbal learning in pre-school/JK now?
- I understand more students across TDSB will soon have the option of choosing to learn ASL at school; that's a good thing to know.
- So, we have a small population, and a concern at VOICE has always been to make sure they don't get overlooked or fall through the cracks, so-to-speak. Some get very few itinerant visits. I received few requests for support from parents over my years at SEAC.
- For me the issue with the Special Education report or plan is this cataloging and numeration; it does not really reflect student needs, how they are met, and outcomes. Much discussion at meetings surrounds even lower incidences of students in extreme high needs; so, one needs to be vigilant on behalf of the families we represent.

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Learning Disability (pp. 56-59)

SEAC Feedback: Nadia Persaud (LDAT)

See multiple comments on learning disability from the Nadia Persaud, the LDAT representative, in the "Additional Comments" section and elsewhere below.

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Speech Impairment (pp. 60-61)

Language Impairment (pp. 62-63)

Intellectual (pp. 64-73)

Developmental Disability (pp. 64-66)

SEAC Feedback: Aliza Chagpar (Easter Seals)

- P. 66 "The programs have consultative support of Professional Support Services staff, such as an occupational therapist/physiotherapist (OT/PT), speech-language pathologist, psychologist and social worker, who provide input regarding programming strategies to address the often complex needs of this community of learners."
    - This paragraph on supports reads as though PT/OT/SLP services are offered in this placement as opposed to having access to services regardless of placement. It is recommended that this be clarified.
- It is recommended to have a roadmap for parents that is almost like a comparison tool to help parents, especially those who have English as a second language, understand what changes occur between placements and what changes between exceptionalities. Even parents for whom English is a first language are very confused with the wording. It would be helpful to have a visual way to quickly say what's available between different supports.

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SEAC Feedback: Izabella Pruska-Oldenhof (LC 4)

- P. 64 The Ministry of Education definition of developmental disabilities included in SEP: "MINISTRY OF EDUCATION DEFINITION

  A severe learning disorder characterized by:
  a. an inability to profit from a special education program for students with mild intellectual disabilities because of slow intellectual development;
  b. an ability to profit from a special education program that is designed to accommodate slow intellectual development;
  c. a limited potential for academic learning, independent social adjustment, and economic self-support."

- Developmental Disability is an umbrella term, which encompasses cognitive and physical disabilities that originated in an individual before 18 years of age. Some people might have intellectual or physical developmental disabilities, and some have both. I fully understand that TDSB's SEP, like those of other school boards in Ontario, follows the Ministry of Education's Special Education in Ontario, Kindergarten to Grade 12: Policy and Resource Guide (2017) http://www.edu.gov.on.ca/eng/document/policy/os/onschools_2017e.pdf, and therefore includes the Ministry's definitions for all exceptionalities. However, the Ministry's definition of developmental disabilities might be quite confusing for parents, especially those for whom English is the second language, and also quite possibly the teachers, as it departs from the established definitions of developmental disabilities in the medical literature, as well as in other provincial documents and policies that are actually consistent with the medical. As members of SEAC we have the responsibility to make sure that definitions—including those created by the Ministry of Education—are consistent and follow those created by experts in the field and that they avoid obscurities.

  - I pasted below the definition that our provincial government uses in its 2008 Act, "Services and Supports to Promote the Social Inclusion of Persons with Developmental Disabilities.":

    Services and Supports to Promote the Social Inclusion of Persons with Developmental Disabilities Act, 2008, S.O. 2008, c. 14

DEVELOPMENTAL DISABILITY

(1) A person has a developmental disability for the purposes of this Act if the person has the prescribed significant limitations in cognitive functioning and adaptive functioning and those limitations,

(a) originated before the person reached 18 years of age;

(b) are likely to be life-long in nature; and

(c) affect areas of major life activity, such as personal care, language skills, learning abilities, the capacity to live independently as an adult or any other prescribed activity. 2008, c. 14, s. 3 (1).

(2) In subsection (1), "adaptive functioning" means a person's capacity to gain personal independence, based on the person's ability to learn and apply conceptual, social and practical skills in his or her everyday life; ("fonctionnement adaptatif") "cognitive functioning" means a person's intellectual capacity, including the capacity to reason, organize, plan, make judgments and identify consequences. ("fonctionnement cognitif") 2008, c. 14, s. 3 (2). https://www.ontario.ca/laws/statute/08s14?_ga=2.138940855.565426110.1613080438-379761557.1613080438#BK3

- The Provincial Ministry of Children, Community and Social Services definition of developmental disabilities is also consistent with the 2008 Act.

  "Generally, developmental disabilities: affect a person's ability to learn and apply conceptual, social and practical skills in their everyday life; affect a person's intellectual capacity, including the capacity to reason, organize, plan, make judgments and identify consequences; originate before a person reaches 18 years of age; and are likely to be life-long in nature" https://www.mcss.gov.on.ca/en/mcss/programs/developmental/information/index.aspx

  - It is important to note that the Ministry of Children, Community and Social Services makes a point to emphasize that this is the new definition of DD and "The new definition of developmental disability is not based strictly on IQ. It also considers how a person handles common demands in life and how independent they are compared to others of a similar age and background". In other words, it includes both the intellectual and physical.

- Ontario Ministry of Education definition is also quite problematic in terms of choices of words, e.g., "profit", which might be more appropriate in the ministry of finance, and "**inability to profit"** and "**limited potential"** cast these

students in a very negative light and thus border on being offensive. Plus, this is less a definition, which describes the condition, and more what one would consider as "outcomes" of having this condition. The ministry presents it as a learning disorder but often DD comprises other, more complex and comorbid disorders.

- For sake of clarity, I would recommend that in addition to the existing Ministry's definition of DD, that TDSB either include the definition of DD from the "Services and Supports to Promote the Social Inclusion of Persons with Developmental Disabilities Act, 2008, S.O. 2008, c. 14." or a paraphrased version of it somewhere in the DD section of Special Education Plan.

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Giftedness (pp. 67-70)

SEAC Feedback: Nadia Persaud (LDAT - Learning Disabilities Association of Toronto)

- P. 69 "Once an offer of placement to a Special Education Class for Giftedness has been declined and a student is attending the regular class, a later requested change in level of support from the regular program to a Special Education Class placement must be done through a Central or Learning Centre Review IPRC."
  - If the child has been identified before with a placement to a special education class for giftedness, why are they then again required to go through a central or learning centre review IPRC?
  - This is perceived by parents as an unnecessary, excessive 'barrier to entry", designed only as an additional hurdle to block or discourage families from pursuing placements in Gifted ISPs (MR).
  - This is also procedurally incorrect. After a Gifted identification has occurred, a change in placement should only require a standard IPRC meeting, which the parent should be able to request in writing to the Principal in the ordinary course. The choice of placement, including a request to change the placement, is the parent's decision, and requires no extraordinary placement hearing. If the identification criteria have been met, an ordinary placement hearing (a regular IPRC) is sufficient. (MR)
  - It is recommended that this unnecessary hurdle be eliminated.

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SEAC Feedback: Melissa Rosen (ABC – Association for Bright Children)

A summary of feedback on the Giftedness section of the Special Education Plan is provided in SEAC Feedback: Melissa Rosen (ABC – Association of Bright Children) of the Additional Comments section in this document.

Specific feedback on the Giftedness section of the Special Education Plan is provided in Appendix C: Recommended Changes to 2020 SEP – Giftedness Section.

More detailed feedback and additional recommendations are provided in Appendix D: Feedback on TDSB 2016 Special Education Plan regarding gifted students: Melissa Rosen

Also, some myths and misconceptions are explored in Appendix B: Some Myths and Misconceptions about Gifted Education: Melissa Rosen

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Mild Intellectual Disability (pp. 71-73)

Physical (pp. 74-77)

Blind and Low Vision (pp. 74-75)

SEAC Feedback: Nadia Persaud (LDAT, Learning Disabilities Association of Toronto)

- P.75 "The TDSB does not have Special Education Class placements solely for students with the Blind and Low Vision exceptionality. All students who receive support through the TDSB Vision Program attend their local schools or, when placed by IPRC, may attend another specialized program that addresses an additional special education exceptionality-related instructional or support need. As of June 2018, TDSB is serving 396 students with Blind/Low Vision special education needs." (p. 75)

- Not enough support for the blind and low vision exceptionality as they are still attending local schools unless IPRC is requested to attend a specialized program. There is evidence that TDSB encounters this population and therefore it is recommended that TDSB should consider programs in local schools.

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Physical Disability (pp. 76-77)

Multiple Exceptionalities (pp. 78-79)

There are questions that were raised about this category. It may be helpful to clarify the applicability and use of this category.

Regional Support Services (pp. 80-83)
External Options for Full Time Support (pp. 83-84)

Additional Comments on the Entire SPED Plan & Other General Comments

SEAC Feedback: Clovis Grant

- SPED Section C: P. 24, Inclusion Strategy Reasons for an IEP
    - "It is the principal's responsibility to ensure that parent(s)/guardian(s) are informed about interventions used to assist a student who is having difficulty meeting the grade level expectations."
        - This needs to also include more than awareness of the interventions but also impact to the student's academic future on the different choices that are made with respect to Accommodations, vs Modifications vs Alternative.
- SPED Section C: P. 34 SEPRC steps
    - Language should be tightened to state that the parents may still register their child at their home school while the principal identifies "access to central resources ".
    - Too often, parents have to withhold the child from school when, in fact, they are allowed to register their child. With no timelines in place as to when resources will become available, there is no obligation on the part of the principal to help speed this process along and the child is stuck at home as a result.

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SEAC Feedback: George Petrovic (LC4)

- Compliance of TDSB's SPED Plan with the Ministry of Education standards:
    - The Ministry sets standards for special education plans and the TDSB plan is not compliant with the Ministry standards in multiple ways. Some of the most obvious issues are:

1 - Consultation - where is the process for how parents of special education students can provide their feedback, and where is the consolidated list of the feedback received?

2 - IPRC process - where is the list of the number of IPRC referrals, reviews, and appeals conducted last year?

3 - Specialized health support services - the chart shown doesn't include the info required by the Ministry.

4 - IEPs - where are the results of the Ministry's review for the previous year and any response by the board?

5 - Accessibility of school buildings - in multiple ways the TDSB plan is not consistent with the requirement.

*Additional questions were raised in the SPED Plan working group about what are the MOE standards / checklist requirements for each Board's Special Education Plan review and MOE approval each year (in July)? It would be appreciated to receive information about this.

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SEAC Feedback: Diane Montgomery (LC4)

- After reviewing both section C and D, the biggest parts of my feedback relate to the entire process flow and some missing pieces of the flow that I think should be highlighted before the IST, which include the ILP, UDL /differentiated instructions and discussions on anti-oppression, anti-racism, equity and inclusion. As such, I put together a document attached to outline by feedback and Recommendations of the changes to the referral flow process as well as comments within the relevant sections and pages of the plan that may also require revisions.

*See the document provided by Diane in the original format as a table in Appendix A: Special Education Plan Feedback by Diane Montgomery or in the accessible format with a transcription of the table into text in Appendix AA: Special Education Plan Feedback by Diane Montgomery (accessible version).

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SEAC Feedback: Nadia Persaud (LDAT, Learning Disabilities Association of Toronto)

Many of my comments relate to the Learning Disabilities section, pages 56-59, and to other areas of the SEP and its implementation.

- Information in the guide is helpful in supporting parents. The layout is improved, and information is clearer than in previous years.
- SPED Section C: Some common questions and feedback around timelines and processes for IPRC, IEPs:
    - IPRC Attendance - Parents not always informed that they can and should attend the IPRC.
    - Parents are often very frustrated because their input is not considered or accepted during the development of the IEP.
    - Information should be clearly included on how parents should proceed if they don't agree with the IPRC and / or IEP.
    - Individual approaches are so important to supporting children/youth with exceptionalities.
    - Why do students need to be 2 grade levels behind before they are considered for assessment/identification?
        - Identification or intervention comes too late. By the time the assessment, IPRC, IEP processes are complete the student is more behind and frustrated, making it even more difficult for them to catch up.

      *This is unnecessary, extremely stressful, and is very bad pedagogy. Learning disabilities / challenges are often apparent earlier and should be addressed earlier, to ensure better opportunities for success. Also, this arbitrary rule unnecessarily penalizes students / families who are struggling on their own to try to stay less than two grade levels behind.

        - Wait times for assessment are very long (several years in many cases).

      *This is unacceptable and is a predictable formula weighted to causing failure and unnecessary hardship.

        - Early assessment = earlier support and smaller gaps in learning.
- SPED Section C: Issues of non-compliance with IEPs or with the process of obtaining one.
    - The Special Education Plan captures the steps and processes taken to support students in TDSB, yet parents are not provided with enough information or resources as to what to do if TDSB is not following the special education process. For example, who do parents contact if the classroom teacher isn't following the IEP? Information should be provided on what parents should do when this occurs.

        - How can they track/document this?
        - Who should they contact at the school/school board if there are problems with the classroom teacher?
        - Clear information on steps to take would diffuse a lot of frustration on the parents end and would reduce conflict between parents and teachers.

          *Addressing this would also be a very effective way to significantly improve students' learning experience and outcomes.

          *These concerns about issues of non-compliance with IEPs and with the process of obtaining (effective) IEPs are very frequently voiced by parents of students with all types of learning challenges and exceptionalities. See additional feedback in *SEAC Feedback: IEPs section further in the document.
    - Parents struggle to request an IPRC meeting or get an IEP for one child and are discouraged to go through the process again with the school for their other children.

      *This seems to some parents to be a deliberate barrier inappropriately created by some staff.
- More General Comments
    - It is unclear what placements and support are being offered to students in place of other programs that have been removed, like the Home School Program.
        - PPM 8 acknowledges this in these statements: "School boards, schools, and educators may put intervention strategies in place to support students with learning disabilities through a tiered approach, in which high-quality, evidence-based assessment and instruction are systematically provided and respond to an individual student's strengths and needs. The nature, intensity, and duration of interventions are always determined on the basis of evidence gathered through frequent and systematic monitoring of the student's progress. Systematic, sequential instructional approaches use specific instructional interventions of increasing intensity to address targeted learning needs of students with learning disabilities."
    - There is a need for more teachers trained and/or with experience in special education.
        - Personal Experience - There is a lack of support staff for students in special needs classrooms who require two to one workers. Staff who are not certified to work two to one with students are supervising to cover off when primary staff are on break, etc.

        - One parent expressed that TDSB provided the child with additional support from a resource teacher, however the teacher was presently completing her special education training and did not have enough knowledge/experience and had not completed the course to put the support in effect.
    - Consider placements of special education classes and early intervention programs in more schools so students don't have to switch schools to get the support they need.

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SEAC Feedback: Juanita Beaudry (Centre for ADHD Awareness, 'CADDAC')

- **K - Gr.1 – 'Primary IEP Strategy'**
    - The TDSB should reconsider their K-Gr. 1 IEP strategy, while I applaud the effort being made to look further into anti-black racism within the board, I believe the proposed strategy will have the reverse effect on these children. This strategy will make it more difficult for black children to receive accommodations without an IPRC designation. As indicated earlier there are many disabilities that do not fall under the Ministry of Education special education guidelines, but that does not mean these children do not have a disability and do not require accommodations.
    - Before moving ahead with the K-Gr. 1 IEP Strategy, The Centre for ADHD suggests answering the following questions:
        - Look further into why these children are recommended for an IEP.
        - Identify the barrier these children are facing by receiving an IEP if any?
        - Looking at a breakdown of how many black students are in HSP or ISP programs versus just an IEP?
        - Understand who is initiating the IEP - teacher or the parent?
        - Understand how many of these children have a recognized disability as defined under the Ontario Human Rights Code, i.e., mental illness, neurodevelopmental disorder, etc.

- On a side note, in the United States schools have the opposite issue with black students, in that they are not receiving the accommodation and supports they need because their academic difficulties or behavioral issues are considered cultural rather than medical. **It is never a bad thing to provide a child with too much help!**

* See also below additional feedback on the new Primary IEP Strategy.

- **Special Education Policy – Part D – Inclusion: Interpretation of the Categories of Exceptionality**

  * TDSB's too literal and narrow interpretation of the Ministry of Education's categories of exceptionalities in the Education Act leads to exclusion of numerous students with disabilities. See below for a discussion of recommendations about the important memorandum from the Ministry of Education ("Categories of Exceptionalities," **Memorandum to Directors of Education**, et al, December 19, 2011) to clarify the Ministry's categories of exceptionalities and how the boards should interpret them.

Special Education Policy – Part D, Inclusion

The Ministry of Education's special education guidelines of exceptionalities if interpreted as literally as the TDSB is doing are discriminatory under the Ontario Human Rights Code. There are many disabilities that do not fit into any of the special education categories, such as Attention Deficit Hyperactivity Disorder (ADHD), Fetal Alcohol Spectrum Disorder (FASD), Tourette's, and most mental illnesses, as an example. Currently the TDSB has approximately 5% or 12,500 students with ADHD, 3% or 7,500 students with FASD, and 4% or 10,000 students with anxiety in their school board. Based on their current policy the TDSB is failing to meet the needs of approximately 30,000 students and is infringing on those students' right to learn.

The Ministry of Education states, "The broad categories of exceptionalities set out in the Education Act are designed to address the wide range of conditions that may affect a student's ability to learn, and may include any medical conditions, such as ADHD whether diagnosed or not, that can lead to particular types of learning needs. *The inclusion of some medical conditions in the definitions of exceptionalities, in policy documents, is not intended to exclude any other medical conditions that may result in learning difficulties, such as ADHD."* *emphasis added

In December of 2011 the Ministry developed and distributed to all Directors of Education a Memorandum on categories of exceptionalities, reiterating the above statement and also stating that "*Some of the areas in which a student with ADD/ADHD may have demonstrable learning needs include (but are not limited to) attention/focus, organization, processing speed, working memory, executive functioning weaknesses, mathematical processes and skills, and expressive and receptive language. A student who*

presents with such learning needs can be identified within the Communication (learning disability) exceptionality category, regardless of whether the medical criteria for a Learning Disability are met." *emphasis added

Consequences of not being IPRC'd

1. While the TDSB will provide IEPs for some students without exceptionalities, there is no consistency or equity in how this occurs across the board (TDSB). It is entirely up to an individual school, often solely at the principal's discretion, whether an IEP is implemented and remains in place. So, a child can receive accommodations one year and have them removed the following year depending on the teacher/principal. When a child is diagnosed with a permanent disability it means the disability does not go away, therefore the supports and accommodations must remain in place until the child is finished school. Parents are frustrated that they must fight for an IEP every year, and for some parents this is much more difficult than others as they can be dealing with their own disabilities. For example, ADHD is hereditary, so approx. 80% of parents of children with ADHD also have ADHD themselves. I am curious to know if the TDSB takes that into consideration when working with the families?
2. Parents are also very frustrated when told their child needs to be behind at least 2 years academically in order to qualify for supports. How far a student is behind academically should not be taken into consideration when determining the need for support. Supporting a child with a disability such as ADHD (alone) will ensure they function at grade level. Alternatively, removing those supports because they are functioning at grade level will create stress, anxiety and often a decline in grades for the student.
3. Also, when an IPRC is not given to a student with a disability, the principal does not have to consider the child's disability when punishing the child for behaving inappropriately. Impulsivity, hyperactivity, emotional dysregulation, and impairment in self-regulation, are all symptoms of ADHD which can get a child into trouble in school. The result is kids are continuously being suspended or disciplined for their medical disability.

Consequences for Students with ADHD

It is well documented that children diagnosed with ADHD suffer from problems in daily life functioning as well as difficulties in school (Kuriyan et al., 2013). Classroom challenges mainly include disruptive behaviour and academic underperformance which often persist into middle and high school. Adolescents with ADHD have lower grades, are more likely to be suspended or expelled, fail a class, and have higher rates of absenteeism (Kuriyan et al., 2013). Studies show 26% of students with ADHD have failed or repeated a grade and 32.2% do not graduate high school. (Breslau, 2011, Fried et al., 2013). Because of the difficulties in high school, only 30% of students with ADHD go on to university with only 15% completing a four-year degree (Kuriyan et al, 2013). Despite the difficulties

children with ADHD encounter in school; the TDSB does not recognize ADHD as a disability that warrants classroom accommodations.

Recommendations

1. That the TDSB systemically interpret the Ministry's categories of exceptionality more broadly as some other school boards have done and as they have been instructed to do by the Ministry, which would allow more students with disabilities to receive IPRCs.
2. Provide regular and ongoing education for TDSB staff members on the most common disabilities students within the board face, so staff are better equipped to deal with situations as they arise.
3. Make the process of providing accommodations and supports easier for TDSB staff and parents (many parents are confused by the current Special Education system).

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SEAC Feedback: Izabella Pruska-Oldenhof (LC4)

- Special Education Plan, Section D: List of Intellectual Exceptionalities on pp. 64-73 and in the List of Contents on p. 43
    - For sake of consistency, the list of Intellectual Exceptionalities should follow the same order as in the Ministry of Education's other materials, e.g., Special Education in Ontario Guide, which was used in creating this document. Link: http://www.edu.gov.on.ca/eng/document/policy/os/onschools_2017e.pdf
        - Intellectual: Giftedness
        - Intellectual: Mild Intellectual Disability
        - Intellectual: Developmental Disability
- Special Education Plan, Appendices

- Appendix J: Glossary of TDSB Terms – This glossary is only three pages long and is key to understanding of the Special Education Plan, especially for people unfamiliar with technical terms used throughout this document. I am thinking of parents here.

  Recommendations

  - Please include the glossary in Section A, as part of the introduction to the Special Education Plan document. Place it at the end of Section A.

- Appendices A to K – Appendices in SPED Plan comprise 11 individual documents. However, in order to know what these documents are one has to download the entire appendices file as the list of these documents only appears in this document. Moreover, one has to scroll through the entire document to get to the section one needs.

  Recommendations

  - Please divide the appendices into individual documents and make available to download.
  - At the very least, please include a list of contents of the appendices on the website.
  - Lastly, since there are 11 appendices in this section of the SPED Plan, please change "Appendix" to its plural form "Appendices".

- Special Education Plan, Table of Contents
  - The entire SPED Plan should have a table of contents available either as a one-page, downloadable and hyperlinked document or as a text that appears on the webpage with links to individual sections that can be either downloaded as individual documents or viewed online.

    Recommendations

    - Please created a table of contents available either as a one-page, downloadable and hyperlinked document or as a text that appears on the webpage with individual links to each section of the Plan (including individual appendices) that can be either downloaded as individual documents or viewed online.

  - Why doesn't SPED Plan exist as a website with individual hyperlinked pages for each section but instead has to be downloaded as a document to seen/read? Text-only websites are quite small in size, quick to load and do not eat up too much data. This is especially important for people with limited access to the Internet and limited data plans.

- My suggestions not intended to replace the present option of downloading the entire SPED Plan document as one file. This is a good option to have, and I am glad that it exists. My suggestions are simple design adjustments that will provide quicker access to important information contained in the TDSB's annual SP ED Plan and, therefore, better communication within its own community (students, teachers, parents) and with the public at large.

- *Supporting Children and Students with Prevalent Medical Conditions*
  - Nowhere in the entire SPED Plan is there any mention of TDSB supporting students with prevalent medical conditions, which is a relatively new (fall 2018) addition to the Board's Policy P092: Student Health Support, based on the Ministry of Education new policy (2018) PPM161 "SUPPORTING CHILDREN AND STUDENTS WITH PREVALENT MEDICAL CONDITIONS (ANAPHYLAXIS, ASTHMA, DIABETES, AND/OR EPILEPSY) IN SCHOOLS".

    Recommendations

    - Please include in the SPED Plan a summary of this new addition to health supports available at TDSB.
    - Please provide in the Plan links to P092 and to other appropriate documents (Individual Plan of Care for each prevalent medical condition, quick facts, guides, etc.) for each of the four conditions, as per the Ministry of Education request in PPM161. The Ministry prepared these documents and other useful resources on the four medical conditions for school boards to use and share on their websites.

  - Please note that although PPM161 "Supporting Children and Students with Prevalent Medical Conditions" is referenced and reflected in TDSB's P092, it is doubtful that this addition was well communicated to all TDSB teachers and staff and implemented since the key documents for implementing it (the customized for each of the four medical conditions Individual Plan of Care forms that including rescue protocols) are missing on the website, and in personal exchanges with Special Education teachers none were familiar with it.

    Recommendations

    - Please include in the forms and policy section of the TDSB's website **Individual Plan of Care** forms for each of the four conditions, as per P092: Student Health Support.
    - The Ministry of Education produced a guide "Administrative Framework—Developing a Board Policy on Prevalent Medical Conditions" with templates for the boards to use for each of the four conditions. These are very detailed and serve also as a good learning resource for those with whom they need to be shared at the

school. Please include on the TDSB's website guides, quick facts and other informational materials prepared by the Ministry on these conditions. Please include these in the Special Education section of the website and in the forms section. Below are links to the templates, as well as a guide and quick facts on the four conditions:

- Guide (including templates for each condition) https://www.oesc-cseo.org/en-ca/Documents/PMC_Admin_Framework_Final_Feb28-18.pdf
- Links to Plan of Care templates: https://oesc-cseo.org/en-ca/SitePages/RESOURCES/Templates%20&%20Sample%20Documents/Prevalent-Medical-Conditions.aspx
- Quick Facts on Asthma, Anaphylaxis, Diabetes and Epilepsy (would be useful on the Special Ed website in resources):
    - Asthma http://www.edu.gov.on.ca/eng/healthyschools/pmc_asthma_fact_sheet_en.pdf and a video https://www.youtube.com/watch?v=aCeNK32gSOc
    - Diabetes http://www.edu.gov.on.ca/eng/healthyschools/pmc_diabetes_fact_sheet_en.pdf
    - Anaphylaxis http://www.edu.gov.on.ca/eng/healthyschools/pmc_anaphylaxis_fact_sheet_en.pdf
    - Epilepsy http://www.edu.gov.on.ca/eng/healthyschools/pmc_epilepsy_fact_sheet_en.pdf

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SEAC Feedback: Steve Lynette (Epilepsy Toronto)

- In terms of Policy P092: Student Health Support, I think this should go on a list in an Appendix of additional supporting documents and forms.
- Also, I believe that this form about administering medication came about as a result of discussions with SEAC and staff.

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SEAC Feedback: Jordan Glass (LC2)

- Having had the time to re-read the Plan, I suppose I can only concur with David Lepofsky. The problem with the Plan, from my perspective, has never been the words in it. They are well and good and say what we want for our children, but the struggle has always been turning intent into action. That was the crux of the motions David refers to.

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SEAC Feedback: David Lepofsky (VIEWS for the Visually Impaired)

- SEAC motions #1-5: My feedback is that the Plan needs to incorporate the important measures that Special Education Advisory Committee recommended in 5 major motions passed in 2016 and 2017. To date, they have not been implemented at TDSB or incorporated in the Special Education Plan, as far as we have been told.

* The following five recommendation motions were made by SEAC:

Motion #1: The Right of Parents, Guardians and Students with Special Education Needs to Know about TDSB Special Education Programs, Services, and Supports, and How to Access Them (passed at the June 2016 meeting).

Motion #2: Ensuring that Parents, Guardians and Students Have a Fair and Effective Process for Raising Concerns about TDSB's Accommodation of the Education Needs of Students with Special Education Needs (passed at the June 2016 meeting).

Motion #3: Ensuring a Fully Accessible Built Environment at TDSB Schools (passed at the June 2016 meeting).

Motion #4: Ensuring Digital Accessibility at TDSB (passed at the June 2016 meeting).

Motion #5: The Effective Inclusion of Students with Special Education Needs at TDSB (passed in April 2017, removal of Recommendation 7 at the November 2017 meeting).

Motion #6: Refusal to Admit (parts of this motion were passed at the December 2017 meeting and in its entirety at the January 2018 SEAC meeting).

Motion #7: Inclusion = 'Not for Everyone', + 'One Size Doesn't Fit All' (introduced and passed at the December 2017 meeting, more details further down in *SEAC Feedback: Inclusion = 'Not for Everyone' + 'One Size Doesn't Fit All' (aka 'Motion #7)

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*SEAC Feedback: Motion #1 and the Need for Real Parent Choice

* In 2016-2017, SEAC passed several motions with detailed recommendations affecting some or many students with special education needs. The foundational premise of the first motion ('Motion #1') was that Parent Choice in placement and other educational matters should be determinative. This was in response to many long-standing complaints from parents of students with all special education needs, that some parents felt that some staff sometimes bullied, intimidated, failed to inform, or pressured parents into acccepting pre-determined placements or types of supports. Parents reported that staff were often either inadvertently or willfully misinformed about students' needs and best pedagogical practices, and failed to inform parents about real options or allow parents to have real choice about education options. Many parents consistently reported the absence of opportunities to engage in meaningful conversations about needs and reasonable supports, or to have reasonable escalation processes that weren't obstructionist, exhausting, or simply a confirmation of the status quo. This was the backdrop informing this first Recommendation motion, and although some staff and some processes have improved, some have not.

Parents are necessary, supportive, helpful, and well-informed partners in their children's education, and can and should be treated as helpful collaborators to achieve reasonable solutions for best outcomes for students. We continue to affirm and recommend the need for Real Parent Choice and involvement in children's education, which can help the system to deliver better education more efficiently and effectively, and most importantly can assist in achieving best outcomes for all students.

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*SEAC Feedback: Inclusion = 'Not for Everyone', + 'One Size Doesn't Fit All' (aka 'Motion #7')

Following overly sweeping, "transformative" changes recommended by the EETF in late 2017, after very limited, targeted, and mostly unknown consultations, the EETF and Director of Education floated and then retracted assertions that 'SEAC and all special education advocates all want all special education students to all only be placed ("included") iin their local 'regular' classrooms'. This was and continues to be absolutely untrue and inaccurate. There is no exceptionality for which all parents and advocates want all students to be placed in 'regular' classrooms for either the full or partial duration of their entire education. Additionally there are some exceptionalities / students where research (and parents, advocates, and students' experience) is conclusive that 'inclusion' in a 'regular' classroom is not ideal or beneficial for some / many students, and can even be detrimental.

Even parents and advocates who wish that in an ideal world their child might effectively be 'included' in a regular classroom, acknowledge that most / all regular classrooms are not able to deliver that ideal environment currently, for the foreseeable future, and for some students, perhaps ever. The ideal model is currently not feasible for even the best teachers to fully achieve, and the practical reality is that most teachers are presently over-burdened and under-educated to meet the full array of special education needs that may land in their 'regular' class from year to year.

"UDL" (Universal Design for Learning) and "Differentiation" are postulated as theoretical ways in which classrooms may function more inclusively, but the reality is that extensive staff training, mentoring, feedback, support, and / or lesson planning investment is necessary to effectively implement these strategies. However, none of these required investments are currently yet available or feasible to be sufficiently offered to or required of most or all staff.

SEAC's 'Motion #7' (copied below) was passed in December 2017, in response to and to specifically oppose this misconception, that all special education students want or will always benefit from inclusion in a regular classroom. The motion was passed in the context of extensive dialogue that 'one size doesn't fit all' and 'trying to push ("include") ALL students into regular classrooms some or all the time should not be the pedagogical model in any board but particularly in this one'.

It is recommended that real parent and student options and choice for education placements not be limited to or overly weighted / pushed by staff or by practices and processes for placement ("inclusion") in a regular classroom. It is further recommended that viable, accessible, well-supported options for full-time and partial integrated placement in Intensive Support Programs continue to be very accessibly offered and fully supported by TDSB.

The full text of the motion ('Motion #7', passed December 2017) reads:

"Whereas SEAC recognizes and supports a very diverse variety of Special Education needs and the requirement for an appropriate variety of beneficial education options for the students both identified and not identified with Special Education needs in the TDSB; and

Whereas these options must be based on best practices, and education research on how to meet different students' needs, and should offer relevant options and real parent and student choice; and

Whereas in a Board of this exceptionally large size and diversity of needs, a variety of different options to meet different and diverse needs should be offered in appropriate classroom environments;

Therefore:
The TDSB Special Education Advisory Committee (SEAC) recommends to the Toronto District School Board that the Toronto District School Board deliver a variety of appropriate education options to meet diverse Special Education needs, based on education research, feedback from educators, parents and students on all relevant options, and advocacy by those with specific involvement and experience with those specific exceptionalities."

*In the course of preparing the present SPED Plan Feedback document and reviewing TDSB's and the Ministry of Education's public-facing documents, we noticed that SEAC minutes for December 2017 indicate that a motion was brought, however, it neither specifies that it was Motion #7 nor the nature of this motion and that a vote on this motion took place and was passed at that meeting. Furthermore, unlike the other six SEAC motions, which were included as individual documents on TDSB's SEAC website, Motion #7 document is missing and there is no subsequent mention of it in the minutes of SEAC meetings in the winter and spring 2018.

Recommendation

Please revise the minutes for the December 2017 to reflect that Motion #7 was brought forward and was voted on and passed at that meeting. In addition, either paste into the body of the minutes the text of motion #7 (provided above) or add it as an individual document to the December 2017 documents posted on the SEAC website.

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*SEAC Feedback: IEPs

1) IEPs (Individual Education Plans) are high level working documents outlining what will be done to meet special learning needs of students whether or not their learning needs have been assessed or formally identified as one of the 12 historically legislated categories of exceptionalities. IEPs are required for all students who have had IPRCs, but many students have their learning needs addressed only in an IEP without the additional formal process of an IPRC. Parents must be consulted when IEPs are reviewed for each reporting period (at least once or twice annually) unless review is waived in writing by the parent. Parents, students, and teachers all benefit from the continuity of IEPs, in that all current and future successive teachers of the student have a summary starting working document that highlights strengths, areas of challenges, and plans for how to address and support those challenges.

2) For many parents and students (and teachers), IEPs are an extremely helpful and necessary 'life-line' to understanding and meeting individuals' needs and supporting students' unique learning challenges. For many parents and students an IEP is also the only thread by which parents feel that they have any right to engage constructively with staff about supporting their children's needs, or to require a minimum level of acknowledgement and accountability for supporting those needs.

3) Parents of students with all types of needs have expressed praise for the IEP mechanism, but also often express extreme frustration with deficiencies in the content of the IEPs, and / or staff's failure or refusal to follow IEP recommendations, and / or to construct IEPs that are relevant, concrete, or sufficiently specific to be of any real use.

4) Frequently cited concerns by parents include:

   - 'unfortunately, my child's IEP isn't worth the paper it's written on, and this is not how an IEP is supposed to work'
   - 'teacher / Principal won't engage in meaningful dialogue or collaboration with parent to understand student's needs and to construct a high-level statement acknowledging needs, and providing some reasonable suggestions for addressing and supporting these needs'
   - 'parents feel intimidated / bullied by staff that if parent requests or pushes for more specificity or support, then there may be retribution / no support at all for the student'.

5) IEPs are a minimal, constructive, efficient, and supportive method for sharing information about students and meeting their needs. It is recommended that staff be encouraged to view IEPs in this way (as a minimal, constructive, efficient, and supportive method for sharing information about students and meeting their needs), and to view IEPs as a positive,

collaborative mechanism (i) for better supporting students, and (ii) for reducing teacher stress about student challenges that aren't well met and are thus frustrating for teachers, staff's relationship with parents, students, and the student's classmates.

6) IEPs are often used to streamline supports to avoid the IPRC process, and to support student needs that are real but don't fall within historically narrow named 'exceptionalities'. This can be of benefit to the system, staff, students, and parents, if appropriately used. Minimal or vague comments such as "student will receive differentiated instruction" are typically too vague to be useful, and so it is recommended that some concrete (even if high) level of content be included in IEPs.

7) It is recommended that all staff and parents be provided with and be able to access online, evolving, fulsome menus of 'best practices' IEP content comments, grouped under headings / in clusters / with keyword references for ease of review and navigation. This would be very educational and timesaving for staff and parents, would easily provide staff with proven tips that work, and would help staff with overall improvement in classroom management and individual student support. This would be beneficial for staff, parents, and students, in setting reasonable expectations about workable, customizable, proven, helpful options for student support and success. This would also save staff and parents from the aggravation and extra work of everyone having to 'start from scratch' and 'reinvent the wheel' to originally construct and then progress through IEPs and student development.

8) It is recommended that TDSB share an information package with all families (and not just with those who have students who have been formally or informally identified as having special education needs), so that parents understand and can access information about the range of options, placements, programs, services, supports and accommodations available for students with special education needs. This includes information and processes about who to approach and how to consult and collaborate with about IEPs, IPRCs, and informal teacher support of suspected or known special learning needs.

9) It is recommended that TDSB also create (if they have not already created) some accessible webinars to help families learn how to navigate (and if necessary, escalate) through processes such as IEPs, IPRCs, and where to find substantive content relevant for both.

10) See also concerns below listed in SEAC Feedback about "Primary IEP Strategy".

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*SEAC Feedback: Primary IEP Strategy

Significant and very strong concerns were immediately raised by many SEAC representatives about numerous aspects of the new "Primary IEP Strategy", unveiled to SEAC as a 'fait accompli' (already implemented and communicated to staff) in early 2021. The following is: (1) a summary of some of these concerns, and (2) some immediate action items to further consider and address these concerns.

(1) **Concerns about TDSB's new "Primary IEP Strategy" include**:

a. This very significant and dramatic change to IEP policy (essentially eliminating all Primary IEPs) was considered, implemented, and publicized to and by staff without any advance notice to or consultation with SEAC. In that ALL students with special education needs typically have or benefit from an IEP, this is extremely concerning.

b. The premise – the justification – for this Strategy is that black students are over-identified in primary years because (i) they are black, and (ii) the system is racist. With respect, this seems to be an over-generalized, oversimplification about all staff / the system, and ignores actual learning challenges of students of all races, including black and non-black students.

c. An attempt to eliminate all or virtually all Primary IEPs based on a single factor (race) seems to 'miss the forest for the trees'. This also ignores so many other extremely well-researched, correlative and unrelated factors that contribute to early education challenges, and an assessment that a student would benefit from an IEP.

d. These other extremely well-researched, correlative, and unrelated factors that contribute to early education challenges include:

    i. 'late starts' and 'lack of school readiness',

    ii. disadvantaged home circumstances (including low parent education levels, single parent family challenges, low socio-economic circumstances which may be associated with parents' work schedule challenges and / or lack of resources impacting student support),

    iii. lack of family or cultural emphasis or support at home focusing on education achievement,

iv. English Language Learner homes and associated challenges,

v. parent challenges impacting children including parent addiction and parent mental health issues,

vi. parent learning challenges including ADHD, LDs, FASD, mental health issues, etc. that can impact on parenting skills and / or have a hereditary component also being passed to their children, etc.

e. Ignoring all of these other significant, documented factors that impact on achievement in school means that if the problem issues aren't identified, then effective solutions will not be identified and implemented. Labelling all issues as caused by 'racism' leads to a limited toolkit of only 'anti-racism' training or failing to provide substantive needed supports if real problems aren't identified or addressed.

f. Children of all races may and do experience any or all of the challenges listed in paragraph (d) above.

g. Cancelling IEPs for all or almost all Primary students does a disservice to all students of all races with real learning challenges, including but not limited to Black students.

h. Research is overwhelming that early identification, intervention, and support of learning challenges is crucial and most determinative of short and long term positive academic, behavioural, self-esteem, and other development issues.

i. This new Primary IEP Strategy seems to be both myopic and overly blunt. With respect, it has been observed that it seems to satisfy some staff's desire to create a measurable change that can be linked to race (a goal of the MYSP (Multi Year Strategic Plan)), by being able to report that 'XX% and YY# of black students' IEPs have been eliminated'. However, the goal should be to most effectively and qualitatively address early-identified challenges, to ensure best outcomes for every unique student, and not to engineer binary, non-qualitative, measurable reportable outcomes.

j. With respect, additional significant concerns have been raised that this is a non-transparent and inappropriate way for staff to systemically accomplish cost-cutting and / or to reduce management challenges, by finding ways to systemically significantly reduce: (i) the number of IEPs overall; and (ii) the identification and support of real special education and other learning challenges. This is a counter-productive method to address management challenges, and better solutions must be found that are reasonably and effectively focused on the best interests of all students.

k. Handcuffing teachers' and principals' ability to identify and seek individual education supports AND carry these forward efficiently into the next school year and into next year's new teacher's classroom (via an IEP), ignores many teachers' and parents' identification of and concerns about students' early learning challenges that need and would benefit from Individual Education Plans to address gaps before they become larger, more insurmountable, and emotionally debilitating. The focus should always and only be on what is in the best interests of students.

l. The 'solution' for cancelling all or virtually all Primary IEPs is that all Primary 'regular' classroom teachers (despite a crucially significant lack of special education training or specialization) should 'since we say so' now be able to intuitively and comprehensively meet ALL students' needs. This is unrealistic and unfair to both teachers and students (unfair to students both with and without extra learning challenges).

m. This solution will supposedly be accomplished by immediately implementing "UDL (Universal Design for Learning) principles and "Differentiation" strategies. UDL and Differentiation are strategies (or sometimes, placebo labels) that are aspirational but currently mostly idealistic and / or theoretical at best. Although attempts have been started to introduce these concepts to some staff (who voluntarily opt in), realistically the time and work necessary to consistently implement these strategies effectively in every classroom is a more long-term investment. This longer-term strategy is currently not yet sufficiently professionally developed or supported (now or in the near future) to adequately support the current significant array of special education learning needs.

n. Concern has been expressed that while IEPs may be unnecessarily sought for a small number of students who may not need them, there are better ways to address this specific concern than 'throwing the (whole) baby out with the bath water'. Very many students of all backgrounds may be negatively impacted by this precipitous change, including many Black and / or disadvantaged students who are the students we are focusing on trying to better support.

(2) As a result, we recommend that:

(a) Staff should consult with SEAC to seek input before decisions or implementation when considering new strategies, practices, or policies that will affect students with special education needs.

(b) TDSB's new "Primary IEP Strategy" be placed on the May and June SEAC meeting agendas, with a detailed report by staff delivered sufficiently in advance of each meeting that SEAC representatives have an opportunity to fully consider it, and if

applicable to raise thoughtful, relevant questions in advance of the meeting, for responses and consideration in the meeting and subsequently.

(c) Staff further consult and collaborate with SEAC representatives and other student and parent advocates, outside of regular SEAC meeting time, to collaborate on better solutions to address the concern(s) raised by staff regarding the Primary IEP Strategy, as well as the other concerns articulated above.

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SEAC Feedback: Melissa Rosen (ABC - Association for Bright Children)

Feedback on Giftedness Section of the Special Education Plan

(1) **Outline**

TDSB's education of Gifted students was built on significant research, best practices, and learned good pedagogy over decades, culminating in a gifted program that has been well reviewed, effective, and a lifeline to academic, social, and emotional development for gifted students from all backgrounds. Unfortunately, many changes have been implemented over the last handful of years which have worked to erode and reduce access to and the effectiveness of the program. Some of these reductions, reasons for concern, and recommended changes (many of which are essentially recommendations to revert to previous much more effective, long-standing practices) are summarized specifically in Appendix C: Recommended Changes to 2020 SEP – Gifted Students below. More detailed discussion and exploration of these same topics (in the format of "Questions", "Concerns", and "Recommendations"), are contained in Appendix D: Feedback on TDSB 2016 Special Education Plan regarding gifted students below, which is a copy of feedback previously provided to TDSB about the Giftedness section of the 2016 SEP (but which never received an acknowledgement or response from TDSB). Also included below is Appendix B: Some Myths and Misconceptions about Gifted Education, which provides additional information and context for better understanding of recommendations.

We very strongly encourage a review of this more detailed feedback and discussion of the Giftedness section of the 2016 SEP in Appendix D for better understanding and for more specific recommendations. Both of these Appendices C (current summary) and D (more detail, previously) provide concrete, more detailed feedback, explanation, and recommendations on a section-by-section basis of the "Giftedness" pages of Section D of the Special Education Plan.

On behalf of ABC, I would be very happy to provide more information, explanation, and / or engage in dialogue and / or collaborative exploration of reasonable and feasible better education solutions with anyone at any time, about these concerns, recommendations, and any other issues.

(2) **Overview**

There are decades of overwhelmingly conclusive peer-reviewed research, and significant, consistent, confirming feedback from parents, students, and educators, that placement in a congregated gifted class is the best and even necessary placement for education of many or most gifted students. Although it is important, desirable, and a system goal to have teachers who are interested in and capable of suitably teaching a gifted class, the most important requirement is to place gifted students in large cohorts of like-minded gifted peers, in environments in which they have a more suitable breadth, depth, and pace in class, and also have access to a broad range of extra-curricular challenges and activities, to fill gaps that classes alone cannot provide. As students age, larger school cohorts, with multiple full classes of gifted students in each grade across multiple subject areas, become an increasing necessity in order to support expanding and diverging student interests, career paths, areas of academic and extra-curricular concentration, and social and emotional development.

Notwithstanding conclusive research and overwhelming parent and student feedback, there seems to be a lack of information, a trend of misinformation, and / or even bias among some staff about what supports are necessary to provide even minimally appropriate or relevant education for gifted students. This is to be expected in some respects, since special education is a minimal component of teachers' education, and education of gifted students is either not taught or receives only a very brief passing mention. In the absence of education about research on this topic and best practices, some myths and misconceptions seem to have arisen. Some of these 'Myths and Misconceptions' are touched on in Appendix B: Some Myths and Misconceptions below, and are contrasted with what research and overwhelming parent and student feedback

consistently conclude. It is necessary to address myths and misconceptions, as a precursor and foundation to providing guidelines for pedagogically sound and appropriate education of all students, and in this case, gifted students.

(3) **Summary of Reasons for Concerns**

In this environment, over the last handful of years, TDSB has implemented some: (A) overt changes to the SEP; and (B) covert changes to many practices, all specifically designed to and having the effect of shrinking the size, effectiveness of, and access to the gifted program.

This is troubling and inappropriate in several respects, including that:

- It contravenes settled research and very strong parent, student, and teacher experience and feedback.
- None of these changes were implemented with prior notice to or consultation with gifted advocates or parents of gifted students.
- Education of gifted students in gifted classrooms has no or virtually no different or additional costs as compared with education of these students in a regular classroom. Therefore, 'cost' is not a justification for these changes or attempts to cut or reduce the program.
- In that neither research, parent / student choice, nor system cost are a reason to reduce gifted education, it appears that staff who push for this result are misinformed or perhaps even somewhat biased about this.
- Additionally, educating full class cohorts of gifted students together is a much more streamlined, efficient, and feasible option and expectation for teachers, instead of attempting to require every regular teacher to construct and deliver largely ineffective and unachievable individual gifted 'differentiation' in each regular classroom, every year.
- Lack of access to good Gifted ISPs is most harmful to disadvantaged students, due to their personal / family circumstances, and / or due to their additional learning challenges (i.e., LDs, ELLs, 2e students, ADHD, 'students who don't live in the right neighbourhood', etc.). Disadvantaged students such as these are most dependent on public education to meet their educational (academic, social, and emotional) needs, and to achieve their potential. However, ALL students, regardless of background or individual profiles, have a right to expect that public education will meet

their educational (academic, social, and emotional) needs. The public education system, and especially a board of this size, diversity, resources and efficiencies from economies of scale, needs to and can deliver this for all students.

- Failure to provide access for all students to good Gifted ISPs contravenes the foundational Purpose of Education, as stated at the very beginning of the Education Act: "*The purpose of education is to provide students with the opportunity to realize their potential*" (*Ontario Education Act*, R.S.O. 1990, c. E.2, s. 0.1(2)).

(4) **Summary of Changes to Gifted ISPs**

The **net effects** of changes and cuts to Gifted ISPs (summarized here and detailed further in the attached Appendices) are negative and contrary to public education mandates in that:

- A significant population of special education students will systemically not have their educational needs met.
- Students from higher socio-economic circumstances have the option to leave deficient public school programs to be better educated in private schools, or to obtain outside private educational and extra-curricular enrichments, whereas less advantaged students and students with multiple learning needs may not.
- More 'portable' (typically neurotypical) gifted students may move to other specialty programs (i.e., STEM, arts, French, athletics, etc.) which are usually only a partial substitute for specific full-curriculum gifted education, and which also reduces opportunities for non-identified students to participate in these over-subscribed programs.
- 2e gifted students will have fewer options and smaller cohorts of gifted (neurotypical and 2e) peers, which is pedagogically limiting. This also deprives 2e students of a significant, necessary peer group and larger, inclusive ISP neurotypical gifted environment that tends to be more empathetic, tolerant, and socially and academically supportive of 2e students' extra challenges. And,
- Additional challenges are created for already over-burdened regular class teachers (who already cannot meet the full range of student needs), and for classmates who can be distracted by bored, misbehaving gifted students, or disoriented by the different learning speeds and strategies common among gifted students.

(4A) **Summary of Some Overt Changes to the SEP**

In summary, some of the overt changes to the SEP and system practices have included:

- Raising or maintaining very high thresholds for identification, so that fewer students can access the gifted program, and in particular affecting LD, 2e, ELL, 'lop-sided', and disadvantaged students.
- Inserting extra, unnecessary hurdles and barriers to identification, again reducing access, and in particular affecting LD, 2e, ELL, 'lop-sided', and disadvantaged students.
- Arbitrarily shrinking minimum gifted course selection offerings for secondary students.
- Arbitrarily shrinking program sizes, especially of well-functioning, successful programs. (See section: "If it ain't broke, don't "fix" it!", below.)
- Re-districting boundaries to significantly and arbitrarily reduce the number of students who can access good programs.
- Not providing access to waitlists or 'optional attendance' types of processes, which are available to all 'regular' students, and are an easy and efficient mechanism to provide access for all students to their best possible education and supports.
- Inserting arbitrary rules that are barriers to entry, (for example, 'only one placement will be offered, take it or leave it'), while simultaneously offering placements that are predictably unlikely to be accepted, due to excessive commuting distance, program paucity ("programs in name only"), locations in severely 'under-utilized' schools, and / or lack of fit with family or personal circumstances, etc.
- Re-districting boundaries, shrinking good program sizes, only providing a single (sometimes unpalatable) placement offer, and not allowing waitlists and 'optional attendance' types of processes, are designed to reduce access to a necessary program. This is a disservice to supporting all students, including those left in smaller, less viable cohorts, but in particular predictably excludes students 'who don't live in the right neighbourhood'.
- Etc.

(4B) **Summary of Less Visible Changes to Gifted Education Practices**

In addition, however, some parents report that sometimes they feel that there is misinformation or a lack of support for the gifted program, which concerns them. This includes:

- pressuring advice to parents to not seek or accept gifted placements, and
- delays for some students in assessments, identification, and placement
    - too late in the school year for students to reasonably consider and accept the gifted placement; or
    - well beyond known deadlines for students to accept competing placements in other programs and schools; or
    - after the start of the next school year when, predictably, many students won't undertake that level of disruption; etc.

To the extent that these delays are a result of inadvertent system backlog, the system's processes should be revised to avoid these delays, which are very stressful and concerning to all involved. Also, a perceived lack of support for the gifted program is inconsistent with settled research and parents' and students' prolific feedback on their experience in gifted ISPs and in regular classrooms. This could be addressed by providing staff with better information, tools, and coaching, and focusing on more supportive communication to and from staff.

(5) **"If It Ain't Broke, Don't Fix It!"**

All of these changes and others are surprising and concerning, and seem inexplicable, particularly in view of the accepted adage "If it ain't broke, don't fix it!". Gifted ISPs are extensively research-based and have been widely accepted as the easiest and most efficient method of delivering necessary and effective education to gifted students.

In contrast, these recent changes have the effect of reducing the nature, scope, size, effectiveness, and accessibility of Gifted ISPs. This raises questions among parents about what motivates these changes, since both research and extensive parent and student feedback do not support these reductions and changes.

(6) Equity

Failure to support accessible, properly taught Gifted ISPs with sufficiently large, congregated cohorts is sometimes justified with a misinterpreted label of "Equity". However:

- **"Equity" means that ALL students must be provided with their legislated opportunity to achieve *their* potential.**
    - "Equity" does NOT mean "everyone should be treated the same" (i.e., put in the same general classroom), since it is fundamentally inequitable to treat students with very different needs and profiles the same (e.g., LDs, MID, ASD, ADHD, Giftedness, neurotypical development, etc.). In order for very different students (among exceptionalities and within exceptionalities) to achieve their potential, they need different environments and / or supports. What may be beneficial for some students will be ineffective or detrimental for others, and vice versa.
    - This was the driving purpose, context, and conclusion of Motion #7: Inclusion = "Not for Everyone" + "One Size Doesn't Fit All" passed by SEAC in December 2017. (Motion #7 was discussed and reproduced elsewhere in this feedback).
    - "Equity" also does NOT mean that "everyone has to have the same outcome," since that is impossible to achieve. "Equity" misinterpreted as seeking 'same outcomes' also:
        - Contradicts the legislated "Purpose of Education," which is to allow each child to achieve their unique potential.
        - Invalidates different personal goals, aspirations, and educational "Pathways", which is a fundamental underpinning of our education system, i.e., each student can independently choose to become a tradesperson, artist, hair stylist, business owner, physician, IT specialist, teacher, rocket scientist, etc. And,
        - Discriminates against or deprives some students of a good education and doesn't do anything to advance the prospects of those who are presently not sufficiently supported.

(7) **Summary of Recommendations**

In addition to recommendations about specific changes to the SEP noted in Appendix C: Recommended Changes to 2020 SEP – Gifted Education attached, it is recommended that:

a) Gifted identification thresholds be returned to previous levels for 'lop-sided' students and be more flexible for LD and ELL students – all of whom have needed to receive and continue to need to receive education of a type and at a level that better matches their abilities, learning needs, and potential.

b) Gifted screening and assessment tools (which are known to miss identifying some gifted students) be used (as they are designed to be used) to more broadly capture students who might not otherwise be identified, rather than as barriers to exclude students from further consideration.

c) Processing calendar:

1. The vast majority of Gifted assessments, identification, and placement offers should occur earlier in each school year, i.e., be completed by February, so that staffing and class allocations can be more realistically set to accommodate all students at more viable locations.

2. Late placement offers put strain on students, families, staff, planning, and schools, when offers and enrollment occur after schools have already planned staffing levels and course offerings and schedules.

3. Late placement processes also result in offers to more distant / not viable locations (when a closer location has 'reached capacity').

4. For this and other reasons, late placement offers are predictably less likely to be accepted, and reduce the opportunity for families to make real, unfettered decisions about their children's education.

d) Management discretion: For all special education students, all staff participants conduct SSTs, ISTs, IPRCs, and placement decisions with flexibility and with a focus on the best interests of each child. (Exercising

management discretion to approve exceptions from literal interpretations of general policies is a suitable and appropriate use of the experience and expertise of staff in these meetings.)

e) Program boundaries be reset, and some 'gifted in name only' programs be closed, i.e., programs that are called 'gifted programs' but have insufficient students, gifted classes / courses, and / or other offerings (cohort size, extra-curriculars, etc.) to support or retain a viable gifted cohort and sufficient educational program.

f) Students be given flexibility to cross geographic boundaries to better meet their needs (or to remain with previous peer cohorts, etc.), if they are willing to travel to do so. (TDSB should not block access to a program if the student meets the identification criteria, 'does not live in the right neighbourhood', and is willing to literally 'go the distance' to access the program.)

g) Program sizes and attendance boundaries be expanded to realistically accommodate all students who wish to attend that location.

h) Time be given for start-up programs to demonstrate (and obtain a reputation for) being able to provide gifted education that is not a 'program in name only'. However, while doing so, parents / students in that boundary area must also be given real choice about whether they will attend that closer location, or whether they're willing to commute to a farther location that they feel better meets their student's needs, aspirations, and / or family / carpool needs, previous peer group connections, etc. Refusal to provide this option is viewed by parents as an 'offer in name only', when it seems likely the single offer to a deficient placement will not be accepted (and is not accepted) by many or most students.

i) 'Best practices' gifted pedagogy, classroom tips and examples, and mentoring opportunities be shared online and in person among staff who teach and work with gifted students.

j) Similarly, 'best practices' pedagogy, classroom tips and examples, and mentoring opportunities continue to be shared and opportunities continue to be expanded online and in person among staff who teach and work with all types of special education students.

k) Support for staff: In particular, staff at start-up (newly established) and 'under-utilized' gifted program locations be coached and mentored by, and / or partnered with more experienced gifted educators from other locations. Also, for staff to obtain or retain gifted class placements, they should be recognized for demonstrably accessing and implementing the 'best practices' and classroom tips and examples referred to immediately above in recommendations "i" and "j".

l) A robust 'drop down IEP selection menu' of full text Gifted IEP options (and other exceptionalities' IEP options) be offered and made easily available to all staff and to all parents for all-around more effective, more efficient, and less stressful IEP formulation, support, and processing.

m) Adopt more streamlined, 'either or', fewer hurdles, gifted identification pathways to reduce staff workload and to improve identification practices, access, and inclusivity.

n) Eliminate delays and lack of professional resources in a number of ways by re-thinking and streamlining processes, including:

    1. eliminating unnecessary assessments,
    2. increasing staffing levels for needed assessments,
    3. starting and concluding predictable and consistent assessment, identification, and placement processes earlier each school year,
    4. which would also eliminate unnecessary staff work, stress, and involvement (e.g., to respond to or 'manage' predictable parent complaints about delays; and then to scramble in the late spring to catch up with continually changing enrollment numbers to re-determine class sizes, staffing needs, etc.),
    5. reduce staff burdens for excessive gifted screening barriers, by reducing the use of multiple stage, elimination assessments,
    6. reduce staff burdens by eliminating or reducing reassessment of incoming students identified as gifted by other school boards,

7. reduce staff to support 'rubber stamp' functions (e.g., eliminate requirement for 'central staff review' of a change in placement status (this is unnecessary for gifted student placements and is viewed as another unnecessary barrier to entry); e.g., perhaps consider whether in-person full group staff attendance is needed for more straightforward student recommendations, etc.).

o) Acceleration policy: Implement a multi-faceted Acceleration policy, for subject area and full grade acceleration. Several meta-studies evaluating full grade and multiple other types of acceleration have all concluded that acceleration strategies, including full grade acceleration especially in the early years, are absolutely beneficial for suitable students.

   Despite overwhelming research and experiential reports showing significant benefits and no downsides, TDSB has previously refused to consider or implement an acceleration policy, or even to implement full grade acceleration requests on an exception basis. In the past, there have even been attempts to hold back incoming, previously accelerated students, even regardless of their (exemplary) grades and report card documented maturity levels! Acceleration is a long proven, research validated, beneficial strategy for some students, that costs nothing and should be implemented as another helpful, available tool in TDSB's education toolkit.

p) Primary Gifted education: Implement organized Gifted programming or a Gifted program and/or a substantially 'differentiated', congregated, "Enriched" program for gifted students in kindergarten through grade 3. Many gifted students have clearly demonstrated exceptional abilities and potential, including reading, reasoning, calculating, etc., at levels multiple grades ahead of their chronological age peers, well before entering school, and continuing in K through grade 3.

   Currently gifted students have no programming or education at their level for their first five years of public school. By the time they might finally be moved into a gifted program in grade 4 (their sixth year in school), many have disengaged, checked out, withered, misbehaved, been ostracized / silenced / and or bullied and / or have developed negative attitudes about school and its relevance, all of which can persist and have significant long term negative academic, social, and emotional impacts.

q) High School Gifted education:

Previously the SEP required that students in gifted programs take (and schools offer) a *minimum* of 4-4-2-2 courses at the gifted level in each of grades 9 through 12 respectively, although programs typically offered (and very many students enrolled in) a full array of courses at the gifted level every year across all grades. Recently there was an attempt (again without prior notice or consultation with staff, parents, advocates, or students) to change this to a *maximum* of 4-4-2-2 gifted level credits, which was met with such significant opposition that the term 'maximum' was dropped. The net effect however is that in some gifted ISPs in grades 11 and 12 only English and Math are offered at the gifted level, which is inadequate for students who: (a) still learn differently from their peers and need more academic challenge; and / or (b) are often already self-selecting into (i) full language arts / humanities or (ii) math / tri-science, etc. concentrations in preparation for specialized post-secondary programs. Offering only one course at the gifted level in either category – (i) English, and (ii) Math – is insufficient for either type (i) or (ii) specialists, and is insufficient for all students' general gifted education.

Offering a limited selection of only 12 fixed courses, out of an array of hundreds of possible courses and when at least 30 courses must be taken in high school is insufficient for gifted students, who are not gifted just '40%' of the time, and then only within very limited course selection parameters. This is an additional reason supporting the original design of and current recommendation to return to the previous more effective model of identifying and placing large cohorts of high school students in large congregated gifted sites, in order to be able to offer and fill many more gifted level high school courses. This easily and efficiently (and at no additional cost) improves education and makes these sites more viable and self-sustaining.

(8) **Conclusion**

The single, main, necessary system 'intervention' for gifted students is minimal: it is to initially properly identify the full range of gifted students and in a timely manner offer them placement in a sufficiently large ISP cohort and enriched environment that will meet their developmental needs and that they can access and continue to access. After that (unlike students with other exceptionalities), most gifted students need only minimal maintenance and follow up.

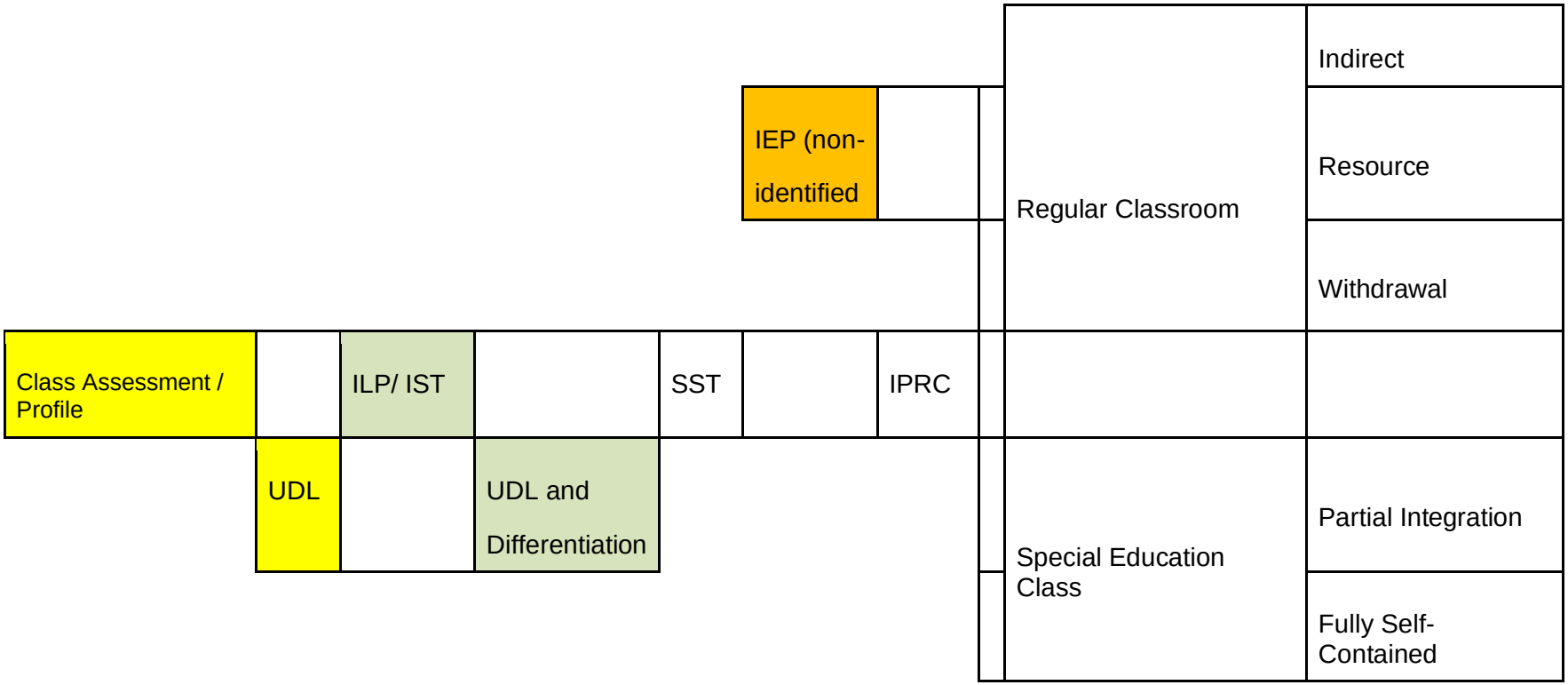
A focus on facilitating and streamlining initial placement in sufficiently large, diverse, accessible cohorts is the best pedagogy, is most efficient, and prevents and eliminates a lot of ongoing and later system stress, work, and negative student issues. We

recommend that this general perspective be applied to the other specific recommendations listed above and in Appendices C and D.

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Appendices

Appendix A: Special Education Plan Feedback by Diane Montgomery



	Current Content in Special Education Plan	Concern /Issues	Recommended Revisions
Assessment and Referral Process (pg. 19, section C)	The flow diagram outlining the referral process includes only the steps class assessment, IST, SST, IPRC, and placement decisions.	This flow chart does not consider the steps teachers need to take before even starting the IST (Tier 1) in order to try to assist most students in tier 1. This should include a class profile (in addition to assessment), ILP and UDL / differentiated instruction and discussions on equity, anti-oppression, anti-racism and inclusion.	Include new bullets with the addition of Class profile, ILP, UDL, differentiation (a description of each is outlined in the rest of this chart).
Class Assessment (pg. 19-section C)	Teachers regularly assess and evaluate the progress of their students. If a student is experiencing difficulty in school (e.g., academic, social, behavioural), teachers will review previous and current assessment and evaluation information, communicate with parents/guardians and gather other information around the learning profile of the student. If challenges persist, the student may be referred to an In-School Support Team (IST).	After a teacher completes class assessments, they should be tracking this information on either a class profile or a version of one as per guidelines in **Learning for All** guide by the Ontario Ministry of Education. http://www.edu.gov.on.ca/eng/general/elemsec/speced/learningforall2013.pdf (pg. 34-38)	TDSB to consider implementing automated class profiles that are easily accessible to all teachers, so teachers don't have to invent their own or maintain cumbersome manual reporting. Recommended revision to text: If challenges persist, the teacher will develop an ILP to track universal classroom strategies that were applied and collaborate with In-School Support Team (IST) to identify more focused UDL or differentiated strategies.

ILP (pg. 21-section C)	When students have persistent learning challenges, the need for more and different kinds of instructional support is considered. Teachers are expected to collect, maintain and use assessment information to guide programming decisions and identify learning needs. For students who are experiencing difficulties in school the information is recorded in an Individual Learning Profile (ILP). The ILP enables teachers to compile a more detailed and specific collection of information about the student's current abilities, strengths and needs based on the learning conditions provided by the teacher. ..... the teacher(s) will revisit the learning conditions in their classroom, ensure they are creating learning opportunities that are culturally relevant and responsive and provide instruction that is personalized, targeting the critical skills that the student requires. A copy of the current ILP is included in SEP in appendix F	ILPs are supposed to guide teachers to identify instructional strategies to meet the needs of the individual student within culturally relevant and responsive learning environments. The current ILP does not specify any processes to guide teachers to recommend instructions following UDL principles and differentiated instruction or include conversations around equity, anti-oppression, anti-racism and inclusion	Revise section F of current ILP to indicate that "Instructional, Environmental and Assessment" strategies should align with UDL principles and differentiated instruction. Add a section on the ILP to confirm discussions on equity, anti-oppression, anti-racism and inclusion by including questions: Who is the student being considered and why? What UDL or differentiated instruction has been provided in the classroom? What support can the teacher be offered to better assist in programming?

IST (pg. 22, section C)	Team members review the ILP and collaborate to develop an action plan of intervention strategies to support both the teacher with appropriate program planning that is reflective of the student's identity, voice and lived experiences, and to coordinate efforts among all staff that interact with the student.	No changes needed to this part of the process except the description should be clear.	
SST (pg. 22, section C)	Most student needs can be addressed by the IST. When the teacher has implemented learning conditions, CRRP strategies and resources recommended by the IST to address the student's needs and the IST subsequently determines if more support is required, the student should be referred to the SST. All students must be reviewed at an IST prior to a referral to an SST. Referral to the SST serves a dual support: • Teachers will share an overview of the learning conditions in the classroom that have been implemented in order to meet the specific needs of the student.	This highlights the importance of ensuring UDL, differentiated instruction and anti-oppressive, anti-racist, equitable and inclusive discussions are occurring prior to development of IEP.	It is the quality and follow-up of the process that is necessary in the stages from classroom assessment to referral to IPRC that ensures student who have an IEP will receive one and that teachers are appropriately addressing the needs of all students without an IEP.

	• Share specific student data based on the teacher's examples of Differentiated Instruction and UDL, and equally important, this will allow the teacher to share the anti-oppressive, anti-racist, equitable and inclusive pedagogy being used to support the student.		
IEP (pg. 24, section C)	An IEP is developed when the principal, in consultation with members of the In-School Team (IST) or School Support Team (SST) determines that a student, who has not been formally identified as exceptional: • regularly requires accommodations for instructional or assessment purposes, and/or • will be assessed on the basis of modified and/or alternative expectations TDSB position is that students who are not exceptional are entitled to receive	There is no specification throughout the referral process of how long the periods are before students can be referred to the next stage I think this is important so parents can see what steps are being taken or they will want an IEP right away. Timelines will also ensure teachers are accountable to implementing appropriate UDL and differentiated strategies.	It is also important that parents can see what is happening at each stage of the process and how long each stage occurs before moving to the next stage. The placement of IEP for non-identified students should be placed above the flow chart and link into the regular classroom resource support so we know what type of support is offered to those students.

	Resource support for one reporting period without the development of an IEP. If the recommendation of the In-School Team (IST) or School Support Team (SST) is for continued support beyond that, then an IEP must be developed. On the flow chart, IEPs for non-identified students are placed between SST and IPRC.		

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Appendix AA: Special Education Plan Feedback by Diane Montgomery (accessible version)

Assessment and Referral Process (pg. 19, section C)

Current Content in Special Education Plan

The flow diagram outlining the referral process includes only the steps class assessment, IST, SST, IPRC, and placement decisions.

Concern /Issues

This flow chart does not consider the steps teachers need to take before even starting the IST (Tier 1) in order to try to assist most students in tier 1. This should include a class profile (in addition to assessment), ILP and UDL / differentiated instruction and discussions on equity, anti-oppression, anti-racism and inclusion.

Recommended Revisions

Include new bullets with the addition of Class profile, ILP, UDL, differentiation (a description of each is outlined in the rest of this chart).

Class Assessment (pg. 19, section C)

Current Content in Special Education Plan

Teachers regularly assess and evaluate the progress of their students. If a student is experiencing difficulty in school (e.g., academic, social, behavioural), teachers will review previous and current assessment and evaluation information, communicate with parents/guardians and gather other information around the learning profile of the student. If challenges persist, the student may be referred to an In-School Support Team (IST).

Concern /Issues

After a teacher completes class assessments, they should be tracking this information on either a class profile or a version of one as per guidelines in **Learning for All** guide by the Ontario Ministry of Education.

http://www.edu.gov.on.ca/eng/general/elemsec/speced/learningforall2013.pdf (pg. 34-38)

Recommended Revisions

TDSB to consider implementing automated class profiles that are easily accessible to all teachers, so teachers don't have to invent their own or maintain cumbersome manual reporting.

Recommended revision to text:

If challenges persist, the teacher will develop an ILP to track universal classroom strategies that were applied and collaborate with In-School Support Team (IST) to identify more focused UDL or differentiated strategies.

ILP (pg. 21, section C)

Current Content in Special Education Plan

When students have persistent learning challenges, the need for more and different kinds of instructional support is considered. Teachers are expected to collect, maintain and use assessment information to guide programming decisions and identify learning needs. For students who are experiencing difficulties in school the information is recorded in an Individual Learning Profile (ILP). The ILP enables teachers to compile a more detailed and specific collection of information about the student's current abilities, strengths and needs based on the learning conditions provided by the teacher. ... the teacher(s) will revisit the learning conditions in their classroom, ensure they are creating learning opportunities that are culturally relevant and responsive and provide instruction that is personalized, targeting the critical skills that the student requires.

A copy of the current ILP is included in SEP in Appendix F

Concern /Issues

ILPs are supposed to guide teachers to identify instructional strategies to meet the needs of the individual student within culturally relevant and responsive learning environments.

The current ILP does not specify any processes to guide teachers to recommend instructions following UDL principles and differentiated instruction or include conversations around equity, anti-oppression, anti-racism and inclusion.

Recommended Revisions

Revise section F of current ILP to indicate that "Instructional, Environmental and Assessment" strategies should align with UDL principles and differentiated instruction.

Add a section on the ILP to confirm discussions on equity, anti-oppression, anti-racism and inclusion by including questions:

Who is the student being considered and why? What UDL or differentiated instruction has been provided in the classroom? What support can the teacher be offered to better assist in programming?

IST (pg. 22, section C)

Current Content in Special Education Plan

Team members review the ILP and collaborate to develop an action plan of intervention strategies to support both the teacher with appropriate program planning that is reflective of the student's identity, voice and lived experiences, and to coordinate efforts among all staff that interact with the student.

Concern /Issues

No changes needed to this part of the process except the description should be clear.

SST (pg. 22, section C)

Current Content in Special Education Plan

Most student needs can be addressed by the IST. When the teacher has implemented learning conditions, CRRP strategies and resources recommended by the IST to address the student's needs and the IST subsequently determines if more support is required, the student should be referred to the SST. All students must be reviewed at an IST prior to a referral to an SST.

Referral to the SST serves a dual support:

• Teachers will share an overview of the learning conditions in the classroom that have been implemented in order to meet the specific needs of the student.

• Share specific student data based on the teacher's examples of Differentiated Instruction and UDL, and equally important, this will allow the teacher to share the anti-oppressive, anti-racist, equitable and inclusive pedagogy being used to support the student.

Concern /Issues

This highlights the importance of ensuring UDL, differentiated instruction and anti-oppressive, anti-racist, equitable and inclusive discussions are occurring prior to development of IEP.

Recommended Revisions

It is the quality and follow-up of the process that is necessary in the stages from classroom assessment to referral to IPRC that ensures student who have an IEP will receive one and that teachers are appropriately addressing the needs of all students without an IEP.

IEP (pg. 24, section C)

Current Content in Special Education Plan

An IEP is developed when the principal, in consultation with members of the In-School Team (IST) or School Support Team (SST) determines that a student, who has not been formally identified as exceptional:

• regularly requires accommodations for instructional or assessment purposes, and/or

• will be assessed on the basis of modified and/or alternative expectations

TDSB position is that students who are not exceptional are entitled to receive Resource support for one reporting period without the development of an IEP. If the recommendation of the In-School Team (IST) or School Support Team (SST) is for continued support beyond that, then an IEP must be developed.

On the flow chart, IEPs for non-identified students are placed between SST and IPRC.

Concern /Issues

There is no specification throughout the referral process of how long the periods are before students can be referred to the next stage I think this is important so parents can see what steps are being taken or they will want an IEP right away. Timelines will also ensure teachers are accountable to implementing appropriate UDL and differentiated strategies.

Recommended Revisions

It is also important that parents can see what is happening at each stage of the process and how long each stage occurs before moving to the next stage.

The placement of IEP for non-identified students should be placed above the flow chart and link into the regular classroom resource support so we know what type of support is offered to those students.

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Appendix B: Some Myths and Misconceptions about Gifted Education: Melissa Rosen

Some Myths and Misconceptions about Gifted Education

1) All gifted students will be fine, no matter what, and regardless of where they are placed. - False.

Gifted students may already be or are capable of reading, reasoning, computing, and learning in multiple ways several grades ahead of their chronological age, and they may also have social and emotional development at grade level or a number of grades ahead. These advanced cognitive and sometimes also advanced social abilities can feel isolating or misunderstood; can be a source of greater perceptiveness, sensitivity, or even anxiety in unsupportive environments; and / or can be the source of bullying, resentment, or lack of acceptance or understanding by peers and even by some teachers.

Gifted students typically master new concepts with minimal repetition and often learn with qualitatively very different approaches from the norm. They not only need (and should expect) to be academically educated and challenged at school (as should all students), but they also need a normal-sized, sufficiently large group of like-minded and like ability student peers to relate to and connect with academically, socially, and emotionally.

Gifted students in regular classrooms are typically academically unchallenged, and coast, disengage, and / or misbehave in response. They often feel that they need to self-censor and hide their abilities, in order to avoid resentment or bullying, or to try to make social connections with students who may be at significantly different developmental levels. They don't have the opportunity to develop study skills and resiliency from learning to stretch, try hard, and 'try harder', which can lead to disastrous academic, social, emotional, and even physical 'crash and burn' situations in later grades and post-secondary drop out, when the level of challenge finally demands more than a minimal 'night before the deadline' effort that previously had generated high marks with little investment.

Social and emotional development among peers and relevant, challenging experiences at school are key to all children's health, including gifted children. However, if you're the only elementary student in your grade who automatically thinks or expresses yourself in complex paragraphs, matrixes, or vocabulary; are reading, retaining, and wanting to communicate about multi-faceted, lengthy tomes; are building sophisticated, multi-dimensional games or structures; and / or know and want to share 1,000 facts about anything

(or everything); and so on, it's very isolating to not have anyone to talk to / listen to what's in your head, or who won't make fun of you, and who 'gets' and can relate to and respond to why and how you think.

Pedagogically, over the last handful of years, there's been a general improvement in understanding that we need to meet a full range of students and their diverse profiles in ways that are more relevant and supportive of their diverse realities, and this applies to gifted students also. While this general perception has improved regarding the need to meet many other diverse special education and challenged learning profiles, there seems to also be an inverse shrinking of support for properly meeting gifted students' needs. The great news is that at a basic, starting level, gifted students can easily, efficiently, effectively, and at no additional cost be reasonably supported by simply lumping them together in reasonably large cohorts, with teachers who 'get' (or are willing to try to 'get') them, and want to support them.

2) "Differentiation" in a regular classroom can sufficiently address gifted students' education. – False.

In general, 'differentiation' is a theoretical, ideal model that in practice is extremely difficult for any teacher to effectively, consistently implement for any type of special learning needs. For gifted students in particular, it's usually almost entirely an ineffective placebo label, beyond the ability or reasonable expectation of a regular classroom teacher to deliver. In any event, differentiation can never provide the very necessary, gifted peer cohort presence that is an integral, necessary part of adequate gifted education.

3) '2e' students (those who are gifted and have one or more additional exceptional learning needs – e.g., LD, ASD, ADHD, etc.) should be placed in a regular class and address their 'other' needs first. – False.

Research and experience say that often it's more effective and less stressful to place the 2e student in a (mostly neurotypical) gifted class so at least one aspect of their learning frustration is automatically addressed, among peers who learn in at least some similar ways. Then the other (2e) learning needs can be addressed or accommodated more effectively within that better-fitting environment.

4) 'Zero Sum' philosophy - False.

Some policies and decisions seem based on a premise that the education system is a 'zero sum' closed environment, in which removing a 'positive' (a good program – e.g., French, STEM, arts, gifted, etc.) from some students will somehow miraculously elevate and eliminate a 'negative' for other students not in those programs. This is nonsense of course, but still seems to be the basis of

seeking to eliminate good programs. (The premise that all students want or would benefit from those programs is also nonsense – many students of all profiles don't want and would suffer in an arts / STEM / French / gifted / etc. program – '**one size' definitely doesn't fit all**.) Instead of forcing everyone into a single, generalized, common denominator, the proper solution of course is to raise the bar and maintain, replicate, and expand access to the well-received and beneficial programs, so that more students – those who want access - can have access. (A.k.a. 'expand the pie', don't shrink it).

5) "Equity" means that we need to treat all students the same, in order to achieve a goal of all students having the same (even if universally reduced) outcomes - False.

A related and equally false premise is that if we treat all students the same, that is more 'equitable'. Or 'sameness equity' is more 'fair', and we 'improve' the system if everyone gets an equivalent (albeit ill-fitting) education. What works for or may be beneficial for some students may not work for or may be ineffective or detrimental for other students, and vice versa. There are differences among learning profile categories (e.g., LD, ASD, ADHD, gifted, MID, neurotypical students, etc.), and also differences among different individuals within different learning profile categories.

- "Equity" does not mean "everyone should be treated (or will benefit from being treated) the same".
- "Equity" also does not mean that "everyone has to have the same outcome". (This negates individual interests, aspirations, and Pathways.)
- "**Equity" means that ALL students must be provided with their legislated, equal opportunity to achieve *their* potential.** ("The purpose of education is to provide students with the opportunity to realize their potential …". Ontario Education Act, R.S.O. 1990, c. E.2, s. 0.1(2)).

For more discussion on equity, please see SEAC Feedback: Melissa Rosen (ABC - Association for Bright Children).

6) Some or all gifted students will be automatically fine (and wildly successful in all aspects of life), no matter what, and it's unfair to educate them to possibly 'exceed' other students' performance – False.

This is completely false in all respects. Gifted students and 2e students experience a full range of personal, neurological, social, emotional, and mental health challenges. Some have significant 'crash and burn' consequences (including academic failure,

emotional collapse, mental health issues, and even death by suicide), which tend to manifest in adolescence and post-secondary environments, particularly when the K-12 environment has been ill-fitting and has not supported or met their developmental needs.

This also ignores the board's legislated requirement to educate EVERY student to achieve their potential. The premise of the above misconception, and the associated idea to hold some – any - students back, is an abrogation of fairness and the responsibility to educate every child to the best of their ability.

Job #1, the premier raison d'être and requirement of a board of education, is to educate *all* children, with an array of evidence-proven pedagogical tools to meet very different and diverse learning profiles and developmental needs. It is not up to some students (whether gifted, disadvantaged, LD, ADHD, and / or with mental health challenges, etc.) to largely educate themselves, and / or to 'sit still and shut up' while most others in the class receive an education close to their current level of development.

The goal to do more to provide better supports for ALL students who need them - regardless of learning profiles and personal circumstances – is a goal that we all enthusiastically and passionately support. It is a fact that some teaching and learning environments will work for some or many students some or most of the time, but will not work for all students all the time. Giftedness is typically the most numerous exceptionality in school boards. The good news is that especially in large boards, economies of scale make lumping gifted students together an efficient and achievable model to deliver effective and cost-effective education for these students.

7) <u>TDSB's gifted program is not sufficiently representative of all students; this is somehow the fault of the students or their families; and therefore, the program should be cut or reduced – False.</u>

This blaming of students or the program as a reason to reduce the program itself – instead of improving access to it – is ironic since TDSB fully controls all levers of identification, placement, access, and marketing the program. Parents and advocates have provided feedback for years that TDSB's identification, placement, and access processes would benefit from improvements, and also that many highly educated, fluent English-speaking parents have encountered so many barriers to entry that they wonder how less educated, ELL, LD, etc. parents can navigate the barriers or access the system. More streamlined, inclusive, and less obstructionist practices would improve access to the program for everyone, and reduce unnecessary staff involvement, 'management' issues, and 'regular' classroom stress.

8) "Inclusion": 'All Special Education students, including gifted students, want and will benefit from Inclusion in a regular classroom' – False.

In a policy paper entitled "A Case for Inclusive Education", Gillian Parekh (then a TDSB employee) advocated in favour of "inclusion" of Special Education students in 'regular' classrooms. This policy paper (commissioned by TDSB) was then often cited by TDSB as the justification for including all special education students in regular classrooms. However, Gifted students are mentioned in this ~40-page policy paper only a handful of times, and always with the caveat that the conclusion stated or research mentioned "does not include" or "does not apply to" "Gifted students". As mentioned elsewhere, decades of peer-reviewed actual research conclusively reach the opposite conclusion for gifted students, noting that congregating in full class cohorts (or where numbers are insufficient, in clusters) of gifted students, are much better education settings for gifted students than a regular class for a number of reasons.

Advocates and parents for many other special education ("S.E.") students from all exceptionalities also agree that although inclusion for some S.E. students sometimes may be preferred and be most beneficial for those students, often or at some developmental stages a regular classroom may not be best, and may be a detrimental setting for some S.E. students. This consensus was reflected in SEAC's December 2017 motion (*Motion* #7: Inclusion = "Not for Everyone" + "One Size Doesn't Fit All") referred to above.

9) "One Size Fits All" – False.

A parent offered another way of expressing this:

"My son is gifted, and my daughter has a learning disability. My son wears (and needs) a size 11 shoe, and my daughter needs a size 7 shoe. TDSB (in a misguided goal of 'equity', and / or to streamline their management challenges) wants to force everyone into a median size 9 shoe (regular classroom), but this won't help, and will actually hurt both of my children."

10) "Parents, students, advocates, and others think that placing gifted students in a regular classroom is fine" - False.

In late 2017 during a very narrow and not well-publicized window to provide feedback to TDSB on the proposed EETF recommendations, parents, students, educators, graduates, university professors, and many others gave overwhelming feedback to TDSB, Trustees, the Director, the media, and in social media circles about the necessity of maintaining the gifted program and other aspects of sufficient gifted education. Finally, just before submitting his EETF Report to the Board of Trustees, John Malloy was

required to publicly retract his attempted cancellation of the gifted program. He justified this by saying that TDSB had received overwhelming public feedback that the gifted program was necessary and that 'since TDSB was doing a good job, it shouldn't cancel a good program'. Malloy specifically noted that in the short window of a only handful of weeks for the public to submit feedback on the mostly unpublicized but sweeping EETF recommendations, an extremely record-setting amount (7,000 pieces) of feedback had been received about all the EETF recommendations, and **an astounding 5,000 of those pieces of feedback included very strong and unanimous support for maintaining and enhancing the (then) recent nature, scope, and size of the gifted program**.

11) Parents who have their children assessed privately are improperly not conforming within system constraints, and deserve to be mocked by some staff - False.

Parents obtain private assessments when they don't have faith in the system or don't agree when the system refuses or neglects to adequately educate or assess their children. The only time that staff would hear that a private assessment was obtained is when the private assessment reveals that the child is in fact gifted (or in other words, when the parent's opinion was correct, and the system wasn't working well, or wasn't expected to work well to identify or support that student).

One of the worst aspects of this attitude is the lack of recognition that the system's failure or refusal to identify more gifted students most harms the 'non-privileged' students whose parents don't have the knowledge, organizational persistence, or resources to obtain private assessments. Additionally, it is very disappointing that it has been suggested that private assessments are somehow not valid results of performance. This is not only an unfair accusation that parents behaved fraudulently, but it also irrationally presumes that private psychologists – whose professional licensing and long-term careers depend on maintaining ethical professional standards to maintain their licensing and livelihoods – would for some reason jeopardize all this to 'cheat' on an assessment for a single assessment fee that they earn regardless of the outcome of the assessment.

A more constructive and collaborative perspective on private assessments would be that this is a 'donation in kind' from parents who are willing to undertake the investment (albeit sometimes at significant personal sacrifice), and that these private assessments help to relieve system pressure and backlog, and free up the board's resources for supporting other students.

12) 'Too many students are identified as gifted so TDSB should reduce assessments, identification, and placement of gifted students' – False.

Canada is perceived worldwide as one of the most desirable countries to live in, and Canadian immigration policies favour and want to attract highly educated and over-achieving professionals and academics. For business and cultural reasons, these new immigrants, and many long-time Canadians, move to Toronto in particular for the outstanding employment, business, education, and cultural opportunities Toronto offers. The City of Toronto is very clearly by a very long shot the hub and nation's premier center of academic, business, medical, financial, arts, innovation, research, and other endeavours, which often require and attract academically and intellectually advanced participants. In that there is a significant genetic component to giftedness, we expect (and have previously found) that the incidence of giftedness in Toronto among the offspring of these parents is higher than an otherwise typical national average population. All students, including all gifted students, merit a relevant education and an opportunity to achieve their potential, without artificial suppression, limiting quotas, inappropriate hurdles, or failure to acknowledge Toronto's exceptional opportunities and exceptional population demographics. TDSB previously has had gifted identification rates of about 5% of TDSB's student population. This is not surprising and is to be expected in view of Toronto's unique immigrant and parent employment magnet demographics.

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Appendix C: Recommended Changes to 2020 SEP – Giftedness Section: Melissa Rosen

Recommended Changes to 2020 SEP: Giftedness Section

Recommendations and reasons for these recommended changes to the Giftedness section of the 2020 Special Education Plan are set out below, including page numbers and quotations from the Plan. These recommendations elaborate on the summary of recommendations on Giftedness by ABC in the main document, SEAC Feedback: Giftedness: Melissa Rosen (ABC - Association for Bright Children)

1. Pg. 67 B, para. "4" - states that "The WISC-V is administered when the child was at least of grade three age appropriately placed in and attending grade three."

This language excludes students who are in grade 3 but accelerated a grade ahead of their birth year (which in itself is a strong indicator that the student may be gifted). It has also been used (improperly) to exclude students from gifted identification who prior to grade 3 already have a sufficiently high WISC-V result, obtained in other school boards, or by private assessments when parents have sought information about their child, such as whether other learning or psychological challenges (LDs, ASD, ADHD, etc.) are present, etc.

This rigid language is an unnecessary barrier to identification, that is most likely to arise as an issue with students who have already been identified as gifted or who are predictably very likely gifted. Requiring retesting is unnecessary to assess their giftedness, may be unnecessarily stressful to the child, and is an unjustified waste of the board and / or parents' limited time and resources.

- **It is recommended that this language be softened to be more expansive, realistic, and flexible, to something like: "The WISC-V will typically be administered by TDSB when the child is in grade 3, or in the year before the child is expected to be enrolled in grade 4, or as soon thereafter as an assessment for giftedness seems merited."**

The ending clause above is added to make it clear that students (i.e., late arriving to TDSB, etc.) may still be assessed and identified after grade 3, if they were not assessed earlier.

2. Pg. 67 B, para. 5 - states that: "The WISC-V is the preferred choice for gifted screening. Other intelligence test results and their criteria will only be accepted pending approval by a TDSB Manager of Psychological Services."

Parents have provided feedback that TDSB Psychological Services (and / or some senior TDSB staff) have been rigidly inflexible in recognizing other tests' results, including even the WISC-V FSIQ ("Full Scale IQ"). The WISC FSIQ is the gifted identification standard in some other school boards, and is even described by the WISC board as an equivalent or superior indicator of giftedness, as compared with the WISC GAI. Although the FSIQ is understandably not used by many boards due to its greater breadth and expense, which are typically unnecessary to form a sufficient conclusion about whether the student is gifted and should be educated as such, there are no objectively justifiable grounds to not recognize the WISC FSIQ results if the student has already been assessed with the WISC FSIQ.

Parents have also provided feedback that transfer from gifted programs in other school boards (including from Toronto Catholic DSB and school boards in other jurisdictions) can be a very bureaucratic and unwelcoming experience where gifted identification has previously occurred based on assessments other than the WISC-V GAI. Particularly since the guiding philosophy is to reasonably and inclusively provide appropriate education opportunities to all students, a more flexible and inclusive posture from TDSB / Psychological Services would be appropriate. Easy transfer would help expand the number of students enrolled in TDSB, since many obstructed parents are turned off and decide not to move or to enroll in a private school instead, and a reputation for obstruction tends to spread. It would also reduce unnecessary workload and use of resources by eliminating redundant assessments and extra handling by TDSB staff.

- **It is recommended that TDSB Psychological Services apply and implement a more flexible, inclusive, and streamlined approach to considering and approving other intelligence test results for gifted identification. This would have multiple benefits, including better meeting more students' exceptional learning needs, expanding TDSB's student population, and reducing unnecessary staff rework and complaint management.**

3. Pg. 67 B and 68 A - "IPRC Determination of Giftedness for English Language Learners (ELL)" and "for Students with Learning Disabilities"

This section sets a WISC-V threshold of 98th percentile on the WISC GAI or other Index Scales. ("A score at or above the 98th percentile on the General Ability Index (GAI), Verbal Comprehension Primary Index Scale, Visual-Spatial Primary Index Scale, or Fluid Reasoning Primary Index Scale").

It is helpful that a threshold of 98th percentile is permitted on a single Index instead of only on a full GAI, however this seems quite challenging for ELL and LD students to meet close to the same WISC standards as neurotypical and fully fluent English language students.

ELL and LD students already face additional challenges, including more difficulty in qualifying for achievement-based enrichment programs, and yet they merit and are able to appropriately benefit from the gifted program. Requiring a 98th percentile WISC standard (even if on a single Index) is a very high bar for these students. Some flexibility for suitable or motivated students who are assessed close to that high bar would be more inclusive and provide these students with an opportunity to come closer to achieving their potential.

- **It is therefore recommended that some additional flexibility be considered for gifted identification of suitable or motivated ELL and LD students, such as accepting a slightly lower WISC percentile on the GAI or listed Indexes.**

4. Pg. 67 B - "IPRC Determination of Giftedness for English Language Learners":

Additionally, the criterion that there be ELL support over a minimum of three consecutive reporting periods may be too rigid to support students who (i.e., as a result of their gifted abilities and / or giftedness + pride + hard work) have accelerated through ELL support with less than three consecutive reporting periods of ELL support. This is an example of a situation in which managerial / professional discretion should be permitted in scheduling or holding an IPRC and / or identifying giftedness to determine the most appropriate placement, even if SEP guidelines are not strictly met.

- **As a result, it is recommended that the "PLEASE NOTE:" language be made more flexible, to something like: "To qualify for ELL consideration, there will typically be evidence that …".**

5. Pg. 68 A - “IPRC Determination of Giftedness for Students with Learning Disabilities”:

The requirement of LD identification that a student be functioning academically three to four grades below grade level in order to be identified as having a learning disability seems to be far too much for all students with learning disabilities, in that by definition this means that the student has been noticeably failing for years before LD identification and placement / additional supports will be provided. In short, this definition seems to literally be setting up these students for failure.

In addition, however, for Gifted-LD students, this criterion, combined with the WISC threshold, suggests that few or no students with LDs will have their gifted learning strengths, potential, and challenges properly supported. There are two reasons for this. (1) Some / many Gifted-LD students will struggle with their LD, but valiantly be able to rely on their giftedness to avoid falling three to four grade levels behind, thus leaving them in a ‘no man’s land’ of no academic support for their gifted potential, and insufficient support for their LD challenges. (2) By the time an LD student is three or four grade levels behind, they are probably too academically and emotionally devastated to contemplate a gifted placement, which means they are doubly blocked from achieving their potential. This is very unfortunate since there are many students who are gifted with LDs, and to reach their academic potential (and for emotional, self-esteem, and mental health reasons) they need to have both of these learning needs supported.

- **It is therefore recommended that the standard for determining whether a student qualifies for the lowered ‘Learning Disability (WISC) threshold’ for Gifted identification, be (i) a psychological assessment confirming the existence of a learning disability, and not be (ii) whether the student has met TDSB’s ‘Learning Disability definition threshold’ (of being three to four grades behind grade level). The latter (ii) is far too punitive and will disqualify many or most Gifted-LD students from Gifted Identification and obtaining academic support to achieve their potential.**

6. ‘Lop-sided’ Gifted Students:

There are many students who are extremely gifted in one area, and are very bright although not as gifted in another area. As with other gifted students, a regular classroom typically does not challenge them or meet their needs in the area in which they are very gifted, and may even not meet their needs in other areas. In contrast, when placed in a gifted ISP, their area(s) of exceptional strength are appropriately taught, and they also keep pace appropriately in other areas, especially since most subject learning

consists of overlapping Index areas and abilities. These students are hard to teach well, and they benefit from and are well placed with the experience, pedagogy, and expertise of the gifted program teachers, and a gifted peer cohort.

Historically, meeting the needs of these 'lop-sided' students has always been a strength of the gifted program. All current gifted ISPs contain 'lop-sided' students who were previously identified and placed in gifted ISPs, are succeeding and thriving in the program, and to an outside observer it is indistinguishable which students were originally assessed as 'lop-sided' or not. This previous more accepting criterion (specified and recommended below) also captures more students 'at the edges' and is more inclusive.

The longstanding previous identification criteria for (non-LD or ELL) gifted students was a WISC GAI at or above the 98th percentile, OR WISC GAI of 96th or 97th percentile and at or above the 98th percentile on either the Verbal Comprehension Index or Perceptual Reasoning Index (for WISC-IV) or for WISC V, at or above the 98th percentile on the Verbal Comprehension or Visual Spatial or Fluid Reasoning Index. When this was changed to only a WISC-V GAI at or above the 98th percentile, this predictably excluded many students who are gifted in some areas, and who need, have benefited from, and have indistinguishably succeeded in Gifted ISPs.

- **It is recommended that the longstanding and more inclusive previous identification criteria for (non-LD or ELL) gifted students be reinstated to be a WISC-V GAI at or above the 98th percentile, OR WISC GAI of 96th or 97th percentile and at or above the 98th percentile on the Verbal Comprehension or Visual Spatial or Fluid Reasoning Index.**

7. Pg. 67 B and 68 B – "Universal Screening":

The 2020 SEP has a more flexible and inclusive approach than a few years ago to considering the results of the CCAT-7 and GRS-S screening assessments for giftedness. This is an important fairness, inclusion, and process improvement and is to be commended.

When first implemented, in response to concerns that teacher nomination of WISC candidates would miss some gifted students, these two extra assessments (the CCAT-7 and GRS-S) were provided to try to capture a broader and more complete slate of candidates. Unfortunately, the original approach was to erect a consecutive triple hurdle process in which students were not eligible to attempt to clear the next hurdle unless the previous hurdle's threshold had been exceeded. This was problematic because both the CCAT-7 and the GRS-S are known (and are statistically reported by their creators) to consistently miss identifying some gifted students who on subsequent WISC testing exceeded WISC standards for giftedness (i.e., WISC > 98th percentile). This original triple hurdle process was problematic because the net effect was to continue to exclude and miss identifying many gifted students.

The CCAT-7s are most likely to miss identifying students with LDs, 2e, ELL / new immigrants, profoundly gifted, and students from disadvantaged circumstances. This is unfortunate since these are also the students who may be more likely to be missed by teacher nomination, and who may also most need or benefit from gifted class placement.

The GRS-S also has statistically significant miss rates, and has additional challenges in that high ratings in the six assessment categories (i.e., Leadership, Motivation, Creativity, etc.) in effect tend to be correlated with giftedness, but don't actually assess advanced cognitive ability, as the WISC does. Additionally, most / all teachers, especially in the first few months of assessing a whole new class of grade 3s, can't be expected to have observed or assessed many of the 72 specific areas of questions, for any, let alone all students. Also, although the questionnaire asks 'objective' questions about the student, it really just (more thoroughly) codifies teachers' subjective perceptions of the student, which in effect may just be a more formal method of subjective teacher nominations (which was a challenge to be addressed originally).

It's not that these assessments might not help flag more students; the concern is how the assessments are used. When used in their original TDSB 'triple elimination hurdle' model, their miss rates combined with the shrinking funnel design meant that by definition some gifted students would not be identified. However, these assessments can be helpful when used as additional tools to help capture students who might otherwise be missed. The creator of the GRS has in effect confirmed this in stating that the purpose of the GRS is to help cast a wider net for consideration, but the purpose is not to definitively disqualify students who aren't scored sufficiently high by their teachers.

- **To improve accuracy and to reduce staff workload, it is recommended that an 'either or' type of process be used to identify students who might be gifted. For example, if a student nears or exceeds the threshold on the CCAT-7 or the GRS, then they should be further assessed with a WISC. If the CCAT-7 is the first round of universal screening, then just use the GRS as a possible alternative assessment for students who weren't flagged by the CCAT-7 but for whom the teacher feels there may be potential present (i.e., perhaps student has demonstrated strong creativity, leadership, or motivation, etc. in class).**

- **In summary, it is recommended to adopt / continue more streamlined, 'either or', fewer hurdles, gifted identification pathways to reduce staff workload and to improve identification practices, access, and inclusivity. (m)**

- **Hats off, hearty praise, and very strong admiration to leadership and staff for excellent, creative CCAT-7 initiatives and screening completion during the pandemic!!**

As an additional piece of feedback, it is very much appreciated and TDSB leadership and staff are to be heartily commended for their excellent, creative, and student-focused extra efforts to support students throughout the pandemic, and also specifically for their very flexible, creative, and result-focused approach to completing all CCAT-7 assessments on time for all students, including virtual students. (Thank you very much! ☺)

8. Pg. 69 A - "Placement Description of Regular Class Support (Giftedness Exceptionality) Students who have an exceptionality of Gifted may be offered placement through the IPRC decision to attend the regular class in the student's homeschool. The student will have an opportunity to learn with peers and be provided intentional learning support through the IEP.", and

   Pg. 69 A (first box) – **"Placement – Regular Class Setting** – Giftedness Exceptionality **… Withdrawal … Resource … Indirect Support", … IEPs**, and

   Pg. 69 A (bottom) and 69 B (top):

   Placement Description …. An Individual Education Plan (IEP) is developed in which provision is made for the accommodations required to address the student's learning needs. A plan for some school-based enrichment opportunities can also be developed. Regardless of classroom placement, an annual Review IPRC meeting is held for all identified students and it is crucial that development and careful monitoring of the IEP take place."

Although 'Withdrawal', 'Resource', and 'Indirect Support' options are listed for gifted students in Regular Class placement, we have not received feedback that parents feel that their gifted students receive or that teachers in regular classes demonstrate use of any of these options for supporting gifted education in a regular class.

- **It is therefore recommended that 'best practices' gifted pedagogy, classroom tips and examples, and mentoring opportunities be shared online and in person among staff who teach and work with gifted students, in regular classrooms and in gifted ISPs. (i)**

- **Similarly, it is also recommended that 'best practices' pedagogy, classroom tips and examples, and mentoring opportunities continue to be shared and opportunities continue to be expanded online and in person among staff who teach and work with all types of special education students. (j)**

We have received considerable feedback that at a minimum, parents hope that although it is a high-level document, the existence and content of an IEP might provide some useable guidance and helpful ideas for the over-burdened regular (and ISP) classroom teachers who are trying to support a very challenging and different array of student profiles every year.

For support of extra learning challenges and for support of 2e students' other exceptionalities, IEPs do seem to be very helpful for mentioning accommodations, which are then often well implemented during tests and in much classroom work. However, for gifted students, a consistent area of IEP challenge seems to be on naming and implementing goals, methods, and actions for supporting students' intellectual giftedness and associated advanced learning potential. This is a somewhat less pressing concern for students placed in gifted ISPs, especially with teachers who are experienced in teaching gifted students, in that hopefully the gifted class curriculum and general breadth, depth, and pace of instruction will automatically address and generally support all students' gifted learning needs. However, for gifted students not placed in gifted ISPs, an absence of specificity, goals, suggestions, and individual student's information in IEPs seems to be a much more pervasive and concerning issue for parents and students.

The latter category of 'gifted students not in gifted ISPs' includes students in 'regular' classrooms, and includes students in 'special' programs, such as French Immersion, etc. Parents often place gifted students in French programs (for example), as an attempt to provide extra challenge and broader curriculum, especially for gifted students who are bored and unchallenged in regular classrooms and have no other options in the early years. Although the addition of more French is helpful, it is often not sufficient to address multiple other issues and areas of advanced learning potential. Parents of gifted students in French programs have been told by teachers that 'this is already an 'enriched' environment; IEPs aren't applicable here and should not be sought; if you don't think that learning French is sufficient then leave the French program and move to a gifted program'. This is not proper and would not be acceptable for other learning issues (i.e., LDs, etc.) and is not acceptable for gifted students either.

Parents also often provide feedback that they feel that IEP creation, updates, and use is an uphill battle, especially for students not in gifted ISPs. Feedback from teachers or the substance of conversations with parents often don't make it into the IEP. Also, many parents (and perhaps many classroom teachers) don't know what to put into an IEP to make it helpful, usable, and a time-saving springboard for this year and next year's teachers. This concern is most pronounced among parents of 2e students in ISPs and

regular classrooms, and among parents of students in regular classrooms, in which the 'system' supports of a gifted ISP are not present.

- **It is therefore recommended that a robust 'drop down selection menu' of full text, descriptive Gifted IEP suggestions (and other exceptionalities' IEP suggestions) be offered and made easily available to all staff (in regular classrooms, ISPs, and other staff) and to all parents, for more effective, more efficient, and less stressful IEP formulation, support, and processing for everyone. (I)**

9. Pg. 69 B – "PLEASE NOTE: Once an offer of placement to a Special Education Class for Giftedness has been declined and a student is attending the regular class, a later requested change in level of support from the regular program to a Special Education Class placement must be done through a Central or Learning Centre Review IPRC."

A Central or Learning Centre Review IPRC is an unnecessary escalation for gifted students who seek a change in placement to a Gifted ISP. (Perhaps this process may be (or may not be) more appropriate for students with other exceptionalities in other ISPs?) Gifted students may seek movement to or from an ISP for a plethora of reasons including and in addition to academic issues, such as family issues, transportation logistics, sibling school attendance, peer group misfit, developmental growth spurts, 2e issues / catch up and other challenges, mass school transition years (i.e. into or out of middle school), etc. For gifted students who have already been identified, declined an ISP, tried a regular class, but who then seek a gifted class placement, this escalation is viewed as unnecessary and is viewed as a barrier (albeit perhaps inadvertent) to intimidate families into not moving to a gifted ISP. For gifted students' requests, this also seems to be an unnecessary and wasteful use of senior staff's very valuable time.

- **Therefore, it is recommended that this process escalation be eliminated, and a request for a placement into a gifted ISP be considered and handled in the ordinary course in an ordinary IPRC**.

- **Also, to save valuable staff time (to reallocate to other needed assessments and professional support), for uncomplicated (i.e., not 2e) Gifted IPRC's, perhaps in person attendance by a psychologist at the IPRC may not always be necessary. Instead, perhaps a simple written report could be shared to the effect that "the student's WISC-V psychological assessment exceeded the 98th percentile and therefore this student has met the identification criterion for gifted identification (and there were no other psychological assessments or issues identified)".**

10. Pg. 69 B – "In Secondary Schools":

"**Students in Grade 9 and 10** are required to take *[a minimum of]* four special education courses offered for the intellectually gifted. The recommended *[minimum]* courses for schools to offer are: English, Math, Science, and Geography/History."

"**Students in Grade 11 and 12** are required to take *[a minimum of]* two special education courses for the intellectually gifted. The recommended *[minimum]* courses for schools to offer are: English and Math."

Previously the SEP required that students in gifted programs take (and schools offer) a *minimum* of 4-4-2-2 courses at the gifted level in each of grades 9 through 12 respectively, although programs typically offered (and very many students enrolled in) a full array of courses at the gifted level every year across all grades. Recently there was an attempt (again without prior notice or consultation with staff, parents, advocates, or students) to change this to a *maximum* of 4-4-2-2 gifted level credits, which was met with such significant opposition that the term 'maximum' was dropped. The net effect however is that in some gifted ISPs in grades 11 and 12 only English and Math are offered at the gifted level, which is inadequate for students who: (a) still learn differently from their peers and need more academic challenge; and / or (b) are often already self-selecting into (i) full language arts / humanities or (ii) math / tri-science, etc. concentrations in preparation for specialized post-secondary programs. Offering only one course at the gifted level in either category – (i) English, and (ii) Math – is insufficient for either type (i) or (ii) specialists, and for all students' general gifted education.

Offering a limited selection of only 12 fixed courses, out of an array of hundreds of possible courses and when at least 30 courses must be taken in high school is insufficient for gifted students, who are not gifted just '40%' of the time, and then only within very limited course selection parameters. This is an additional reason supporting the original design of, and current recommendation to return to the previous more effective model of identifying and placing large cohorts of high school students in large congregated gifted sites, in order to be able to offer and fill many more gifted level high school courses. This easily and efficiently (and at no additional cost) improves education and makes these sites more viable and self-sustaining. (q)

- **It is therefore recommended that the above two bolded quotations from the SEP be amended to re-insert the concept of 'minimum', as inserted above in italics and parentheses (i.e.: *[minimum]*).**

11. Pg. 69 B – "In Elementary Schools":

"A program in any given site can reach capacity, which may result in some students being directed to the next closest site location with available program space."

"Only one offer is provided – at the nearest location with available space. There are no waitlists."

➢ **Please see comments and recommendations in next section immediately below.**

12. Pg. 69 B – 70 A – "Secondary School Boundaries for Students with Giftedness Exceptionalities":

"PLEASE NOTE: It is possible that a program in any given site can reach capacity, which may result in some students being directed to another site location with available program space. When placement in a Special Education Class for Giftedness is offered and declined, attendance in the home school continues in the regular program. For more information about student placement in TDSB Secondary programs for Giftedness, see the Q and A posted on the TDSB website. Only one offer is provided – at the location indicated according to the student's home address according to the Secondary School Boundaries for Students with Giftedness Exceptionalities. There are no waitlists."

Gifted ISPs are extensively research-based and have been widely accepted as the easiest and most effective method of delivering necessary education to gifted students. However, over the last handful of years, several changes to the SEP and to practices around Gifted ISPs have been implemented, which have the effect of reducing the nature, scope, size, effectiveness, and accessibility of Gifted ISPs. Some of these changes have included:

- Arbitrarily shrinking program sizes, especially of well-functioning, successful programs.
- Re-districting boundaries to significantly and arbitrarily reduce the number of students who can access good programs.
- Not providing access to waitlists or 'optional attendance' types of processes, which are available to all 'regular' students, and are an easy and efficient mechanism to provide access for all students to their best possible education and supports.
- Inserting arbitrary rules that are barriers to entry. (For example, 'only one placement will be offered, take it or leave it'), while simultaneously offering placements that are predictably unlikely to be accepted, due to excessive commuting distance,

program paucity (“programs in name only”), locations in severely ‘under-utilized’ schools, and / or lack of fit with family or personal circumstances, etc.

Re-districting boundaries, shrinking good program sizes, only providing a single (sometimes unpalatable) placement offer, and not allowing waitlists and ‘optional attendance’ types of processes, have the effect of reducing access to a necessary and helpful program. This is a disservice to supporting all students, including those left in smaller, less viable cohorts, but in particular predictably excludes students ‘who don’t live in the right neighbourhood’.

Therefore, it is recommended that:

- **The vast majority of gifted assessments, identification, and placement offers occur earlier in each school year (i.e., be completed by February) so that annual staffing, course selection, and class allocations that start in March can be more realistically set to accommodate all students at more viable locations. Late placement offers put strain on students, families, staff, planning, and schools, when offers and enrollment occur after schools have already planned staffing levels and course offerings and schedules. Late placement processes also result in offers to more distant / not viable locations (when a closer location has ‘reached capacity’). For this and other reasons, late placement offers are predictably less likely to be accepted, and reduce the opportunity for families to make unfettered decisions about their children’s education. (c)**

- **Program boundaries be reset, and some ‘gifted in name only’ programs be closed. (Programs that are called ‘gifted programs’ but have insufficient students, gifted classes / courses, and / or other offerings (cohort size, extra-curriculars, etc.) to support or retain a viable gifted cohort and sufficient educational program.) (e)**

- **Students be given real flexibility to cross arbitrary geographic boundaries to better meet their needs (or to remain with previous peer cohorts, etc.), if they are willing to travel to do so. (TDSB should not block access to a program if the student meets the identification criteria, ‘does not live in the right neighbourhood’, and is willing to literally ‘go the distance’ to access the program.) (f)**

- **Program sizes and attendance boundaries be expanded to realistically accommodate all students who wish to attend that location. (g)**

- **Time be given for start-up programs to demonstrate (and obtain a reputation for) being able to provide gifted education that is not a 'program in name only'. However, while doing so, parents / students in that boundary area must also be given real choice about whether they'll attend that closer location, or whether they're willing to commute to a further location that they feel better meets student needs, aspirations, and / or family / carpool needs, previous peer group connections, etc. Refusal to provide this option is viewed by parents as an 'offer in name only', when it seems apparent that the single offer to a deficient placement will not be accepted (and is not accepted) by many or most students. (h)**

- **Staff at start-up (newly established) and 'under-utilized' gifted program locations be coached and mentored by, and / or partnered with more experienced gifted educators from other locations. Also, for staff to obtain or retain gifted class placements, they should be recognized for demonstrably accessing and implementing the 'best practices' and classroom tips and examples referred to in a recommendation above. (k)**

ADDITIONAL RECOMMENDATIONS:

The following additional recommendations apply to issues woven through multiple parts of the Special Education Plan:

- **Management discretion: For all special education students, it is recommended that all staff participants conduct SSTs, ISTs, IPRCs, and placement decisions with flexibility and with a focus on the best interests of each child. (Exercising management discretion to approve exceptions from literal interpretations of general policies is a suitable and appropriate use of the experience and expertise of staff in these meetings.) (d)**

- **Eliminate delays and lack of professional resources in a number of ways by re-thinking and streamlining processes, including:**
  - **eliminating unnecessary assessments,**
  - **increasing staffing levels for needed assessments,**
  - **starting and concluding predictable and consistent assessment, identification, and placement processes earlier each school year,**
  - **which would also eliminate unnecessary staff work, stress, and involvement (i.e., to respond to or 'manage' predictable parent complaints about delays; and then to scramble in the late spring to catch up with continually changing enrollment numbers to re-determine class sizes, staffing needs, etc.),**

- **reduce staff burdens for excessive gifted screening barriers, by reducing the use of multiple stage, repetitive / elimination assessments,**
- **reduce staff burdens by eliminating or reducing reassessment of incoming students identified as gifted by other school boards,**
- **reduce staff to support 'rubber stamp' functions (i.e., eliminate requirement for 'central staff review' of a change in placement status (this is unnecessary for gifted student placements, and is viewed as another unnecessary barrier to entry); i.e., perhaps consider whether in-person full group staff attendance is needed for more straightforward student recommendations, etc.). (n)**

- **<u>Acceleration policy:</u> Implement a multi-faceted Acceleration policy, for subject area and full grade acceleration. Several meta-studies evaluating full grade and multiple other types of acceleration have all concluded that acceleration strategies, including full grade acceleration especially in the early years, are absolutely beneficial for suitable students.**

  Despite overwhelming research and experiential reports showing significant benefits and no downsides, TDSB has previously refused to consider or implement an acceleration policy, or even to implement full grade acceleration requests on an exception basis. In the past, there have even been attempts to hold back previously accelerated students, even regardless of their (exemplary) grades and report card documented maturity levels! Acceleration is a long proven, research validated, beneficial strategy for some students, that costs nothing and should be implemented as another helpful, available tool in TDSB's education toolkit. (o)

- **<u>Primary Gifted education:</u> Implement organized Gifted programming or a Gifted program and / or a substantially 'differentiated', congregated, "Enriched" program for gifted students in kindergarten through grade 3. Many gifted students have clearly demonstrated exceptional abilities and potential, including reading, reasoning, calculating, etc. at levels multiple grades ahead of their chronological age peers, well before entering school, and continuing in K through grade 3.**

  Currently gifted students have no programming or education at their level for their first five years of public school. By the time they might finally be moved into a gifted program in grade 4 (their sixth year in school), many have disengaged, checked out, withered, misbehaved, been ostracized / silenced / and or bullied and / or have developed negative attitudes about school and its relevance, all of which can persist and have significant long term negative academic, social, and emotional impacts. (p)

- **<u>The Big Picture</u>: The single, main, necessary system 'intervention' for gifted students is quite minimal: it is to initially properly identify the full range of gifted students and in a timely manner offer them placement in a sufficiently large ISP cohort and enriched environment that they can access and continue to access and that will meet their developmental needs. After that (unlike students with other exceptionalities), minimal maintenance and follow up is typically needed for most gifted students.**

  A focus on facilitating and streamlining initial placement in sufficiently large, diverse, accessible cohorts is the best pedagogy, is most efficient, and prevents and eliminates a lot of ongoing and later system stress, work, and negative student issues. We recommend that this general perspective be applied to the other specific recommendations listed above.

The Proper Use of the GRS

On 5/29/2012 10:11 AM, Barb Cyr wrote:

Dr. Pfeiffer

Attached is a proposal for the ID & placement criteria of gifted students at the Peel DSB in Ontario. The staff who created this model claim to have received your approval.

I think if you look closely at the criteria you will see that the structure of the proposed model defeats the purpose of using the GRS. It will test students in grade 4. Only students who first score at or above the 98th%ile on the Canadian Cognitive abilities test (CCAT) will go on to be assessed using the GRS. Isn't the whole purpose of using the GRS to find students who are missed by tests such as the CCAT?

Students who are at or above the T-score of 60 will go on to be assessed using the WISC IV, only students who test at or above the 98th%ile will be identified as gifted and be offered placement in the contained gifted program.

The GRS will be used to eliminate students rather than find gifted students. Did you really see this ID model and are you really okay with it?

I see this model eliminating LD students, English language learners and gifted students who are no longer motivated to learn, before they even get to the GRS.

The Trustees will vote to implement this model on June 5th, 2012.

The Peel DSB has a student population of over 150,000 students.

Regards,

Barb Cyr
President,
Association for Bright Children of Ontario, Peel Chapter

From: Steven Pfeiffer [mailto:spfeiffer@fsu.edu]
Sent: Tuesday, May 29, 2012 10:22 AM
To: Barb Cyr
Subject: Re: Did you really approve this?

Dear Ms. Cyr:

I have not approved any proposal from your Association or school district. I am not serving as a consultant or adviser to the Ontario schools. And I have not provided any official or unofficial recommendations or advice regarding how Ontario schools might like to proceed in identifying its high ability students.

You are correct in your statement that the GRS was designed: 1) as a first stage screening for gifted and talented identification in the schools and/or 2) to complement other procedures and tests as part of a comprehensive assessment for gifted and talented programs. It was not designed to be used subsequent to or following individual ability testing to further screen or gate students of high ability.

This is my very preliminary response to your query. I have not opened or read the attachments that you so kindly forwarded. As I said above, I am not on retainer or serving as consultant or adviser to the Ontario schools.

Best Wishes,

Dr Steven Pfeiffer

Steven I Pfeiffer, PhD, ABPP
Professor and Director Clinical Training
Florida State University

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Appendix D: Feedback on TDSB 2016 Special Education Plan regarding gifted students: Melissa Rosen

FEEDBACK ON TDSB'S 2016 SPECIAL EDUCATION PLAN REGARDING GIFTED STUDENTS

(A) UNDERSTANDING THE NATURE AND PROFILES OF GIFTED STUDENTS:

In order to be able to deliver effective education for gifted students, it's necessary to understand the diverse profiles, needs, and effective solutions for these students.

For your reference, attached as 'Schedule A', is a fully research-based, footnoted summary of characteristics and needs of Intellectually Gifted students, including a four-and-a-half-page bibliography of research on gifted students, which we hope you will find to be informative and helpful.

Some highlights are summarized here:

Although Intellectual Giftedness is the second most common special education exceptionality in the population, its invisibility, its near absence from basic teacher training and from much generalized special education literature, and its complicated history as a socio-cultural construct, render it one of the most misunderstood and under-identified categories within Special Education.

One of the primary myths about gifted students is that 'they'll all be just fine, no matter what', but this is not true, and appropriate educational support can make a huge difference. In order to promote well-being, ensure equity and optimize outcomes, it's necessary to understand, and deliver educational options cognizant of, individual differences. The education system has a responsibility to overturn myths and stereotypes about giftedness, by providing accurate, evidence-based guidance (Hutcheson & Tieso, 2014).

Historically, the concept of giftedness has often been tainted by an erroneous assumed correlation with elitism and privilege. To ensure equity of access to programming interventions for gifted pupils, sound, evidence-based identification practices are required. It is essential to establish a universal screening process that gives all students, regardless of gender, race, first language, socio-economic status or any other demographic identifier, an equal opportunity to access interventions necessary to develop their full intellectual potential. While giftedness is more than just a number, the selection criteria for students participating in gifted programs should be demonstrable by something more than a referral that is highly susceptible to bias (e.g. Card & Guiliano, 2015; Ford, 2010; Lakin, 2016; Matthews, 2014).

It must also be recognized that each gifted pupil has a unique learning profile. Giftedness may be expressed only in a specific domain or globally. Specific traits may be evident in some individual pupils, but not all. Specific interventions may be effective for some individuals, but not all. Giftedness can occur in combination with other exceptionalities or mental health issues. Some students may exhibit signs of undesirable complications while others are fairly well-adjusted socially and emotionally for the time being. Complications resulting from giftedness often increase the higher the level of intellectual exceptionality that is indicated. If an educator has met one gifted pupil, they have only met one gifted pupil (e.g. Fiedler, 1991; Gross, 1993; Rogers, 2001; Webb et al., 2005).

The educational needs of gifted students cannot be effectively solved by short-term, part time or time limited interventions. For healthy social-emotional development, gifted pupils have an ongoing need to form friendships and engage in teamwork with like-ability peers, who may or may not be of the same chronological age (Gross, 2002; Lovecky, 1995). Gifted pupils' persistent intellectual curiosity and rapid acquisition of concepts, can only be fully satisfied by an accelerated pace of instruction at their zone of proximal development that sufficiently increases the complexity of the curriculum (Kanevsky& Geake, 2004; Rogers, 2001). Research strongly supports the efficacy of many forms of acceleration (for example, as outlined in ABC Ontario's *Position Paper on Acceleration,* attached as 'Schedule B'). Use of a variety of forms of acceleration offers one tool kit of educationally effective, easy-to-implement, no additional cost solutions to address gifted students' needs, particularly in the early years when congregated ISPs for Gifted students are not available. Access to a range of diverse, robust, vibrant congregated ISPs (which are also educationally effective, easy-to-implement, no additional cost solutions) are another very important educational solution to meeting the diverse and complex educational, developmental, social, and emotional needs of gifted students.

The asynchronous development and heightened intensity that are characteristic of some gifted children renders them particularly vulnerable to the impact of an inappropriate educational environment. Meaning that, poor fit between gifted pupils' abilities and their educational programming and placement will not only result in lost opportunity to develop their full potential, but will often also lead to lower levels of personal well-being and higher incidence of behaviour issues. In many cases, these undesirable outcomes might have been avoided, or at least mitigated, by consistent, sufficient and appropriate interventions (e.g. Mendaglio, 2008; Neville et al., 2013; Roedell, 1984; Webb et al, 2005).

However, regardless of differing behavioural profiles, all gifted pupils need continual opportunity to accept challenge and take risks so that they develop the resiliency to overcome obstacles and failures. Coasting through the standard curriculum at their age indicated grade-level may result in excellent marks for some students, but for others it will lead to disengagement, boredom and frustration. In either case, the outcome does not equate to achieving full potential if the pupil could readily perform at one, two or more grade levels higher. In both cases, the pupil is

underachieving relative to their potential and fails to develop the necessary skills and confidence, both academic and psycho-social, to handle future challenges (Christopher & Shewmaker, 2010; Niehart, 2002).

In worse case scenarios, gifted pupils, especially those who fail to receive optimal special education interventions, are particularly vulnerable to a range of negative outcomes that can extend to complex mental health disorders. Gifted pupils are non-neurotypical learners whose inner experiences and awareness are qualitatively different from the norm. Those gifted pupils who have the least resources outside of the public-funded system to identify their exceptionality, provide interventions and address ensuing complications, are the most vulnerable of all. Without equitable access to effective evidence-supported intervention for all gifted pupils in Ontario, the opportunity will be lost to fully develop the unique individual capacity of these students (Ford & Grantham 2003).

(B) DEFINITION OF INTELLECTUAL GIFTEDNESS:

Another view to understanding the diverse profiles and needs of gifted students, is encapsulated in the following definition of Intellectual Giftedness. This was prepared following and entirely based on a comprehensive, thorough, objective review of research and studies about gifted students, and also considered other jurisdictions' definitions of intellectual giftedness.

Definition of Intellectual Giftedness:

Intellectual Giftedness is a quantitatively assessed, advanced intellectual ability, which may be characterized by asynchronous development and heightened intensity, which may increase with higher intellectual capacity. Giftedness is often accompanied by any, or a combination, of the following:

- persistent intellectual curiosity
- rapid acquisition and mastery of concepts
- advanced reasoning and problem solving skills
- exceptional creativity and divergent thinking, or
- potential for advanced achievement in a specific domain or general academic aptitude

and requires continuous interventions beyond those available in a regular school program including:

- modified curriculum that matches the zone of proximal development

- increased complexity
- accelerated pace of instruction
- ongoing interaction with like-ability peers
- specialized supports
- continual opportunity to accept challenges, take risks and learn to overcome obstacles and failures.

Giftedness can occur across all demographics and co-exist with or mask other exceptionalities such as learning disabilities, and communication, attention, behaviour or mental health disorders, as well as physical impairments.

If educational interventions are inadequate, the unique traits of gifted pupils render them particularly vulnerable to developing a range of negative outcomes such as behaviour issues, educational disengagement, underachievement, low self-esteem, social isolation, anxiety, unhealthy perfectionism, eating disorders, obsessive-compulsive disorders, and depression. Therefore, consistent provision of optimal interventions is critical for supporting the well-being of gifted pupils and achievement of their full potential.

(C) FEEDBACK ON SPECIAL EDUCATION PLAN, GIFTEDNESS EXCEPTIONALITY:

We attach below the Special Education Plan subsection on the Giftedness Exceptionality, with our comments inserted.

We would be very happy to provide additional information or clarification, and to respond to any questions regarding our feedback. We also request to be informed of and participate in any working groups or other policy and process initiatives regarding Gifted students and their education.

Giftedness

Ministry Definition

An unusually advanced degree of general intellectual ability that requires differentiated learning

experiences of a depth and breadth beyond those normally provided in the regular school program to satisfy the level of educational potential indicated.

New TDSB "Universal Screening Process" and Identification of Giftedness

Effective September 2016, the TDSB will be introducing a universal screening process for all Grade 3 students across the board. The purpose of this universal screening test is to provide comprehensive information to classroom teachers about the learning strengths and needs of all students and to assist in identification and program planning for students with atypical learning profiles. Another objective in adopting this universal screening process is to make the process of identification for giftedness more comprehensive and equitable.

Under the new **Universal Screening Process**, the pathway for Gifted Identification will include the following steps:

(a) **STEP 1: Universal screening of Grade 3 students through a group test, using the Canadian Cognitive Abilities Test (CCAT 7)**

This test will be administered in September and is used to assist teachers in developing a classroom profile of student functioning to support program planning. Discussion around any required accommodations for students takes place before testing, through the **In-School Team (IST)** process. Parental permission for their child to participate in the screening test is required and collected through a signed **consent form.**

(b) **STEP 2: Administration of the Gifted Rating Scale – School Age Record Form (GRS–S) with students who meet the CCAT 7 criteria for potential Giftedness**

GRS is a teacher measure of academic performance, creativity and motivation. It is supported by a great deal of cross-cultural research and has excellent validity and reliability. It enables staff to capture a broader range of characteristics than can be realized in IQ testing alone.

(1) Questions:

(a) What TDSB and CCAT guidance and instructions are given to teachers and other personnel who administer and interpret the CCAT (please provide copies of or links to all documents).

(b) What TDSB and GRS guidance and instructions are given to teachers and other personnel who administer and interpret the GRS (please provide copies of or links to all documents).

(c) Which students have a GRS assessment?
- (i) All students who are above the designated CCAT threshold?
- (ii) A subset of students who are above the designated CCAT threshold, and if so, how is that subset chosen?
- (iii) Any students who fall below the designated CCAT threshold, and if so, how is that subset chosen?
- (iv) What is the designated CCAT threshold for further evaluation of whether a student is gifted? What guidance is given and what is actually done for further evaluation, if any, if a student tests slightly below the designated CCAT threshold, and what is the recommended range?
- (v) Can students be nominated for GRS evaluation by other teachers?
- (vi) Can students be nominated for GRS evaluation by parents?

(d) Provide numerical data on results (number of students, results) of the first year of the TDSB-administered:
- (i) CCAT,
- (ii) GRS,
- (iii) WISC screening, and
- (iv) gifted designations resulting from this process.
- (v) Please provide total numbers and percentage of all students who have each test administered, listed by categories in (d) above, by gender, and by school district.

(We assume that TDSB has already compiled and analyzed this data.)

(e) Confirm that for students who already have WISC results exceeding the gifted threshold:
- (i) CCAT and GRS assessments will not be administered, and
- (ii) results of CCAT and GRS assessments, if already administered, will not negate a designation of 'gifted' if the WISC threshold has been met.

(2) Discussion + Concerns about CCAT:

(a) The stated purpose of CCAT testing was to have an objective, more equitable, more broad-based method of identifying a range of educational needs, including better identifying Gifted students. (We thoroughly support this goal.)

(b) The actual decision of whether a student is to be designated 'gifted' is dependent on meeting or exceeding the WISC testing threshold (98th percentile).

(c) Although using the CCAT to better identify students who are gifted is hopefully an improvement over the previous method of teacher identification of which students to assess with a WISC, the CCAT will identify some gifted students, but it also has flaws and will not identify a number of other gifted students.

(d) Errors in the accuracy of the CCAT identifying gifted students increase substantially for students above the 90th percentile, and become increasingly less accurate as the student tests higher on a WISC assessment.

In other words (using WISC scores as a measure of intellectual 'giftedness'), the more 'gifted' a student is, the less likely that student is to be identified as gifted by a CCAT screen.

(e) The CCAT is also less likely to identify 'twice exceptional' ("2e") gifted students (namely, students who have a gifted exceptionality as well as some other exceptionality).

(f) Also, in many ways, the CCAT is more of an indicator of 'instructional readiness' than of innate ability. Thus, students from less-enriched home environments may be less likely than other students to be identified as suitable for further evaluation.

(g) Thus, the CCAT often fails to identify as gifted, gifted students who are:
- (a) Highly gifted;
- (b) Twice exceptional (i.e. student is gifted and has another exceptionality); and
- (c) From less-enriched home environments.
- (d) Therefore, although the CCAT may help to identify a subset of students suitable for WISC testing (who previously may not have been identified by only subjective teacher evaluation), there is also a separate subset of gifted students who will not be identified by CCAT (or GRS) screens as suitable for WISC testing.

Discussion + Concerns about GRS:

(e) The GRS consists of a teacher's evaluation of a student on 6 scales. The scales are: Intellectual, Academic, Creativity, Artistic, Leadership, and Motivation. The first five are evaluations of perceived ability; the sixth is less about ability.

(f) Post-implementation analysis of the use of the GRS concludes, among other things, that a high score attained on various scales varies in its ability to predict a high WISC score.

(g) Of the six scales, a high score on the Intellectual scale has the best predictive value of a score exceeding 98th percentile on the WISC.

(h) The Sensitivity ("SE") or 'true positive rate' for the GRS is the proportion of people who will test over 98th percentile on the WISC and who are correctly identified (by attaining a *T* score over 60 on a GRS scale). The SE of the best GRS predictor scale, the GRS Intellectual scale, is only 0.86.

(i) Although gifted students have varying likelihoods of demonstrating observed high ability on these six scales, to varying degrees, some gifted students will not be observed having high performance on any of these scales. In other words, measurements over 60 on any of these scales have some ability to identify students who will test over 98th percentile on the WISC, but will not identify all students who will test over 98th percentile on the WISC.

(j) There is strong concern that the GRS is being used as a gate-keeping mechanism to reduce the number of students eligible for WISC testing, to a smaller subset of students than even the limited subset identified by the CCAT screen. This is directly contrary to a stated purpose of introducing the new CCAT, GRS screening process, in order to more broadly identify more students suitable for WISC gifted testing.

(k) Recall that the CCAT screen will fail to identify many gifted students, and the failure rate increases substantially as the 'giftedness' of the student increases, and if the student is '2e' (or '3e', etc.) and if the student comes from a less-enriched home environment. Similarly, the GRS is an imperfect predictor of giftedness. In any event, reliance on only the results of a CCAT and/or the only the results of a GRS will fail to identify all, and in fact a substantial number of students who would test over the WISC threshold for being identified gifted by the TDSB.

Recommendations:

(a) Evaluate data on number and percentage of students receiving: CCAT, GRS, and WISC screening, and designation as gifted, and compare with the five previous years' data.

(b) Evaluate, by analysis of data and by feedback from staff and parents, whether GRS is being used as a 'gate-keeper' to screen out students who would otherwise, following CCAT screening, have been referred for WISC testing.

(c) Eliminate GRS assessment as a hurdle to block WISC testing of students who meet the CCAT threshold. Proceed directly to WISC testing for students who meet the CCAT threshold.

(d) Only use the GRS assessment as an additional path for identifying students suitable for WISC testing, for students who have not met the CCAT threshold.

In other words, use the CCAT and GRS screens as an 'either or' path for identifying students to receive WISC testing. Do not use them in combination as a 'must surpass both' threshold before students can receive WISC testing.

Since both assessments are highly imperfect predictors (in different ways) of whether a student will test above 98th percentile on the WISC, a requirement to exceed the threshold on both seems, by design, to be more likely to 'screen out' or 'miss' more gifted students, than a requirement to exceed the threshold on either one or the other.

(e) Develop a path for referring for WISC testing, students who have not been identified by CCAT or GRS screening. This may include IST / SST review of nominations from teachers (current and former) and from parents.

(f) Track data on number of requests made from whom, number of students who receive WISC testing, and number of students who then receive gifted designation.

This will provide valuable feedback about the accuracy of having input from other adults who are much more familiar with the student's profile than the new grade 3 teacher.

(g) Also track data on number of students who:
(i) did not meet CCAT or GRS thresholds, or
(ii) did not receive CCAT or GRS assessments, but subsequently tested above gifted thresholds, by parent-paid (outside) WISC assessment.

This will provide valuable feedback about a subset of otherwise 'missed' students, and may provide insight about how to more accurately 'catch' similar students in the future.

STEP 3: School Support Team consideration of CCAT 7 and GRS test results

The test results from the CCAT 7 and the GRS–S are considered by the **School Support Team (SST)** to determine if further assessment is warranted. Depending on the findings, the SST may recommend referral of a student for an individual intellectual assessment. One purpose for such an assessment is for possible identification of Giftedness at **an Identification, Placement and Review Committee (IPRC)** meeting.

Questions:

(a) What criteria does the SST use to determine if further assessment is warranted? Provide a copy of all instructions and guidelines.

(b) What further assessment is available? WISC-V testing? Other?

(c) Can students be referred by current or former teachers, and/or by parents, for TDSB-administered WISC (or other) testing?

(d) Do SST staff have formal or informal guidelines on recommended or otherwise suggested number or percentage of student population who should receive WISC testing? Provide information and copies of all guidelines, suggested models, etc.

(e) Do SST staff have any training on: (i) the range of profiles of gifted students, and (ii) the lack of accuracy of the CCAT and of the GRS in correctly identifying gifted students. If they do not, and the CCAT and/or GRS are still to be used, can we provide this training? Perhaps create a 'required reading' simple handbook on 'identifying gifted students', which addresses these issues. We would be happy to provide input and/or to assist with preparation of this type of material.

(f) What are 'other purposes for such an assessment'? (From above: "One purpose for such an assessment is for possible identification of Giftedness … ").

Information about the process is posted on the TDSB website, including a **Q & A** about the Universal Screening Test, additional **Information for Parents** and a copy of the Parental **Consent Form** to take the CCAT.

For students who did NOT participate in the Universal Screening Process – Grade 3 (e.g., students in Grade 3 who missed the screening or students in Grades 4 and up), requests for psychological testing must follow the established In - School Team and School Support Team process. For consideration of an existing or external psychological assessment in contemplation of an IPRC, as well as parent requests for an IPRC, these must also follow the regular IST/SST process.

IPRC Determination for Exceptionality: Giftedness

In making its determination, a TDSB IPRC will consider the following:

Classroom Documentation

- Student work samples

Educational Assessment

- The most recent Provincial Report Card (and where the most recent report card is the Progress Report Card, the previous Provincial Report Card)
- Standardized educational assessments (e.g. Developmental Reading Assessment, PRIME, etc.)
- Results from the Universal Screening Assessment (Canadian Cognitive Abilities Test – 7th Edition (CCAT7)
- Results from the Gifted Rating Scale – School Age Record Form (GRS-S) for students aged up to 13 years, 11 months (the upper limit of the GRS-S norms)

- A completed Individual Learning Profile (ILP) from the most recent School Support Team meeting, containing a recommendation to proceed to IPRC

Input from Parent(s)/Guardian(s)

- In addition to oral input at the IPRC meeting, any documents that parent(s)/guardian(s) may deem relevant, which may include pictures of projects completed at home and information regarding participation in outside activities

Professional Assessment

An individual psychological assessment indicating that the student is functioning at or above the 98th percentile on the General Ability Index (GAI) on a recently administered Wechsler Intelligence Scale for Children – 5th Edition (WISC-V), Canadian norms.

Questions / Recommendations:

(a) Is the WISC assessment the main criterion on whether a student is designated gifted?

(b) If so, provide definitive direction to IPRC personnel, that results from "Classroom Documentation" and "Educational Assessment" and "Input from Parent(s)/Guardian(s)" categories above,
  (i) cannot prevent a designation of 'gifted',
  (ii) but can support a designation of gifted, in otherwise close or borderline situations.

(c) Clarify the above stated WISC-V threshold for gifted designation to include:

"An individual psychological assessment indicating that the student is functioning at or above the 98th percentile on the General Ability Index (GAI), *or at or above the 98th percentile on the FSIQ,* on a recently administered … (WISC-V), …"

PLEASE NOTE:

1) Due to practice effects, TDSB will not accept assessments where the same intelligence test has been used twice in a 12-month period.
2) Within the TDSB, an overall maximum of two test administrations will be provided by Psychological Services during the student's school years within the TDSB.
3) TDSB Psychological Services staff will not reassess within a 12-month period, except under special circumstances and after consultation with a TDSB Chief of Psychological Services.
4) The WISC-V is administered when the child's age is chronologically appropriate for grade three or later.
5) The WISC-V is the preferred choice for gifted screening. Other intelligence test results will only be accepted pending approval by a TDSB Chief of Psychological Services.

IPRC Determination of Giftedness (for English Language Learners)

In addition to the considerations noted above under ***Professional Assessment***, when factors of ELL* and cultural background are considered to have a substantial impact on the measurement of intellectual development, the TDSB IPRC will use the following criteria:

- A score at or above the 98th percentile on the General Ability Index (GAI), Verbal Comprehension Primary Index Scale, or Fluid Reasoning Primary Index Scale on the WISC-V, Canadian norms.

*PLEASE NOTE: To qualify for ELL consideration, there must be evidence that the student has received ELL support over three consecutive reporting periods within the last three years. This support must be substantiated by ELL Tracking Sheets and/or report cards with the ELL box marked. Only the IPRC can determine when the ELL criteria will be used based on documentation and consultation with those who know the student.

IPRC Determination of Giftedness (for Students with Learning Disabilities)

In addition to the considerations noted above under Professional Assessment, for students identified with **Learning Disability**, the TDSB IPRC will use the following criteria:

- Assessment information will provide clear evidence that the student has:
  - Indicators of above average intellectual development
  - Information-processing deficits
  - Academic deficits as a result of the processing deficits
- The assessment information, along with IEP information, report card information, and consultation, will lead to the student being designated as exceptional (Communications: Learning Disabilities), prior to considering the use of the Giftedness/Learning Disabilities criteria to identify the student with the Giftedness exceptionality

AND

- A score at or above the 98Th percentile on the General Ability Index (GAI), Verbal Comprehension Primary Index Scale, or Fluid Reasoning Primary Index scores on the WISC-V, Canadian norms.

Concerns:

(a) This is a major change from the previous requirement to obtain a score at or above the 84th percentile on the GAI, Verbal Comprehension Primary Index Scale, or Fluid Reasoning Primary Index scores.

(b) This is very inequitable to students with Learning Disabilities ("LDs"), since higher performance on a WISC is harder to attain with the 'disability' of an LD, despite innate cognitive abilities and other characteristics and needs of gifted students. This major change is not supported by research, and seems only designed to inequitably and dramatically reduce the number of students with LDs who are eligible for Gifted programs.

Recommendation:

(a) Retain the previous requirement for LD students to obtain a score at or above the 84th percentile on the GAI, Verbal Comprehension Primary Index Scale, FSIQ, or Fluid Reasoning Primary Index scores.

* PLEASE NOTE: Only the IPRC can determine when the Learning Disability criteria for Giftedness identification will be used, based on documentation and consultation.

Note:

(a) This statement is redundant if LD students have to achieve the same scores as non-LD students, but it also illustrates the illogic and unfairness of requiring LD students to demonstrate the same scores as non-LD students.

Special Education Programming

Students who meet the criteria for identification of Giftedness may receive a **Regular Class** or a **Special Education Class** placement through the IPRC process. Some students identified with Giftedness can have their learning needs met in the regular class in their neighbourhood school with opportunities for enrichment. Others may opt to remain in the regular program and take advantage of **specialized TDSB education opportunities** open to all TDSB students, such as French Immersion and a variety of specialized programs (e.g., International Baccalaureate Program, Talented Offerings in Physical Sciences (TOPS), Advanced Placement, Elite Athlete Programs, Schools for the Arts, etc.) IPRC placement in a Special Education Class Full Time for Giftedness is available for students entering Grade 4 and up.

The IPRC decision about placement is based on a student's cognitive and learning profile. Typically, students who are eligible for Special Education Class placement with intensive program support for Giftedness:

- Demonstrate an unusually advanced degree of general intellectual ability
- Demonstrate a need for enrichment programming, requiring differentiated learning experiences of a depth and breadth beyond those normally provided in the regular school program to satisfy the student's level of educational potential
- Have a Gifted Rating Scale – School Age Record Form (GRS-S) T score of 60 or higher in one of the 6 scales

Concerns:

(a) This description is unclear. Is meeting or exceeding the WISC threshold the sole, fundamental determinant of whether a student is designated gifted? If so, it should be irrelevant in the IPRC whether a GRS was administered, and what score was obtained, and thus the third bullet point above should be deleted. We thought the sole purpose of administering a GRS was to identify students who may be gifted, and thus should be referred for WISC testing. Please clarify.

(b) In the alternative, is inclusion of the third bullet point above ("attain a score of 60 or higher in one of the GRS scales") a change in policy so that this single score is sufficient to obtain a gifted designation. Please clarify.

(c) Please clarify the first statement above, that "students who meet the criteria for identification of Giftedness may receive a Regular Class or a Special Education Class placement through the IPRC process". Specifically, please confirm that if the student has met the criteria for identification of Giftedness (namely by meeting or exceeding the WISC threshold or such 'other intelligence test results approved by a TDSB Chief of Psychological Services'), and wishes to be placed in a gifted ISP, then both an 'ISP' and 'regular' placement shall be offered, and it is entirely the student's choice of whether to accept a 'regular' or 'ISP' placement.

(d) There are 'horror stories' of IPRC staff attempting to remove from gifted ISP placement, despite parent and student strong desire to remain in the gifted ISP,.students who have already previously been designated as gifted, and even who have already been placed in and have already completed at least one year in a gifted ISP. Please confirm that if the student has met the criteria for identification of Giftedness (namely by meeting or exceeding the WISC threshold or such 'other intelligence test results approved by a TDSB Chief of Psychological Services'), and wishes to be placed or remain in a gifted ISP, then it is entirely the student's choice of whether to accept a 'regular' or 'ISP' placement.

(e) Limitations and inappropriate use of the GRS as a gate-keeper to reduce the number of students identified as gifted have been discussed above. In a nutshell, although high GRS scores may correlate with, or have some relationship with giftedness, they are tangential to the board's sole fundamental definition of giftedness, which only requires attaining a specified score or higher on the WISC. As a result, although high GRS scores may suggest giftedness, scores that are NOT 60 or higher do not preclude identification as gifted. Similarly, as discussed above, although six scales are assessed in the GRS, none has perfect predictive value, and although the Intellectual scale has the highest Sensitivity (SE = only 0.86), many students who are gifted will not be identified by the teacher's GRS assessment.

There are strong concerns about appropriateness of using the GRS as a 'gate-keeper' to reduce the number of students who receive WISC testing, as opposed to using it as a different type of catchment screen, to identify additional students for whom the CCAT scores were close, under the threshold, or not administered.

(f) The criteria listed in all three bullet points above are subjectively evaluated by teachers. There are strong concerns that teachers' lack of training and lack of relevant experience with gifted students often renders the teachers' evaluations to be inherently inaccurate and much less objectively determinative than their resultant numerical scores attempt to convey. This is exacerbated by the fact that these teachers' evaluations will typically occur in the fall, only a few months into the teacher's assessment of a full classroom of new

students, and thus there is insufficient opportunity to fully observe all students' profiles, especially students who are quieter, have disengaged from the classroom, and/or who act out in the classroom.

(g) Further, parents are extremely concerned both about the subjective nature of the evaluations, and that these evaluations are not disclosed to parents so that parents who disagree have an opportunity to respond to (and potentially rebut) teachers' initial untrained, subjective assertions.

(h) Many factors innate to the nature of gifted students will obscure teachers' evaluation of the component items in each of the above three bullet points' assessments. Some of these factors innate to gifted students are highlighted in our summaries above (in '(A) Profiles …'; '(B) Definition …'; and 'Schedule A', attached). These factors lead to many gifted students becoming disengaged and 'checking out' of a regular classroom, and/or misbehaving due to boredom or perceived lack of relevance or connection to the curriculum, peers, and task requirements. This will further negatively affect the teacher's ability to accurately discern the student's abilities and potential. As a result, many of these subjective teacher evaluations will be inherently inaccurate. While they may identify some students who may be gifted, they will miss some other students.

(i) Teachers who have inaccurate recognition of potential giftedness and therefore previously would not have referred a student for WISC testing, may also tend to generate lower 'scores' on the second and third type of evaluation (listed in the bullet points above), in a self-fulfilling pre-determination of whether a student should be referred for WISC testing. In essence then, the GRS and teacher's evaluation are still using the previous model of a decision to test heavily weighted by the grade 3 teacher's subjective evaluation of students. Recognizing this, it seems that in deciding whether it would be appropriate to administer a WISC test, it would be helpful to obtain more 'data points' by also giving more weight to evaluations from parents and from previous or other teachers who may know the student better.

(j) There is a wide-spread perception, including among TDSB staff, that the purpose of the GRS is to further reduce the number of students who will be referred for WISC testing, as part of a concerted effort by the TDSB to decrease the number of students who are identified as gifted. This needs to be clearly addressed and emphatically rebutted in all TDSB communication with and instructions to teachers and other TDSB personnel. If a student is gifted, they have educational needs that need to be addressed, both for the purpose of properly educating each child, and because the board is obliged to do so by legislation. This starts with properly identifying who should be designated, without arbitrary, biased selection, or uninformed teachers implementing their own ad hoc policy.

Recommendations related to use of the GRS :

In view of these limitations, we recommend that:

(a) The IPRC decision criteria listed above (in three bullet points) be alternative, and not summative requirements. In other words, the IPRC shall consider eligibility for a gifted ISP for students who demonstrate …. OR …. The suggestion listed above implies that students must demonstrate …. AND …..

(b) Confirm whether "attain a score of 60 or higher in one of the GRS scales" (listed as the third bullet point in the list above) is a change in policy so that this single score is sufficient to obtain a gifted designation. If it is not sufficient alone to obtain a gifted

designation (i.e. instead of meeting or exceeding the WISC or other intelligence test threshold), then failing to attain a score of 60 or higher should not be a relevant consideration in designating as gifted a student who has met or exceeded the WISC or other intelligence test threshold. This should be clarified.

(c) Due to the limited input and inherently subjective and untrained aspects of these teacher assessments, the GRS and the teacher's assessments should either not be considered in an IPRC, or should be used only to bolster a student's eligibility for gifted designation and placement, and not used to restrict a student's eligibility, in an IPRC in which the student seeks gifted ISP placement.

(d) For these three types of assessments (listed in the three bullet points above), seek equivalent input from, and seek additional evaluations from the student's previous year's teacher(s), who have more intimate knowledge and experience with the students than the new grade 3 teachers who have to evaluate a full class of new, diverse students in the autumn when these assessments are completed.

(e) Give more weight (not just 'lip service') to issues and recommendations raised by parents, who have the longest, and considerably most rich and diverse exposure to the student and their abilities and needs.

(f) Provide clear communication and instructions to all TDSB personnel involved with administering and reviewing the GRS, that although high GRS scores may suggest giftedness, scores that are not 60 or higher do not preclude identification as gifted. With this instruction, provide a summary of the Sensitivity and other data for each subsection, which clearly show less than 100% predictive accuracy for each. Also provide context in a clear statement, that, for example, although high artistic or high leadership scores may be correlated with and have some predictive value of intellectual giftedness, they are not necessary for the student to meet the single, specified criterion of scoring above the designated threshold on the WISC, which is only a measure of intellectual ability. Also, that although it measures intellectual ability, the WISC differs substantially in its measurement structure from the teacher's much more limited assessment of the GRS Intellectual scale.

(g) Similarly provide clear communication and instructions to all TDSB personnel and teachers that their observations of intellectual ability and other areas of ability and motivation may be correlated with intellectual giftedness, but some gifted students, who have already learned to disengage, 'check out', or misbehave due to boredom, etc., may not demonstrate advanced intellectual ability or other abilities or motivation in the classroom.

(h) Provide explanatory context in clear communication and instructions to all TDSB personnel and teachers, that the GRS may be helpful as an additional 'catchment' screen to identify more students for testing who were not identified by the CCAT, but the GRS should not be used to block from WISC testing, students who have already tested above the CCAT threshold.

(i) All TDSB communication with, and instructions to, IPRC personnel, teachers and others regarding the use of teachers' assessments, including the GRS, needs to clearly address and emphatically rebut some staff misperceptions that their role is to reduce the number of students who are referred for WISC testing, and that the GRS and other teacher assessments are tools for doing this.

(j) Notify all parents/guardians ("Parent(s)") of students who have had a GRS, that on request by a Parent, teachers shall give a detailed, written synopsis of the substance and colour of the content of the GRS assessment of the student in question, and shall be required to meet with the Parent, on request, to discuss the teacher's evaluation. The synopsis and the subsequent meeting (if any) shall include the teacher providing relevant specific examples of the child's work, in support of the teacher's assessment. Parents who still have concerns following receipt of the synopsis and meeting with the teacher, may escalate their concerns to the IST / SST.

(k) Eliminate the GRS entirely if it is only being used to reduce the number of students eligible for WISC testing.

In other words, if a student tests above the CCAT threshold, administer the WISC: no GRS required. The GRS should only be used as a different mechanism to identify possible gifted students who were not identified by exceeding the CCAT threshold.

Other Recommendations:

(l) Confirm that if the student has met the criteria for identification of Giftedness (namely by meeting or exceeding the WISC threshold or such 'other intelligence test results approved by a TDSB Chief of Psychological Services'), and wishes to be placed or remain in a gifted ISP, then it is entirely the student's choice of whether to accept a 'regular' or 'ISP' placement.

When placement in a Special Education Class for Giftedness is offered and declined, attendance in the home school continues in the regular class. An **Individual Education Plan (IEP)** is developed in which provision is made for the accommodations required to address the student's learning needs. A plan for some school-based enrichment opportunities can also be developed. Regardless of classroom placement, an annual Review IPRC meeting is held for all identified students and it is crucial that development and careful monitoring of the IEP take place.

Concerns:

(a) Please see concerns and additional recommendations on this section, combined with concerns and recommendations for the following several related sections, all combined together below under the paragraph entitled "In Elementary Schools".

Recommendation:

(a) Gifted and other special education students (seeking placement in suitable programs in which space is available), should be equitably permitted to access and obtain alternative placement mechanisms available to all 'regular' students, including optional attendance, lotteries and waitlists, sibling priority, etc.

(b) IPRC personnel should be clearly instructed that placement in an available ISP other than the 'in district' placement is an acceptable option, that should be supported and permitted on request by the student / parent, in order to best meet the diverse needs of that student.

PLEASE NOTE: A later requested change in level of support from the regular program to a Special Education Class placement must be done through a **Central or Learning Centre Review IPRC**.

Concerns:

(a) Many parents find the basic IPRC process to be an unduly delayed, stressful, pre-determined placebo in which parents' feedback on the needs and requests of their child are not necessarily listened to or factored into the placement decision. To require that parents of students *who are already designated gifted* proceed to a higher level IPRC that is even more removed from the personnel who are more familiar with their children, seems to be an unnecessary escalation, and in particular an overt attempt to discourage students from moving back into a gifted ISP. Since a move back into a gifted ISP in this situation would only be requested by the parents, we can safely conclude that all families requesting this have already made the decision that return to the ISP is the best choice for their child. Since parental input and choice are extremely important in placing special needs students, a request by the parents to move from a regular program to an ISP should be streamlined and facilitated to be as expeditious as possible.

Recommendation:

(a) The 'NOTE' above should be changed to:

"A later requested change in level of support from the regular program to a Special Education Class placement shall be done, expeditiously, through the regular IPRC placement process."

In Elementary Schools:

For elementary students, a Special Education Class Full Time placement begins in Grade 4. It is characterized by a prescribed pupil teacher ratio and targeted instruction to address the full range of a student's academic, emotional, and social development.

The program offers differentiated learning experiences within the student's appropriate age/grade level curriculum, but at a greater depth and breadth than is normally provided in the regular school program.

The recommended class size is 25 for Junior and Intermediate.

The number and location of these programs is determined by the profiles of students requiring Special Education Class placement and programs are located to ensure equitable access throughout the TDSB.

Eligible students are placed in the program closest to the student's home school where there is available space.

A program in any given site can reach capacity, which may result in some students being directed to the next closest site location with available program space.

Only one offer is provided – at the nearest location with available space. There are no waitlists.

The following comments pertain to these related sections above and below. Many of the underlying issues apply to both elementary and secondary gifted ISPs, although some comments below apply more or less specifically to each.

Concerns:

(a) This policy is inequitable, in that for no discernable or justifiable reason, it discriminates against special education students, in comparison with educational choice and options available to all 'regular' students within the TDSB. All 'regular' students, who are willing to travel to another school, because they feel that it better meets their needs, can apply to other school(s) and be allocated an otherwise 'empty' seat by the mechanism of 'optional attendance' or waitlists. This discrimination against special education students is indefensible in general. Additionally, this discrimination seems additionally mean-spirited in that special education students typically have more complex, individualized needs, and are most needing to seek and obtain placements that they feel are most suited to meet their specific needs.

(b) This proposed discrimination against gifted students and refusal to allow them to be able to use optional attendance and waitlist mechanisms to seek appropriate placements seems particularly egregious since:
  (i) these mechanisms are available to all regular students in the TDSB;
  (ii) the gifted student is still seeking and obtaining placement in a gifted ISP;
  (iii) there is empty space available; the requesting student is not displacing a local student, who would have higher priority;
  (iv) the student is not seeking reimbursement of transit costs from TDSB;
  (v) an optional attendance placement costs the TDSB NO additional incremental cost;
  (vi) the student and their family have determined that the requested placement is better able to meet the student's needs;
  (vii) there is no defensible reason, when considering the best interest of each student, to deny a student's request to be placed in an empty seat in a different placement location.

(c) This policy does not seem to consider or seek to address the needs and best interests of a requesting student.

(d) This policy seems likely to achieve for gifted students, either by design or by unintended consequence, a reduction in enrollment in, and subsequent availability of gifted ISPs.

Discussion:

(a) In addition to providing a label of 'gifted ISP', which is a start but in itself is insufficient, there are many factors that contribute to meet a gifted student's needs. These include:
  (i) Number, breadth and depth of selection of courses;
  (ii) Attending a school with or near the student's siblings;

(iii) Attending a school that provides other 'regular' courses, and extra-curricular offerings, that are more aligned with the student's abilities and interests;
(iv) Attending a school that is more accessible to the student or their parents for commuting;
(v) Attending a school with the student's friends and previous classmates;
(vi) Attending a school with a sufficiently large cohort for the student to meet important social and emotional needs in finding a sufficient selection of like-minded peers;
(vii) Etc.

(b) Different gifted ISPs offer individual students more or less of the types of factors discussed in "Discussion" section "(a)" immediately above. This is broadly recognized by the board and by families.

(c) The TDSB has opened some additional gifted ISP sites, for the stated purposes (which we heartily endorse) of making more sites available closer to students' homes, and to accommodate expected increases in placement in gifted ISPs.

(d) We strongly share the TDSB's goal of quickly growing an appealing variety of local, effective, gifted ISPs.

The TDSB's initial model to accomplish this goal has been to try to 'force' local students to attend their local, nascent ISP, with a draconian ultimatum: 'take what we're offering you or you get nothing; no choice'. The unintended effect of this model is to discourage students from accepting placement in local ISP programs they perceive as: unproven; having insufficient depth and breadth (selection) of gifted courses; having teaching staff who are insufficiently experienced in teaching gifted students; having regular courses or extra-curricular programs that are not aligned with their interests or needs; having insufficient and/or too many unknown peers; being too removed from their siblings; etc. As a result, some gifted students are rejecting the offered ISP and accepting the only offered alternative, a 'regular' placement, as the perceived 'lesser of two evils'. This is particularly unfortunate and unjustifiable if there is space available in other programs that the student feels better meets their needs and that the student is willing to independently commute to.

Another model, which we believe would better accomplish the desired goal (of providing more, local, viable, effective, thriving ISPs that better meet students' needs), is to use a more appealing and more successful 'carrot' rather than a 'stick' approach. Specifically, work on applying, and modifying as necessary, the learned experience and 'best practices' from established research and from more established, successful ISPs, to the newer, less robust ISPs. Some starting suggestions are set out below. We would be very happy to work with TDSB personnel in offering suggestions for easy-to-implement, no-cost options to accomplish this. We also understand that TDSB staff in established ISPs would be happy and very helpful in sharing their experience and suggestions with local and central staff working to improve other ISPs.

Recommendations – to help build stronger ISPs:

(a) Offer more gifted courses.

Offer a greater number of courses, in a greater variety of subject areas, at all grade levels.

(b) Fill 'not full' classrooms offering more level 6 gifted courses by dual coding to place (for example, level 3) 'enriched' courses in the same classroom at the same time as level 6 gifted courses. Select 'regular' students eligible to take 'enriched' coded courses by demonstrated advanced ability in that subject, as demonstrated by a relatively high mark (i.e. over 80 or over 85) achieved in that course in the previous year, and/or as nominated by a teacher or guidance counselor with knowledge of that student's ability.

(c) Use 'locally developed courses' to very effectively address specific gifted students' educational needs, at no additional cost. For example, the very effective, expertly designed, gifted program at Northern Secondary School, which has been studied and used as a model program for gifted programs in other North American jurisdictions, offers an excellent level 6 'Tech' course in grade 9 and 10. In each year, students independently choose to enroll in one of three sections (i.e. 'Design Tech', 'Communications Tech', or "Science Tech') that they feel is most aligned with their interests and educational goals. Each Tech course is divided into four sections, three of which offer a variety of relevant topics taught in the usual classroom lecture and evaluation style. The fourth section in each course is an independent study in which each student selects a topic, plans and communicates study and presentation deliverables, is marked on both the product and how well they executed the approved plan, and is supervised by a teacher with background relevant to that topic. All Tech sections are taught by teachers already teaching in that school, who already have relevant subject-area backgrounds. This structure is cognizant of and meets many needs of gifted students to go broader and deeper in specific areas of interest. This could be replicated in other ISPs with minimal planning, at no additional cost, with local modifications as necessary, to enhance the quality and reputations of those ISPs.

(d) Seek meaningful input and guidance in program design from teaching and guidance staff experienced with teaching gifted students and meeting their needs.

(e) Use a 'train the trainer' model, to facilitate knowledge transfer and speedy implementation of best practices, by having experienced gifted teachers train less experienced teachers in both established and start-up ISPs.

(f) Offer and recognize gifted relevant training and experience for teachers teaching gifted courses.

(g) Facilitate teacher placement requests for teachers wishing to teach gifted courses.

(h) Recognize that every 'start up' program will take time to establish and to build a reputation as an appealing option, and be supportive and patient. During this 'growing phase', facilitate the rapid growth of a desirable program by supporting 'best practices', 'train the trainer', research-based program development, and implement other suggestions on expanding course offerings, using dual coding, etc.

In Secondary Schools:

In Secondary Schools, the IPRC placement for students identified with Intellectual Giftedness is **Special Education Class with Partial Integration.** The students will take some of their courses in special education classes for students with intellectual giftedness and they are integrated with students in regular classes for other courses.

Students in Grade 9 and 10 are required to take four special education courses offered for the intellectually gifted. The recommended courses for schools to offer are: English, Math, Science, and Geography/History.

Students in Grade 11 and 12 are required to take two special education courses for the intellectually gifted. The recommended courses for schools to offer are: English and Math.

Courses for students who are intellectually gifted follow the Ontario curriculum, but offer greater breadth and depth to the topics under study. There may be some variation in the course offerings at different secondary sites.

Concerns + Discussion:

(a) These two recent changes:
   (i) to reduce the recommended number of minimum gifted courses (from 4+4+3+3, to 4+4+2+2), and
   (ii) to eliminate the recommendation that these numbers be a "minimum" offering, are very negative changes to gifted education, have no justifiable reason, and can be fixed quickly, easily, and at no cost.

(b) Many gifted students need to take much more than 4+4+2+2 (=12) courses out of a total of 30 courses in secondary school, particularly as all students of all abilities start to increasingly differentiate as to the level (tech, applied, academic, gifted) and content (maths and sciences, languages, arts, history, geography, etc.) of courses they take at the secondary level. Not only do they need a broader selection of courses than the minimum suggested above, but overall they need more than a total of 12 courses spread over four years to be offered. Offer the courses, and let the students choose.

(c) All students have different areas of strengths, and by secondary school are often starting to concentrate in (and out of) different areas of specialty. Thus, failing to offer multiple courses in multiple areas of study, fails to meet the needs of gifted students and ignores all of the research-confirmed reasons why gifted students need gifted ISPs. For example, some students will concentrate in sciences, but the examples above not only fail to recommend any Science course in grade 11 and 12, but completely ignore that students concentrating in Science will take three Science courses (Biology, Chemistry, and Physics) each year. Similarly, some students will concentrate in the Humanities, Languages, Social Sciences, History, and/or Geography, etc., and will not take any Science or extra Math courses, but will have also have none of their relevant courses to take at the Gifted level, beyond a single introductory grade 9 and 10 History and Geography. Thus a "Gifted ISP" without sufficient variety, depth, and breadth of course selection, (and the accompanying sufficiently large cohort), is perceived by many to be an empty, shell program, with a label but insufficient useful content.

This is one of the major reasons why newly created Gifted ISPs are having under-enrollment problems. From the student's and family's perspective: Why would teenage students choose to move to a different school; leave their friends and peers; commit to class sizes with insufficient cohorts to meet the social and emotional needs of any teen, let alone a gifted teen; in order to be stuck with insufficient course offerings to meet their gifted educational needs in general, and their specific emerging areas of specialty concentrations in particular.

(d) There is no justifiable reason why more courses (quantity, breadth and depth of selection) can't be offered at the gifted level. There is no different incremental cost to have the same teacher who teaches a few academic and a few gifted courses per day, teach a few more courses at the gifted level and a few less at the academic level.

(e) Refusal to offer additional courses at the gifted level seems designed to discourage students from taken a placement in a gifted ISP, since there isn't that much of a difference from placement in a regular program.

(f) Conversely, more courses offered at the gifted level in more subjects is much more appealing to a wider array of students with more diverse interests, and will attract and retain more students in gifted ISPs. Improving course selection becomes part of a 'growing snowball' dynamic, interacting with another fundamental required component of successful gifted ISPs, which is to grow the size and diversity of the cohort. Thus, more courses attract more students, and in turn, more students attract more students, which in turn allows for a greater number of more diverse courses to be offered, which in turn attracts a greater number of more diverse students, which in turn attracts a greater number of more diverse students, and so on.

This is a very easy, quick, no-cost 'fix' to start to make new, under-enrolled ISPs more appealing and to have immediate, positive effects on growing those ISPs. This also greatly enhances the caliber and scope of TDSB education. This also easily, quickly, and at no additional cost, meets all TDSB pre-eminent goals, of improving student "Achievement", "Equity", and "Well-being".

(g) There are a variety of ways to help support adequate class size in both new and established gifted ISPs, in order to offer a diverse range and number of courses, and to attract more students, in order to meet the needs of more students. Here are some starting suggestions:

(i) Allow schools the option of filling otherwise 'not full' gifted classrooms by using 'dual coding' to fill some empty seats with academically advanced students seeking and able to handle more advanced breadth and depth in that subject. For example, allow a 'regular' student who attains a specified mark (i.e. 80% or 85% or higher) in Math, and/or who has a recommendation letter from a teacher or guidance counselor, to enroll in the same classroom at the same time as the 'gifted Math' class, but perhaps with a different coding (i.e. 'level 3 math at 9:00 a.m. in room 201', with 'level 6 math at 9:00 a.m. in room 201'), etc.

(ii) Clarify current ambiguity by clearly specifying that students with a gifted designation enrolled in another 'part time' specialty program (i.e., 'Cyber Arts'), can be placed in 'gifted' (level '6') courses for their non-specialty courses such as Math, English, Sciences, Histories, Geographies, etc. (Currently some gifted students are encountering some challenges in enrolling in courses at the gifted level.)

(iii) Allow students with a gifted designation to take courses at the gifted level, even if they are taking less than the 'minimum' number of courses recommended at the gifted level for that grade. There is no justifiable reason not to do this: secondary ISPs only offer part-time integration anyway. Failure to take a minimum number of courses at the gifted level only changes the degree of partial integration; no full time integration is offered in any event.

(iv) Utilize 'locally developed courses', such as the grade 9 and 10 'Tech' stream of courses at Northern Secondary School, discussed above, to address and meet multiple students' multiple needs for additional, relevant, gifted education.

(v) Allow students to self-select good educational 'fit', by equitably allowing all students to access optional attendance, waitlist, and sibling priority mechanisms that are accessible to all other students in the TDSB. There appears to be a misconception that requests will only flow to – i.e. larger schools, but this incorrectly prejudges individual factors in decision making. Factors already discussed above (such as wanting to remain with previous friends and classmates) may lead to choosing a 'smaller' school, but many other factors will also be decisive – i.e. some students, perhaps for emotional or social reasons, or for geographic convenience, etc., specifically inherently want a smaller, rather than larger school and cohort, etc. Let the student select based on their own decision criteria and their best assessment of their own needs.

(vi) Etc.

Recommendations:

(a) Change the description above to specify that it is "recommended" that students in a particular grade are required to take "a minimum of" a number of courses.

For example, change the description above to read "It is recommended that *students in Grade 9 and 10 take* a minimum of *four special education courses ….".*Similarly, change the requirement above to read: "It is recommended that s*tudents in Grade 11 and 12 take* a minimum of *two special education courses ….".*

(b) Change the description above to specify that the recommended list of courses is a "minimum" recommendation.

For example, change the description above to read *"The* minimum recommended *courses for schools to offer are: English, Math, Science, and Geography/History.* Similarly, change the requirement above to read*: "The* minimum recommended *courses for schools to offer are: English and Math."*

(c) Instruct schools with gifted ISPs to offer much more than the minimum recommended number and limited selection of courses set out above. Specifically, broader and more numerous course offerings at the gifted level should continue through all four years of secondary school, and multiple options should be offered to properly educate across a variety of subject areas (i.e. Sciences, English, History, Geography, Languages, Humanities, etc.)

(d) Implement a variety of quick, easy, no-cost mechanisms to help support adequate class size in both new and established gifted ISPs, in order to offer a diverse range and number of courses, and to attract more students, in order to meet the needs of more students. These can include:

(i) Allow schools the option of filling otherwise 'not full' gifted classrooms by using 'dual coding' to fill some empty seats with academically advanced students seeking and able to handle more advanced breadth and depth in that subject. For example, allow a 'regular' student who attains a specified mark (i.e. 80% or 85% or higher) in Math, and/or who has a recommendation letter from a teacher or guidance counselor, to enroll in the same classroom at the same time as the 'gifted Math' class, but perhaps with a different coding (i.e. 'level 3 math at 9:00 a.m. in room 201', with 'level 6 math at 9:00 a.m. in room 201'), etc.

(ii) Clarify current ambiguity by clearly specifying that students with a gifted designation enrolled in another 'part time' specialty program (i.e., 'Cyber Arts'), can be placed in 'gifted' (level '6') courses for their non-specialty courses (i.e. Math, English, Sciences, Histories, Geographies, etc. (Currently some gifted students are encountering some challenges in enrolling in courses at the gifted level.)

(iii) Allow students with a gifted designation to take courses at the gifted level, even if they are taking less than the 'minimum' number of courses recommended at the gifted level for that grade. There is no justifiable reason not to do this: secondary ISPs only offer part-time integration anyway. Failure to take a minimum number of courses at the gifted level only changes the degree of partial integration; no full time integration is offered in any event.

(iv) Utilize 'locally developed courses' (such as the excellent grade 9 and 10 'Tech' stream of courses at Northern Secondary School, discussed above) to address and meet multiple students' multiple needs for additional, relevant, gifted education.

(v) Allow students to self-select good educational 'fit', by allowing all students to access optional attendance, waitlist, and sibling priority mechanisms that are accessible to all other students in the TDSB. Let the student select based on their own decision criteria and their best assessment of their own needs.

(vi) Etc.

Secondary School Boundaries for Students with Giftedness Exceptionalities

After students have been recommended to a Special Education Class for Giftedness, parents can find the closest Secondary Gifted program site location through the link posted on the TDSB website at: http://www.tdsb.on.ca/Findyour/School/GiftedProgramSchoolFinder.aspx.

PLEASE NOTE: It is possible that a program in any given site can reach capacity, which may result in some students being directed to another site location with available program space. When placement in a Special Education Class for Giftedness is offered and declined, attendance in the home school continues in the regular program. For more information about student placement in TDSB Secondary programs for Giftedness, see the **Q and A** posted on the TDSB website.

Recommendation:

(a) Gifted and other special education students (seeking placement in suitable programs in which space is available), should be permitted to access and obtain alternative placement mechanisms available to all 'regular' students, including optional attendance, lotteries and waitlists, sibling priority, etc.

(b) IPRC personnel should be clearly instructed that placement in an available ISP other than the 'in district' placement is an acceptable option, that should be supported and permitted on request by the student / parent, in order to best meet the diverse needs of that student.

IN CONCLUSION:

The stated purpose of several changes to the policies and practices for gifted identification, placement, and education, was to accurately identify more gifted students and to better meet their educational needs.

There is considerable concern that several of the recent changes either have an unintended opposite effect, or seem either designed in theory or implemented in practice to have the opposite effect. Some changes seem to have been made without reference to or understanding of the considerable body of research about the profiles of gifted students and how to meet their needs. Gifted students needs can be much better and more effectively addressed with slight changes to policies and practices, which are of virtually no consequence to TDSB practices, but are of enormous, life-changing impact for the students. An additional fortuitous bonus is that effective gifted students education, with changes such as those recommended here, can almost always be delivered with minimal changes to policies and process, with no changes to buildings and facilities, and NO additional incremental cost, relative to 'regular' students' education.

We very much appreciate the opportunity to provide feedback on the Special Education Plan on the Gifted exceptionality section, and we very much look forward to working collaboratively with the TDSB to expeditiously and noticeably improve education for gifted students.

‘Schedule A’ - Partial list of References (regarding definition of giftedness)

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