



**National Association for Gifted Children**  
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January 11, 2016

The Honorable John B. King, Jr.  
Acting Secretary of Education  
U.S. Department of Education  
Washington, DC

RE: Docket ED-2015-OESE-0130

Dear Acting Secretary King:

The National Association for Gifted Children (NAGC) submits the following comments in response to the December 22, 2015, request for recommendations prior to publishing proposed regulations to implement programs under Title I of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (ESSA).

The failure to cultivate large percentages of advanced achievers in the U.S. over the last decade has received little attention, resulting in large discrepancies in advanced achievement among children in poverty and from other at-risk subgroups and their more advantaged peers. As schools and policymakers have been focused on closing achievement gaps for struggling learners in poverty, virtually no attention was focused on low-income students with high ability. Giftedness is found in all populations of learners, requiring different strategies and interventions to convert high potential to high achievement. Changes in ESSA now allow us to address the problem with new data and programming.

The Congress, through ESSA, added language to Title I specifying that school districts may use their Title I funds to identify and serve gifted and talented students (see ESSA sec. 1112(b)(13)). This provision clearly overturns current Department of Education directives on the use of Title I funds for gifted education that have been impeding efforts to address the advanced achievement discrepancies. In order to notify the nation's schools leaders about this important development so that planning can begin for the next school year, NAGC urges the Department to echo this provision of the law in regulations. NAGC also requests that a letter go to the chief state school officers reversing the Department's prior directives and clarifying that Title I funds may be used to identify and serve low-income gifted and talented students.

Many schools and districts do not identify low-income children for specialized advanced academic programs or services designed to maximize their abilities. Many low-income schools do not even offer advanced courses such as calculus or physics. We should not be surprised, then, that low-income high achievers not only lose academic ground during their K-12 education, but fewer low-income students become high achievers during K-12 than do their more affluent peers. We can see the results nationally on the grade 4 NAEP math exam, where 2% of children eligible for free and reduced lunch scored at the advanced level in 2011, compared to 11% of non-eligible students. The 9% "excellence gap" between the student groups in 2011 grew to 11% in 2013 and 2015. Closing the math excellence gap for low-income students in every grade would mean hundreds of thousands more students performing at the advanced level in math every year.

Although school decision makers have previously paid scant attention to achievement gaps at the advanced level, the Congress has determined through ESSA that districts and states will now collect and publish student performance at *each* of the state's achievement levels (see ESSA sec. 1111(h)(1)(C)(ii)). This new information will allow the public and school leaders to see the excellence gaps in their communities and states for children in poverty and other student subgroups, and to make necessary course corrections. NAGC urges the Department of Education to include competitive preference priorities that address state and local excellence gaps in discretionary grant applications, as appropriate.

The nation has a long way to go to ensure equitable access to high-level, challenging programs and services for all high-ability students who would need them to reach their potential. However, the new advanced student achievement information that will be published on state and local report cards, and the clear direction from Congress that Title I funds may be used to support low-income gifted students are two very strong initiatives for improving educational outcomes for all our students and for the future of the nation.

Sincerely,



George Betts, Ed.D.  
President



M. René Islas  
Executive Director