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The Wisconsin Association of Supervision and Curriculum Development (WASCD) is providing this letter in an effort to provide the Department of Public Instruction with the following comments in lieu of testimony on proposed changes to the rules for identifying gifted and talented students.

The Wisconsin ASCD supports:

- the clarification of the language on the areas of identification (general intellectual, specific academic, leadership, creativity, and visual and performing arts);
- re-emphasis of the importance of being responsive to pupils' economic conditions, race, gender, culture, native language, developmental differences, handicapping conditions, and other factors that mitigate against fair practice;
- the concept of multiple measures for effective assessment practices.

However, Wisconsin ASCD encourages the Department of Public Instruction to **consider the implications** of the following rule changes, including the Fiscal Note which states that, "...these rules are not expected to have a significant local or state fiscal effect. School districts may have to purchase some additional assessment materials if they need to use a tool they don't already have and assign staff to administer any new screening or testing that takes place." WASCD has the following concerns:

- More sophisticated identification procedures would draw away from already limited district resources to effectively address student needs (staff, materials, time).
- Given the shift of human resources toward identification, there would certainly be a negative effect on instruction and learning, especially in the hundreds of small, rural and low-revenue districts where staff members have multiple responsibilities.
- The DPI currently provides limited professional development in differentiation strategies and does not have the capacity to support districts effectively.
- Other states that are serving as comparisons for the changes are not operating under revenue limits.
- There are NOT sufficient resources under the revenue limits to sustain the proposed changes.

Fundamentally, WASCD believes the original 20 standards found in Statute 121 should be revised to reflect sound research-based practices that encourage an integrated model rather than a rigid identification model focused on compliance. The ability to recognize students with clear strengths and provide a quick systemic response through a sound pyramid of interventions is far better than investing in formal identification of 5-year-olds resulting in limited resources for accelerating learning.

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