Gifted Program

Services are not aligned with funding intent
Why we did this review
Georgia’s Gifted program is the largest non-general education program funded by the state’s Quality Basic Education (QBE) formula, based on student enrollment. The program receives funding at a weight that is between 30% and 68% higher than general education programs (i.e., base amounts for high school, middle school, etc.).

We conducted this performance audit to evaluate the extent to which Gifted identification practices and services align with recognized best practices and the state’s QBE funding formula.

About the Gifted Program
First incorporated into state law in the 1950s, Georgia’s Gifted program provides services to intellectually gifted students. It is one of 18 instructional programs funded by the state’s QBE funding formula, which was established in 1985. To be eligible for Gifted services, students must be identified as having intellectual needs requiring specialized instruction. The eligibility process requires testing to ensure the student meets state-specific criteria.

In fiscal year 2022, approximately 113,000 full-time equivalents were served through the Gifted program generating $726.5 million in QBE funding. Since fiscal year 2016, Gifted QBE funding allotments have increased by nearly 26% ($151 million).

Gifted Program
Services are not aligned with funding intent

What we found
Georgia’s Gifted program uses many best practices; however, deviations from these practices reduce the program’s effectiveness. Systems typically use larger class sizes than those set in the funding formula, and some do not follow the requirement to use a Gifted-endorsed teacher. Increased use of best practices may also help identify additional Gifted students, particularly from groups that are underrepresented (compared to the general student population).

Implementation of the Gifted program diverges from the funding formula intent and best practices.

While the state provides Gifted funding based on a ratio of 1 teacher for every 12 students, most school systems have waived state-imposed class size requirements under system flexibility. As a result, most Gifted classes exceed this ratio—in fiscal year 2021, for example, more than 77% of Gifted classes across the state exceeded 12 students and Gifted classes averaged 23 students per teacher. Despite the larger classes, systems still receive state funding using the Gifted program weight, which is higher than the funding for general education services. It is also more difficult for Gifted teachers to deliver individualized instruction to promote differentiation in larger class sizes.

Additionally, local school systems have earned Gifted funding for classes that did not meet state requirements. Systems should only receive Gifted funding for students who meet eligibility requirements and for classes with a Gifted-endorsed teacher, and these requirements cannot be waived. However, we found that local school systems earned an additional $13.1 million in fiscal year 2021 for segments that did not meet these requirements (segments are used to allocate state funding for students’ classes). In fiscal year 2021, 2% (3,800) of the approximately 195,000 students with Gifted segments were not shown as Gifted-eligible in the Georgia Department of Education’s (GaDOE) data. Additionally, 10% (7,500) of the 76,600 Gifted classes lacked a Gifted-endorsed teacher.

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1 As noted on page 16, we also identified discrepancies in GaDOE’s data that could indicate up to $20 million more in potential overpayments.
We also identified risks related to Gifted service delivery models allowed by GaDOE, although the higher risk models were less common. Gifted education is intended to provide differentiated instruction to intellectually gifted students whose needs are not adequately met by general education services. However, not all service delivery models provide the same assurance of differentiated instruction. Two of the eight GaDOE-approved models (Cluster Grouping and Collaborative Teaching) provide Gifted instruction within the regular classroom. According to best practice literature, this presents a higher risk that the instruction for gifted students is not sufficiently differentiated from general education. These models are most common in elementary schools but were used less frequently overall than those that are more likely to ensure differentiation.

**GaDOE could implement additional best practices to help improve gifted identification.**

GaDOE requires systems to follow many best practices for gifted identification; however, its guidance does not include several recommended strategies that can help identify students who might otherwise be missed. For example, GaDOE does not require universal screening, which is considered one of the most important tools in ensuring every student—particularly those in underrepresented groups—receives consideration for Gifted services. Other best practices can also help improve gifted identification, such as training teachers on how to identify gifted students and making program information available in multiple languages to parents and students. It should be noted that many systems utilize these practices—particularly universal screening—despite the lack of state requirements.

**Systems face resource constraints in implementing Gifted services.**

Resource constraints can inhibit systems from implementing best practices related to identifying Gifted students. Fewer resources can also impact the number of Gifted-endorsed teachers when systems cannot provide stipends or other incentives to those obtaining the required training. These issues can reduce the funding that systems receive to implement the program (systems only receive funding for Gifted-eligible students served by a Gifted-endorsed teacher). Additionally, resource limitations impact which delivery models school systems select for their Gifted classes to ensure differentiated instruction.

**What we recommend**

We recommend that GaDOE implement data controls to ensure that funds at the Gifted program weight are only given to eligible students and classes with a Gifted-endorsed teacher. We also recommend that GaDOE periodically review its class data to determine the extent to which services align with the intent of the Gifted program and include additional guidance about identification strategies in its Gifted Resource Manual.

See Appendix A for a detailed listing of recommendations.

**Agency Response:** GaDOE pointed to “an increase over time in the number of students identified as eligible for gifted” and the role that its support has played in this increase. GaDOE also helps “districts to maximize gifted services” by administering teacher endorsement grants and providing a free gifted development course (for high school AP/IB teachers). GaDOE also stated, “If the General Assembly sets new expectations in state law, GaDOE is committed to implementing the suggested recommendations and adopting corresponding data controls.” In addition, GaDOE noted that the data analyzed for the audit was impacted by the pandemic. Specific responses are included at the end of each relevant finding.

**Auditor Response:** We considered potential impacts from the pandemic and obtained data from fiscal years 2017 through 2021 to address this issue. For each issue discussed in the report, our analysis identified the same trend in the years prior to the pandemic. However, to simplify reporting, we have included only the most recent year(s).
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**Purpose of the Audit**

This report examines the Georgia Department of Education’s (GaDOE) Gifted program. Specifically, our audit set out to determine the following:

1. Do local education agencies (LEAs) consistently identify and place Gifted students according to best practices?
2. Do LEAs consistently provide Gifted services according to best practices?

A description of the objectives, scope, and methodology used in this review is included in **Appendix B**. A draft of the report was provided to GaDOE for its review, and pertinent responses were incorporated into the report.

**Background**

**Gifted Education Program Description**

In the 1950s, Georgia was the first state to enact legislation directing local school systems to offer programming to gifted education students. In 1985, the state instituted the Quality Basic Education (QBE) formula, which included Gifted as one of the programs for which the state provides funding to local school systems. As one of the 18 current QBE programs, the Gifted program provides state funds for instruction to meet the learning needs of intellectually gifted students.

The Georgia Department of Education (GaDOE) is the state agency responsible for overseeing K-12 public education, which is administered by county and city school systems and charter schools. O.C.G.A. § 120-2-152 authorizes Gifted services as part of special education services, which provide students modifications to their educational program to help them achieve their full academic potential. The statute also gives the State Board of Education (SBOE) authority to adopt eligibility criteria and other requirements for state-funded Gifted services. While gifted education is grouped with special education in Georgia law, the federal government has no mandates or regular funding for gifted services (unlike programs for other students such as those with disabilities, which is governed by the federal Individuals with Disabilities Education Act). As a result, requirements for gifted programs are determined by individual states.

In fiscal year 2021, approximately 199,000 students in Georgia received Gifted services at 171 local school systems and 27 state charter schools.

**GaDOE’s Description of a Gifted Student**

One who demonstrates a high degree of intellectual and/or creative ability(ies), exhibits an exceptionally high degree of motivation, and/or excels in specific academic fields, and who needs special instruction and/or special ancillary services to achieve at levels commensurate with his or her ability.

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*In fiscal year 2021, 9 of 180 (5%) local school systems and 12 of 39 (31%) state charter schools did not provide Gifted classes.*
Gifted Program Administration

At GaDOE, the Gifted program is overseen by the College Readiness and Talent Development program under the Office of Teaching and Learning, as shown in Exhibit 1. Currently, three staff members administer the Gifted program. These staff maintain and annually update the Georgia Resource Manual for Gifted Education Services (Gifted Resource Manual). The manual acts as a reference guide for local school systems and outlines gifted referral procedures, eligibility guidelines, and service delivery models. GaDOE staff also provide guidance and support to individual school systems through regular interaction with local Gifted coordinators. Each local Gifted coordinator is responsible for the overall administration of their system’s Gifted program, which includes program planning and communication with GaDOE’s program manager. Responsibilities may also include administering gifted assessments.

Exhibit 1
Three GaDOE Staff Administer the Gifted Program

Other divisions at GaDOE are also involved in the Gifted program through their administration of state education policy and funding. The Office of Policy, Flexibility, and External Affairs helps develop program rules and regulations, approves the Gifted Resource Manual, and facilitates the state’s policy on school
system flexibility. Additionally, Data Collection and Reporting oversees the collection of student and instructional data for the purpose of administering the QBE formula.

Gifted Identification

To be eligible for Gifted services, students must first be identified as having intellectual needs that necessitate specialized programming. As shown in Exhibit 2, a student enters the identification process through a reported referral (from a teacher, parent, or peer) or automatic referral (based on standardized test scores). Referred students are then assessed by an eligibility team made up of Gifted-endorsed educators and counselors who determine whether the student should undergo formal evaluation for the Gifted program.

Exhibit 2

The Gifted Student Eligibility Process Has Four Phases

- **Referral**
  - Students are considered for Gifted services via Reported Referral or Automatic Referral.
  - **Reported Referral**: Students are referred by teachers, counselors, administrators, parents/guardians, peers, self, or others with knowledge of the student's academic abilities.
  - **Automatic Referral**: Students who score at specified levels (as established by SBOE) on nationally norm-referenced tests are automatically referred to the program.

- **Student Search Eligibility Team**
  - The Student Search/Eligibility Team is a panel of evaluators who assess referred students' products and performance to determine whether the student should continue to the formal evaluation phase.
  - If the student will continue to evaluation, their parents receive a notification letter that indicates their child is being considered for evaluation and includes general eligibility information. Parents may either provide written consent for or refuse evaluation.

- **Formal Evaluation**
  - All students with written consent are referred to be evaluated in four categories: Mental Ability, Achievement, Creativity, and Motivation.
  - For further information on required test scores, please refer to Appendix C.

- **Final Determination**
  - The Student Search/Eligibility Team reviews the evaluation results for the student and makes a final recommendation that the student is eligible or not eligible for the Gifted program.
  - For students eligible for Gifted services, the system must obtain final written consent from their parents/guardians before providing Gifted services.

Source: GaDOE Gifted Resource Manual
During the formal Gifted evaluation, students are tested in four areas—mental ability, achievement, motivation, and creativity—that are set by SBOE. For each area, the school system may select a nationally norm-referenced test\(^3\) or rating scale approved by GaDOE. Students may qualify under either of two options (see Appendix C for qualifying scores in the four areas for each option):

- Option A, with a qualifying score in both mental ability and achievement or
- Option B, with a qualifying score in three of the four areas.

Once a student is determined eligible for Gifted services, they are considered eligible at any other school system in the state.\(^4\) Students found eligible in another state do not automatically become eligible in Georgia, unless the student is a dependent of military personnel. Students who are not found eligible may be retested later.

**Gifted Services Description**

To assist school systems in providing differentiated instruction for Gifted-eligible students, GaDOE’s Gifted Resource Manual outlines eight delivery models that systems can select from. As shown in Exhibit 3, these models differ primarily in how they offer services, which can be provided via direct instruction (given directly by the Gifted instructor) or indirect instruction (given by another instructor or taking place outside the regular classroom). Some models, like internships and mentorships, are only available in high school. For certain delivery models, the Gifted Resource Manual also provides recommendations for class sizes and limitations on the number of segments.

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\(^3\) A norm-referenced test is an assessment that compares an individual’s results with a large group of individuals who have taken the same assessment (e.g., all students nationwide). Examples include the SAT and Iowa Test of Basic Skills.

\(^4\) Eligible students may continue participation in the Gifted program as long as they demonstrate satisfactory performance. Systems determine their policies on satisfactory performance, as well as probationary periods for students not meeting performance policies.
## Exhibit 3
GaDOE Recognizes Eight Gifted Service Delivery Models

<table>
<thead>
<tr>
<th>Model</th>
<th>Description</th>
<th>Classroom Makeup</th>
<th>Grades</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Direct Model</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Resource Class</td>
<td>Curriculum content and pace appropriate for Gifted learners and focused on interdisciplinary enrichment</td>
<td>Only Gifted-eligible students may participate</td>
<td>K-12</td>
</tr>
<tr>
<td>Advanced Content¹</td>
<td>Differentiated content, teaching, pacing, process skills, and assessments in areas such as computer science, math, language arts, and/or social studies</td>
<td>May include non-Gifted eligible students with exceptional ability in the content area</td>
<td>K-12</td>
</tr>
<tr>
<td>Cluster Grouping</td>
<td>Services provided in the regular classroom using separate lesson plans in areas such as computer science, math, language arts, and/or social studies</td>
<td>Recommended 6-8 Gifted students in otherwise heterogeneous class</td>
<td>K-12</td>
</tr>
<tr>
<td><strong>Indirect Model</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Collaborative Teaching</td>
<td>Services provided by students’ regular teacher in collaboration with a Gifted-endorsed teacher, who assists with creating separate lesson plans</td>
<td>Maximum of 8 Gifted students in otherwise heterogeneous class</td>
<td>K-12</td>
</tr>
<tr>
<td>Internship/Mentorship</td>
<td>Students work with a mentor (while supervised by a Gifted-endorsed teacher) to explore a profession of interest</td>
<td>May include non-Gifted eligible students with exceptional ability in the content area</td>
<td>9-12</td>
</tr>
<tr>
<td>Directed Study</td>
<td>Students explore a challenge/subject of interest under the supervision of a Gifted-endorsed teacher</td>
<td>May include non-Gifted eligible students with exceptional ability in the content area</td>
<td>9-12</td>
</tr>
<tr>
<td>Community Service Learning</td>
<td>Students complete a community service learning project under the supervision of a Gifted-endorsed teacher</td>
<td>May include non-Gifted eligible students with exceptional ability in the content area</td>
<td>9-12</td>
</tr>
<tr>
<td><strong>Other</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Innovative Model</td>
<td>School systems may develop programs based on perceived needs of local Gifted students</td>
<td>Determined by the school system</td>
<td></td>
</tr>
</tbody>
</table>

¹ Advanced Content includes Advanced Placement (AP), International Baccalaureate (IB), and honors/advanced classes.

Source: GaDOE Gifted Resource Manual

Regardless of delivery model, GaDOE policy requires Gifted classes to have a teacher with a Gifted endorsement. This teacher is typically the teacher in the student’s classroom. (Under the Collaborative model, a Gifted-endorsed teacher collaborates with the regular classroom teacher to provide differentiated instruction.) To earn a Gifted endorsement, teachers undergo training intended to improve their ability to provide instruction to Gifted students and to better identify gifted traits among students. Endorsement training programs must be approved by the Georgia Professional Standards Commission. The programs are offered by Regional Education Service Agencies and various colleges, as well as some school systems that operate their own endorsement programs. Gifted endorsement programs typically consist of four classes over a total of 200 hours. Additionally, many programs require participating teachers to have at least one year of teaching experience. Once the program is completed, the teacher must complete required professional learning for their teaching certificate, but the endorsement does not require ongoing gifted training.

The endorsement requirement does not apply for Advanced Placement and International Baccalaureate diploma classes (types of Advanced Content courses) where the teacher has completed training approved by the relevant entity along with a 10-hour gifted professional development course.
System Flexibility
In June 2015, each school system in Georgia was required to decide whether it would remain a Title 20 system or become a charter system or strategic waiver system. Charter systems and strategic waiver systems have varying degrees of flexibility to deviate from certain state laws and regulations related to academic programs, human resources, and finance. Charter systems are granted blanket waivers from most of Georgia’s education laws, while strategic waiver systems receive exemptions from specific requirements. Title 20 systems are granted no waivers and must abide by all Title 20 requirements (i.e., state education law).

Under system flexibility, strategic waiver and charter systems can waive most Gifted program requirements, including class size, model specifications, and the requirement that each Gifted-eligible student receive at least five Gifted segments per week. However, for Gifted program classes, student eligibility criteria and teacher endorsements are not covered by the waivers under system flexibility.

As of fiscal year 2023, 132 systems operate as strategic waiver systems, and 46 are charter systems. Two systems (Buford City and Webster County) remain Title 20 systems.

Gifted QBE Earnings
All school systems receive most of their state funding through the QBE funding formula. The main component of the formula is the earnings calculation based on the number of full-time equivalent (FTE) students, which provides a foundation level of funding. Each school system’s FTEs are multiplied by a base amount and a program weight. Each instructional program has a specific funding weight, ranging from the base weight of 1.0 for High School general education (equivalent to $2,897 per FTE for fiscal year 2023), to a weight of 5.871 for Category IV Special Education (equivalent to $17,092 per FTE). The Gifted program weight is 1.6794, and the per-FTE amount was $4,880 for fiscal year 2023. See Appendix D for a complete listing of programs and associated costs.

These program weights are used to allocate state QBE funding based on the instructional services each student receives. To capture data needed for the QBE calculation, local school systems submit FTE data to GaDOE twice per year, once in October and again in March. One FTE represents six periods, or segments, of state-funded instruction on the day of the FTE count. GaDOE uses this data to determine how much QBE funding each school system receives.

With approximately 114,000 FTEs statewide in fiscal year 2022, the Gifted program is the largest non-general education QBE program. As shown in Exhibit 4, QBE earnings for the Gifted program were $726.5 million in fiscal

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6 Program weights in this paragraph are those specified in state law. O.C.G.A. § 20-2-161 sets the weight for each program but allows GaDOE to vary the weights each year by up to 1.5% from the statutory weight, as needed.

7 There are five QBE general education programs based on grade level (e.g., Middle School, High School) that provide funding for most FTE segments. The 13 other QBE programs provide higher weights for more specialized services (e.g., Remedial Education, Gifted, English Speakers of Other Languages).
year 2022, which represented 8% of the $9.6 billion in total QBE earnings. Between fiscal years 2018 and 2022, the number of Gifted FTEs increased by 5% (from 108,189 to 113,442), and QBE earnings increased by 16%. QBE earnings increased at a faster rate due to cost increases, such as the end of austerity cuts in fiscal year 2019 and increases in teacher salaries and benefits in fiscal years 2020 and 2022 (which contributed to increases in QBE funding across all instructional programs). Gifted FTE growth slowed during the COVID-19 pandemic, with systems indicating delays in the Gifted identification process while students attended remotely.

**Exhibit 4**
Gifted FTEs Increased by 5% and Gifted QBE Earnings Increased by 16% (FY 2018-2022)

<table>
<thead>
<tr>
<th></th>
<th>FY2018</th>
<th>FY2019</th>
<th>FY2020</th>
<th>FY2021</th>
<th>FY2022</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>FTE Count</strong></td>
<td>108,189</td>
<td>110,646</td>
<td>113,334</td>
<td>114,326</td>
<td>113,442</td>
</tr>
<tr>
<td><strong>QBE Allotment</strong></td>
<td>$628,373,355</td>
<td>$664,760,905</td>
<td>$714,096,605</td>
<td>$725,293,257</td>
<td>$726,523,584</td>
</tr>
</tbody>
</table>

*Source: GaDOE QBE Allotment Sheets*

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8 Austerity cuts reduced the calculated QBE earnings to determine the final allotment amount. For example, in fiscal year 2018, QBE state funds (for all programs) were cut by $166.8 million, or 2% of the total earnings of $8.3 billion. In fiscal year 2021, during the COVID-19 pandemic, the state cut $382.7 million (a 4% reduction from the total earnings of $8.8 billion). QBE earnings were fully funded in fiscal years 2019, 2020, and 2022. Additionally, the General Assembly approved a teacher pay raise of $3,000 for fiscal year 2020 and a $2,000 supplement for fiscal year 2022.
Findings and Recommendations

Finding 1: **GaDOE requires some best practices for referral and eligibility, but additional practices could be implemented to help ensure Gifted students are identified.**

GaDOE’s referral and eligibility requirements align with some best practices, but additional improvements could be made to increase Gifted identification across the state, particularly among underrepresented populations. To encourage systems to adopt these practices, GaDOE should include them in its guidance to school systems. Practices such as universal screening could be implemented as requirements, although this may require legislative action.

Gifted referral and eligibility processes serve to identify and place students who meet established criteria. In Georgia, this generally consists of referring a student based on performance and/or other characteristics (such as behavior displayed in classes or ability to perform above grade level expectations), performing additional screenings to determine the extent to which behaviors and performance align with Gifted characteristics, and then using criteria to test for eligibility (discussed on page 3). The requirements and guidance for referral and eligibility processes are outlined in GaDOE’s Gifted Resource Manual.

In fiscal year 2021, 13% of the student population was Gifted-eligible (including students found eligible in prior years). That year, 11% of students were referred for formal Gifted evaluation, with system referral rates ranging from 0% to 33%, as shown in Exhibit 5. Approximately 26% of the students referred in fiscal year 2021 met eligibility criteria, representing 3% of the total student population (though systems ranged from 0% to 14%).

**Exhibit 5**
**Referral and Eligibility Rates are Less than 10% in Most Systems (FY 2021)**

We excluded one system that reported it referred 95% of all students in 2021. Conversations with system staff revealed they had reported automatic referrals in a manner inconsistent with other systems’ reporting.

Source: GaDOE Student Record data
While implementing best practices may assist in ensuring Gifted students are identified, socioeconomic and other factors can impact rates significantly. For example, as student poverty levels increase, eligibility rates tend to decrease. Additionally, in Georgia and nationally, Asian and White students have higher representation in gifted programs, while other demographic groups are underrepresented. Finally, Georgia’s suburban school systems tend to have higher referral and eligibility rates when compared to rural or urban school systems.

The National Association for Gifted Children (NAGC), a national non-profit that supports the needs of gifted students, recognizes several best practices related to identifying potential gifted students. These practices are generally related to ensuring identification practices are expanded and students—particularly those in underrepresented populations—are not overlooked. Research indicates these best practices can improve referral and identification rates. As shown in Exhibit 6, most systems implement these practices either due to a GaDOE requirement or the system’s own discretion.

**Exhibit 6**

**Most Systems Implement Gifted Identification Best Practices**

<table>
<thead>
<tr>
<th>Required by GaDOE</th>
<th>Not Required by GaDOE</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>School systems are required to:</strong></td>
<td><strong>School systems are not required to, but most do:</strong></td>
</tr>
<tr>
<td>Have multiple objective &amp; subjective eligibility criteria</td>
<td>Utilize universal screening</td>
</tr>
<tr>
<td>Utilize multiple referral sources (e.g., teacher, parent, self, peers)</td>
<td>Conduct professional learning on identifying potential gifted characteristics</td>
</tr>
<tr>
<td></td>
<td>Begin identifying gifted students early</td>
</tr>
<tr>
<td></td>
<td>Provide students with multiple opportunities to demonstrate potential gifted characteristics</td>
</tr>
<tr>
<td><strong>School systems are not required to, and most do not:</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Provide parents and students information about the Gifted program in their preferred language</td>
</tr>
<tr>
<td></td>
<td>Utilize local norms</td>
</tr>
</tbody>
</table>

Source: DOAA survey to school systems; review of NAGC documents and GaDOE documents

Because GaDOE implements a policy of local control, it has few requirements related to identifying Gifted students. GaDOE does require systems to use multiple objective and subjective criteria (versus solely IQ) in determining eligibility; this cannot be waived under system flexibility. Additionally, systems must allow referrals to come from a variety of sources (including teachers, parents, and peers) or automatically, generally based on standardized test scores. Both practices expand the opportunity for students to be identified when they demonstrate gifted characteristics in different ways.

GaDOE does not require several other best practices, as described below. While these practices are not discussed in the Gifted Resource Manual, GaDOE staff indicated they provide assistance on these issues to systems upon request. We
found that systems implement these practices at varying rates.

- **Universal Screening** – The NAGC recognizes universal screening (i.e., requiring all students to be screened at least once in their academic career) as one of the most important tools in ensuring each student—particularly those in underrepresented groups—receives consideration. Unlike most (6 of 9) southeastern states we reviewed, GaDOE does not require the practice. However, universal screening is widely utilized across the state—93% (114) of the 123 local school systems surveyed report using the practice—and most of these systems (67%) screen students each year from 1st through 8th grade. The nine systems that reported not using the practice were all rural. GaDOE staff cited cost as a factor in some systems’ decision not to use it. However, given the prevalence of universal screening even among smaller systems, it is not unreasonable to require all systems to do it to ensure consistency across the state.

- **Professional Learning** – Because general education teachers are often the first to notice students’ abilities and behaviors, the NAGC recommends that all teachers receive training to identify potentially gifted students. Approximately 63% of surveyed systems (78) reported conducting this training. GaDOE also conducts voluntary professional learning sessions multiple times a year with Gifted coordinators across the state and encourages coordinators to conduct similar trainings with their local teachers.

- **Early Identification** – The NAGC states that “early identification in school helps improve the likelihood that [students’] gifts will be developed into talents.” In fiscal year 2021, approximately half of the newly recorded Gifted students statewide were identified in kindergarten through second grade, while 13% were identified in third grade. Nearly all systems with first time referrals beginning in third grade or later were rural. These systems also had higher poverty rates overall than systems beginning referrals in earlier grades (50% versus 33%).

- **Multiple Opportunities** – The NAGC recommends that systems ensure students have multiple opportunities to be tested for gifted eligibility. GaDOE allows school systems to determine how often students can (or should) be referred to gifted screenings, which is consistent with other southeastern states. Though not required, just over half of system survey respondents (72) indicated that students may be assessed in subsequent years if they are referred but found ineligible for Gifted services. We reviewed referral data of school systems from fiscal year 2017 to 2021 and found that approximately half of students who were referred but not found eligible were referred in subsequent years. Of these students, 30% were found eligible.

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9 We used the federal measure of Direct Certification to estimate each school system’s poverty level. Directly certified students include students living in a family unit receiving Supplemental Nutrition Assistance Program (SNAP) food stamp benefits, students living in a family unit receiving Temporary Assistance for Needy Families (TANF) benefits, and students identified as homeless, unaccompanied youth, foster, or migrant.
• **Preferred Language Communication** – To assist with identifying gifted students from different language backgrounds, the NAGC recommends that information and identification procedures are given in the preferred language of parents and students. Nearly 30% of surveyed systems (36) indicated they provide parents and students non-English materials and use tests that accommodate those whose primary language is not English. These systems generally had larger total enrollment and a higher percentage of English language learners. GaDOE staff indicated some systems may not have sufficient translators in their areas. It should be noted that federal law requires all school systems to determine a student’s primary language at enrollment, as well as whether that student is entitled to English language instructional programs. Approximately 8% of the state’s students were English learners in fiscal year 2022.

• **Local Norms** – According to the NAGC, using locally normed assessments for referrals may help identify gifted students in underrepresented populations; as such, they recommend re-norming to reflect percentiles based on local scoring. This practice is relatively limited among systems—28% of surveyed systems (34) reported using local norms, with the practice more prevalent among rural systems (34% compared to less than 10% of urban or suburban). One large suburban system stated using local norms is challenging when test scores vary significantly across the service area.

### RECOMMENDATIONS

1. The General Assembly should consider requiring school systems to implement universal screening.

2. Even if universal screening is not made a requirement, GaDOE should incorporate guidance into its Gifted Resource Manual.

3. GaDOE should assess whether other best practices for referral and eligibility should be incorporated into guidance or recommended for consideration as a requirement. If practices are included as guidance, GaDOE should describe the circumstances in which they may be relevant or could be implemented.

**Agency Response:** GaDOE partially agreed with the finding and noted that its gifted referral and eligibility processes are grounded in SBOE rules and state law.

**Recommendation 2:** GaDOE partially agreed with the recommendation, stating it would be committed to implementing the recommendation if it were

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**Note:** Of the 123 local school systems surveyed, 56 (46%) reported giving non-English materials to parents and students during the referral process, and 58 systems (47%) reported using a nonverbal or non-English test during the assessment process. Norm-referenced assessments compare an individual’s test results with those of a large group who took the same test. GaDOE requires systems to use nationally normed tests (i.e., compared to all students nationwide) for the Gifted eligibility determination to ensure consistent eligibility criteria statewide. However, local norms (i.e., compared to all students in a school, system, etc.) may be used for referrals.
“added in state law and with additional appropriated state funding.” GaDOE agreed that “universal screening could be included in the gifted resource manual as a best practice” if it is not required by state law.

**Recommendation 3:** GaDOE disagreed with the recommendation, stating that GaDOE’s Gifted eligibility and referral processes are grounded in SBOE rules and state law.

**Auditor Response:** GaDOE currently provides guidance to school systems regarding various Gifted best practices. Within the limits of current rules and statutes, GaDOE could assess additional best practices for Gifted identification and determine whether and how guidance on these practices should be provided.

**Finding 2:** GaDOE does not have adequate controls to ensure school systems meet requirements for QBE funding at the Gifted weight.

To receive funds at the Gifted weight, systems must ensure that students in Gifted classes meet the state’s eligibility criteria and are taught by a teacher with a Gifted endorsement. However, GaDOE does not have necessary controls to ensure that these requirements are followed. As a result, school systems have earned state Gifted funding for segments that appear to be ineligible.

State law requires school systems to report to GaDOE the program codes associated with each student’s six FTE instructional segments. Each program code identifies the instructional program (such as Gifted), which then dictates the funding weight for the FTE segment (e.g., a Gifted program code yields a funding weight of approximately 1.68). GaDOE oversees the data collection, and its system has more than 200 edit checks and business rules to ensure data reliability and consistency. For example, GaDOE maintains an edit check that notifies the submitter if key fields such as “School System” are not complete.

The Gifted program’s weight should be applied only when the student meets eligibility criteria and the class is taught by an endorsed teacher. Unlike other requirements related to the Gifted program, these cannot be waived under system flexibility and are easily tracked. However, GaDOE’s data system does not include controls to ensure they are met. As a result, the state lacks assurance that school systems are receiving the higher weight for only Gifted-eligible students who are taught by teachers with the appropriate training.

As described below, we found instances of ineligible students receiving Gifted services and of Gifted classes without a Gifted-endorsed teacher. In both instances, the school systems earned a higher FTE weight—and thus more QBE funds—than appropriate on behalf of students in those classes.
Ineligible Students Receiving Gifted Services

GaDOE policy requires school systems to follow GaDOE’s Gifted eligibility requirements and deliver state-funded Gifted services only to qualified students. As part of its annual data collections, GaDOE requires school systems to report which students have been identified as Gifted and their number of Gifted FTE segments.

In fiscal year 2021, 2% (3,800) of the approximately 195,400 students receiving at least one Gifted segment were not identified as being Gifted-eligible in GaDOE’s data (at least one segment in 90 local school systems and seven state charter schools). The issue was most prevalent among suburban systems, in which 2.6% of students with a Gifted segment were not identified as eligible (compared to 0.7% urban and 1.2% rural). Due to enrollment size, several suburban systems also had the largest share of ineligible Gifted students (for example, one suburban system had more than 1,200). The percentage of ineligible students identified by system ranged from 0% (in 90 systems) to 25%; three of the four with more than 15% were small rural systems, as shown in Exhibit 7.

Exhibit 7
Suburban Systems Had the Most Ineligible Students, but Rural Systems Had Higher Percentages (FY 2021)

<table>
<thead>
<tr>
<th>Number of Ineligible Gifted Students</th>
<th>Number of Systems by Percent of Ineligible Gifted Students</th>
</tr>
</thead>
<tbody>
<tr>
<td>Urban, 181</td>
<td>15%-25%</td>
</tr>
<tr>
<td>Rural, 672</td>
<td>10%-14.9%</td>
</tr>
<tr>
<td>Suburban, 2,851</td>
<td>5%-9.9%</td>
</tr>
<tr>
<td>&lt;5%</td>
<td>&lt;5%</td>
</tr>
</tbody>
</table>

1 The 90 systems with no ineligible students are not shown in this chart. Additionally, the chart only shows local school systems, so the seven state charter schools with ineligible students are not included.
Source: Analysis of GaDOE data

According to GaDOE staff, some systems may not be updating Gifted eligibility in their student records as required. We found that approximately 16% of the

12 The process and criteria for identifying Gifted students cannot be waived. For example, a system cannot qualify a student as Gifted using a lower threshold than GaDOE’s guidelines.
13 This number differs from others in the report because it describes the number of students with a Gifted FTE segment, versus those with a Gifted class.
ineligible students in fiscal year 2020 were recorded as eligible in 2021. While some portion of those students may have been initially deemed eligible in fiscal year 2021, it is possible others were also eligible during fiscal year 2020.

Regardless of the reasons for incorrect FTE categorization, systems still received a higher weight for all Gifted FTE segments—including segments for ineligible students. In fiscal year 2021, we estimate that systems earned an additional $3.6 million to fund Gifted FTE segments for students lacking a record of eligibility. Amounts for individual systems ranged from $178 to $1.6 million among the 97 systems. While overpayments to most (73) systems did not exceed $10,000, two systems received approximately $1 million and $1.6 million.

To ensure ineligible students are identified, GaDOE should implement controls in its data system. For example, the data system could flag and request an explanation for any student who does not have a record of eligibility when a school system includes one of their segments as Gifted. GaDOE’s annual audit of data integrity could also include a review of potentially ineligible students with Gifted FTE segments.

**Classes Taught by Teachers Without Endorsements**

To ensure that Gifted instruction is provided by teachers with appropriate training, GaDOE policy requires students with segments funded at the Gifted weight be taught by teachers with a Gifted In-Field Endorsement issued by the Georgia Professional Standards Commission (GaPSC). School systems must report teacher endorsement records and certificate records in GaDOE’s October and March data submissions. Because the type of necessary endorsement or certificate can vary by specific class, school systems are expected to report the requisite certificate or endorsement that allows that teacher to teach that class.

To determine the number of Gifted classes without a Gifted-endorsed teacher, we first used GaDOE’s data to identify all teachers associated with each Gifted class. We then documented whether those teachers had a record of a GaPSC-certified Gifted In-Field Endorsement to determine the percentage of classes by school system without any record of an associated Gifted-endorsed teacher. As shown in Exhibit 8, 10% (7,500) of the 76,600 Gifted classes in fiscal year

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14 Fiscal year 2020 represents the most recent fiscal year the analysis is possible. We did not have fiscal year 2022 data to determine the percentage of 2021’s ineligible FTEs that were recorded as eligible in 2022.

15 We estimated the overpayment by calculating the difference between the Gifted weight and the general education weight (at the applicable grade level) for the ineligible segments. We concluded it was more likely the students would have been funded in a general education program than a higher weight program such as Remedial Education or Special Education.

16 For example, a teacher who directly instructs three Gifted elementary school Mathematics classes and three general education Mathematics classes should have two different certificates listed: a Gifted In-Field Endorsement for the three Gifted Math classes and a Mathematics (K-5) Certificate or equivalent for the three general education Math classes.

17 While the requirement is related to FTE segments, we used GaDOE’s Class data because it includes the assigned teacher. However, we utilized FTE data to estimate the potential overpayment in FTE funding. See Appendix B for a more detailed discussion of methodology.

18 Due to data limitations with GaDOE data, our analysis was performed using additional GaPSC data received from GaDOE. For more information, please see the Objectives, Scope, and Methodology section in Appendix B.

19 This excludes AP and IB diploma classes that can earn Gifted FTE funding if the teacher has the required AP/IB training, as well as a 10-hour course on gifted services.
2021 lacked a Gifted-endorsed teacher. There was significant variation by system—the percentage of Gifted classes without an endorsed teacher ranged from 0% to 99%. Rural systems were more likely to have higher percentages without the endorsement. There were also other outliers, including one suburban system in which half of its Gifted classes (805 classes) were taught by teachers who lacked a record of a Gifted endorsement. Only 34 systems (approximately 20%) had all classes taught by an endorsed teacher.

Exhibit 8
Ten Percent of Gifted Classes Were Taught by Teachers Who Lacked the Required Endorsement (FY 2021)

Based on the October 2020 FTE count, we estimate\(^\text{20}\) up to $9.7 million may have been overpaid by the state for FTE segments tied to classes that lacked a Gifted-endorsed teacher. Among the 137 systems with Gifted classes taught by teachers who lacked a Gifted endorsement, this ranged from $178 to $1.5 million. While most (118) systems had potential overpayments less than $100,000, three had more than $1 million. It should be noted that 34 systems had all Gifted classes taught by Gifted-endorsed teachers and received no overpayments as a result.

School systems interviewed and surveyed indicated that resource constraints can be a significant barrier to teachers receiving a Gifted endorsement. Gifted endorsement programs generally require 9 to 12 hours of college-level course credit (up to 200 hours of coursework), which can be expensive for teachers. Some school systems offer their teachers stipends if they receive the endorsement, but teachers in systems without such programs must find other ways to pay for the endorsement. Our interviews indicated that rural systems with low enrollment in particular face difficulties in encouraging teachers to obtain the endorsement.

\(^{20}\) We estimated these amounts by determining the number of students in classes taught by teachers without the endorsement and their Gifted FTE segments to estimate how many segments appear ineligible. We then estimated the overpayment by calculating the difference between the Gifted weight and the general education weight (at the applicable grade level) for the ineligible segments. Because our analysis was limited to the first FTE count, we could not calculate the overpayment for fiscal year 2021 overall.
**FTE vs. Student Class Data Discrepancies**

During our analysis, we found that there are more Gifted FTE segments than Gifted classes in GaDOE’s data, which could indicate an inflated number of Gifted segments. Students’ FTE segments (used for funding calculations) and classes (used to document services received) are housed in two separate data sets, and there is no data control to tie all of a student’s reported Gifted FTE segments to their Gifted classes. (GaDOE does have a control to ensure each student with Gifted FTE segments has a record of at least one Gifted class.) According to GaDOE, underlying differences between the two data sets make tying FTE segments directly to Student Class records impractical, although other data checks could help address the discrepancies.

We identified two potential issues that increase the risk of inflated Gifted segments:

- **Gifted Course Scheduling** - As noted in Appendix B, each FTE data count occurs on a single day of classes (a Tuesday in October and a Thursday in March). If a school system schedules a full-day Gifted class on the weekday of the count, it receives Gifted funding for all six segments that day (with only one class record in the Student Class data), compared to a class that occurs five days a week that only receives Gifted funding for one segment (and also has only one class record).

- **No Gifted Class** - A school system could report a Gifted FTE segment that had no corresponding Gifted class, as long as that student had at least one Gifted class in the Student Class data. (For example, a student could have a segment for Honors Math and a segment for AP English in the FTE data but have only an Honors Math class and no AP English class in the Student Class data.) Due to data limitations, we could not confirm whether this issue actually occurred.

We estimate that these discrepancies led to potential excess funding of approximately $20 million. However, we were unable to determine what amounts were due to each of these issues.

Additionally, the use of teachers without a Gifted endorsement may have resulted from confusion over what provisions can be waived under system flexibility. While systems may waive teacher certification requirements generally, the Gifted teacher endorsement requirement cannot be waived for state-funded Gifted segments, according to written guidance from GaDOE’s Office of Policy, Flexibility, and External Affairs. However, Gifted program staff at GaDOE and multiple school systems indicated they thought the endorsement requirement could be waived.

To ensure funding weights are provided for classes with only a Gifted-endorsed teacher, GaDOE should implement controls to detect when discrepancies exist. It should be noted that GaDOE would need additional information from GaPSC to identify teachers without the endorsement. Our initial analysis using GaDOE’s data system resulted in a significantly higher percentage lacking the endorsement (57%), but this was due to incomplete teacher records.

**RECOMMENDATIONS**

1. GaDOE should implement controls in its data system to ensure that school systems only receive Gifted FTE funds for students who have met eligibility requirements.

2. GaDOE should implement controls in its data system to ensure that school systems only receive Gifted FTE funds for students taught by teachers with a GaPSC-certified Gifted In-Field Endorsement.

3. In its guidance to school systems, GaDOE should clarify what
provisions cannot be waived. For example, this language could be included in the Gifted Resource Manual.

4. GaDOE should explore options to address discrepancies between the FTE and Student Class datasets.

**Agency Response:** GaDOE partially agreed with this finding, indicating that it has added controls for the FY 2024 collections process. GaDOE further stated that “[t]he majority of the data collected for this audit represented the pandemic impacted school years.” It also noted that “gifted endorsement opportunities were limited” during the pandemic.

**Auditor Response:** The issues identified during our audit did not emerge during the pandemic, and the pandemic’s impact does not relieve GaDOE’s responsibility to implement data controls to ensure requirements are met for QBE funding. We considered potential impacts from the pandemic and obtained data from fiscal years 2017 through 2021 to address potential issues. Our analysis identified the same issues in the years prior to the pandemic, but we have included only the most recent year(s) to simplify reporting.

**Recommendation 1:** GaDOE partially agreed with the recommendation, indicating “districts cannot receive a gifted [FTE] segment unless the student is enrolled in a class with a gifted model reported for that student…Moving forward, starting in 23-24, the gifted eligibility date must be reported for all newly eligible students…If the student has an FTE segment code of T (Gifted) in FTE, the Gifted Eligibility Code will have to indicate that the student is gifted eligible.”

GaDOE also noted that “[t]he Gifted Eligibility application within the Statewide Longitudinal Data System (SLDS) provides an online method for submission and validation of testing protocols used to identify a student for entrance into the gifted program/services.”

**Auditor Response:** SLDS was not used for our analysis, and GaDOE does not use it to determine state QBE funding. Additionally, while SLDS does provide a system for recording Gifted student eligibility, it is not used by all school systems.

**Recommendation 2:** GaDOE agreed with the recommendation, indicating “GaDOE’s Technology Services division will work with the Policy, Flexibility, and External Affairs division to ensure the implementation of data collection controls in accordance with state law and agency approved board policy. GaDOE is engaged in a Data Modernization Initiative that is providing major updates to our collection and validation system. This will enhance the ability to add new flags and controls guided by state law and agency policy, including any new requirements pertaining to gifted education and gifted courses not taught by certified and/or gifted endorsed teachers.”

**Recommendation 3:** GaDOE agreed with the recommendation. “Per state law, LEAs can waive gifted certification but cannot earn [Gifted QBE] funding if the teacher of record is not gifted endorsed or certified. GaDOE will update its gifted manual to clarify this requirement and include this business rule.”

**Recommendation 4:** GaDOE partially agreed with this recommendation.
Finding 3: As currently implemented, Gifted services do not reflect the state’s QBE funding formula.

While the QBE funding formula anticipates higher costs for Gifted services, the services currently provided do not reflect the formula’s intent. Most school systems’ Gifted classes exceed the 1 to 12 teacher/student ratio upon which the Gifted funding weight is based. School system flexibility allows systems to waive maximum class size requirements, which frequently occurs due to resource constraints.

The Gifted program’s funding weight is higher than the funding weights for all general education programs primarily based on the expectation of 1 teacher for every 12 students. (Teacher/student ratio is the most significant factor in all QBE program weights.) As shown in Exhibit 9, this ratio is significantly smaller than the ratios for general education instruction—particularly in higher grade levels. As a result, the per-FTE cost for a Gifted student ranges from 30% to nearly 70% higher than the general education amount. The smaller class size is consistent with best practices because it helps ensure differentiation and more individualized instruction. However, the class size requirement can be waived under system flexibility.

Exhibit 9
Higher Gifted QBE Weight Assumes Smaller Classes (FY 2023)

<table>
<thead>
<tr>
<th>Teacher/Student Ratio</th>
<th>Gifted (All Grades)</th>
<th>Primary (1-3)</th>
<th>Upper Elementary (4-5)</th>
<th>Middle School (6-8)</th>
<th>High School (9-12)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>$4,880</td>
<td>$3,758</td>
<td>$3,012</td>
<td>$3,302</td>
<td>$2,897</td>
</tr>
</tbody>
</table>

Source: O.C.G.A. § 20-1-161 and GaDOE documents

GaDOE does not currently assess the extent to which Gifted class sizes reflect the funding formula’s intent. We were able to calculate Gifted class sizes using GaDOE’s Student Class data, which is a comprehensive record of all classes taken by students, as reported by school systems.
In fiscal year 2021, Gifted classes averaged 23 students per teacher. More than 77% of Gifted classes exceeded 12 students, with an average of 27 students per teacher. As shown in **Exhibit 10**, average system ratios were higher among the middle school grade levels, where Gifted classes averaged 26 students per teacher. Gifted classes in Grades 1-3 were most aligned with the funding formula—averaging 1 teacher for every 19 students.

### Exhibit 10
**Most Systems’ Gifted Classes Significantly Exceed 12 Students**

Some school systems were outliers in their number of students per Gifted teacher. One suburban system had an average of 37 students per teacher, while four state charter schools ranged from an average of 49 to 170 students per Gifted teacher. Using federal American Rescue Plan funding, GaDOE provided grants to 19 school systems, Regional Education Service Agencies, and higher education institutions.
teacher. (State charter schools are not shown in Exhibit 10, which focuses on local school systems.) State charter schools often teach virtually, which generally leads to larger class sizes, but we were unable to determine why other systems have significantly higher averages. GaDOE should use its data to identify systems with high ratios, investigate potential causes, and explore solutions.

When class sizes exceed expected ratios, the effectiveness of the higher funding weight is limited. As shown in Exhibit 11, the average class size is nearly twice the teacher/student ratio the Gifted funding is meant to achieve. As a result, the state is paying the higher rate for Gifted courses without generating the intended level of individualized instruction. Additionally, because the Gifted weight assumes consistent Gifted class sizes across all grade levels, the differential is even higher in the upper grade levels—where actual Gifted classes are approximately twice the expected size (see Exhibit 11). For example, high school grades receive $1,982 more per FTE for Gifted classes than general education; however, Gifted high school class sizes are more closely aligned with the general education program, which has a teacher/student ratio of 1/23.

Exhibit 11
Average Class Sizes Vary by Grade Level, but All Are Higher Than the Funding Ratio (FY 2021)

As previously discussed, class size requirements can be waived under system flexibility, and nearly all systems maintain this waiver. Systems may have larger class sizes due to limited resources and higher total enrollment, as discussed below:

- **Resource Constraints** – Gifted coordinators in surveyed school systems indicated that limited resources sometimes result in larger classes and not enough Gifted teachers. The state’s pay structure does not include a financial incentive for teachers to obtain a Gifted endorsement. While some systems may provide a stipend with local
funds, those with limited resources are unable to do so.

- **Enrollment Size** – We found that larger school systems tend to have larger Gifted classes. The 36 school systems with more than 10,000 students in fiscal year 2021 had Gifted classes with an average of 23 students per Gifted teacher, while 11 systems with less than 1,000 students had an average of 12 students per teacher.

It should be noted that nearly all eligible school systems also maintain Categorical Allotment waivers that allow them to use earnings from any QBE program (such as Gifted) to support other QBE-funded instructional programs, making it difficult to tie earnings to services. While the extent of this issue is unknown, the use of this waiver presents a risk that Gifted students are not being served with the totality of funds made available through higher program weights.

**RECOMMENDATIONS**

1. The General Assembly should consider the issues identified above in future discussions regarding program funding formula changes. For example, the General Assembly could consider adjusting the QBE Gifted weight based on grade levels.

2. GaDOE should periodically review Gifted class sizes and determine the extent to which they align with the intent of the state’s funding formula. When very large classes are identified, GaDOE staff should reach out to the local Gifted coordinator to determine causes and provide guidance.

**Agency Response:** GaDOE agreed but stated, “Georgia is a local control state, which allows school districts to choose which gifted service delivery model(s) best serve the students in the various grade bands. For all QBE categories, school districts earn funding based on a formula but are afforded flexibility per state law.” GaDOE also stated, “The 1-12 ratio is the formula for funding not the limit for the number in the class. Per legislative intent, ... local public-school systems may waive state-imposed class size requirements under system flexibility.” GaDOE also indicated that inaccuracies in the Student Class data may have caused outliers with very large class sizes.

**Auditor Response:** This finding is intended to highlight differences between the expectations for teacher/student ratios described in the state’s funding formula statute and the actual ratios as implemented under school system flexibility. While inaccuracies may have contributed to some outliers, they would have had a limited impact on the statewide information or on the overall finding.

**Recommendation 2:** GaDOE disagreed with the recommendation. “Class size waivers can be granted to approved Charter System, Strategic Waiver System, and state commission charter schools. The gifted education class sizes are listed in the current gifted resource manual, and there is also guidance that class size may be adjusted based on waivers per state law. Waivers removed the need for Data Collections to request this data.”
**Auditor Response:** It should be noted that GaDOE can still calculate class sizes with the data that it currently collects, and it provided the class size data used for our analysis. Additionally, while the state does not limit class sizes, very large classes could impact teachers’ ability to provide the specialized services intended by the state’s funding formula.

**Finding 4:** Depending on the model selected, systems may not sufficiently differentiate services for Gifted students.

While differentiation is recognized as a critical aspect of gifted education and is required by state regulations, the likelihood it occurs varies depending on the GaDOE Gifted model the system selects. Variation among the models has always existed, due primarily to classroom makeup or teacher qualifications. However, under system flexibility, systems can waive requirements related to the models (such as class sizes and curriculum assessments), which can impact differentiation.

The State Board of Education (SBOE) requires school systems to incorporate the principles of differentiation into their Gifted curricula and instruction. The National Association for Gifted Children (NAGC) defines differentiation as “modifying curriculum and instruction according to content, pacing, and/or product to meet unique student needs in the classroom” and recognizes it as a minimum standard that is necessary to meet the individual needs of gifted students. According to the NAGC, gifted students generally learn more quickly than other students of the same age and often need less practice to master concepts or to complete tasks, so differentiation is essential to supporting their continuous intellectual growth.

To facilitate differentiation, GaDOE offers eight Gifted delivery models that systems must use to instruct Gifted students. Systems have flexibility in which models (and how many) they decide to use. As noted on page 4, GaDOE’s Gifted Resource Manual outlines the requirements and curriculum expectations for each model (e.g., classroom makeup, teacher training). Some models—based on their requirements—help ensure more differentiation than others. However, because the level of differentiation—even within the same model—is ultimately dependent upon teachers’ classroom strategies, it is difficult to determine the extent to which differentiation occurs or is guaranteed based on the model selected.

**Exhibit 12** shows the percentage of Georgia’s 172,000 Gifted students with at least one class in a Gifted delivery model by school level (elementary, middle, and high school) during the 2020-21 fiscal year. Overall, Advanced Content was the most common delivery model, with 63% of all Gifted students enrolled in at least one class. Resource, Cluster, and Collaborative were also commonly used.

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21 This number differs from the 199,000 reported in the background because we excluded one large, suburban system (which accounted for 14%, or 26,900, of Gifted students) due to data reliability concerns. Nearly all of this system’s students were reported as only receiving Gifted services through the Innovative Model; however, system staff indicated the classes are actually closely aligned with other existing models. The exclusion of this system impacts the percentages reported for the models below.
Enrollment varied by school level—for example, Advanced Content was more common among middle and high school grades, while the Resource model was almost entirely used at the elementary level.

### Exhibit 12
Most Gifted Students Have at Least One Advanced Content Class¹ (FY 2021)

63% of all Gifted students had an Advanced Content class

1 We excluded Community Service Learning, Direct Study, and Internship/Mentorship models from this exhibit due to low usage.
2 AP and IB have been combined, but nearly all of these students are in AP classes. Both models are categorized as Advanced Content in GaDOE’s Gifted Resource Manual but are reported separately in the data.
3 We excluded all records associated with one large system that reports all Gifted classes as the Innovative model. System staff indicated they actually use the other delivery models found in GaDOE’s Gifted Resource Manual.

Source: Analysis of GaDOE Student Class data

While the NAGC acknowledges gifted students will spend much of their time in heterogeneous classrooms, it notes that differentiated instruction within these classes should not replace more intensive services for gifted students. As such, the NAGC recommends grouping gifted students with similar-ability students because this provides both academic and social benefits. Advanced Content classes, for example, group students based on performance and provide content that is inherently more advanced. Cluster and Collaborative models, however, are at higher risk of lacking differentiation because students may have a broad array of skills in the same classroom. Each model is discussed in more detail below.

- **Advanced Content, AP, and IB** – In an Advanced Content class, students are grouped by achievement and interest in a specific academic area (e.g., mathematics, foreign language). This includes Advanced Placement (AP) and International Baccalaureate (IB) programs for high school students. While Advanced Content classes often include Gifted and general education students, due to the criteria for enrollment, these classes are more likely to result in content differentiated from the general education curriculum.

Advanced Content classes are the most widely used of all the models—
63% (109,000) of the approximately 172,000 Gifted students were enrolled in at least one class in fiscal year 2021. The model is by far the most common used in middle and high schools. AP and IB (predominantly AP) were also common among high school Gifted students, with 65% enrolled in at least one class.

It should be noted that even though both Gifted and general education students are likely receiving the same instruction, school systems using these models receive significantly different funding for students in the same class under the state’s current funding structure. Gifted-eligible students are funded at the Gifted QBE weight (approximately 1.68), while the general education students are funded at the lower weight for their grade level. For high school FTEs, there is a nearly $2,000 difference between the Gifted per-FTE amount ($4,880) and the general education amount ($2,897).

- **Resource** – Resource is a “pull-out” model that focuses on interdisciplinary enrichment activities, rather than a single subject area. Under this model, students are often pulled out one day per week to receive Gifted instruction for that entire day. GaDOE requires Resource classes to only include Gifted students, which promotes differentiation to a greater degree because teachers can focus their instruction on the needs of Gifted students.

  The Resource model is used primarily in elementary schools, with more than 70% of Gifted elementary school students in at least one Resource class. It is rarely used in middle or high school (only 7% and 2% enrollment, respectively). Because Resource classes typically occur one day per week, many elementary schools also offer students other models.

- **Cluster Grouping** – Cluster Grouping places a group of identified Gifted students (GaDOE recommends 6-8 students) into an otherwise heterogeneous classroom of students where both groups are taught by the same teacher (who has a Gifted endorsement) using different lesson plans. According to GaDOE guidance, in a Cluster Grouping class, Gifted students receive differentiated instruction in the same classroom as general education students who—unlike Advanced Content—may not perform at the same level. According to the NAGC, gifted students in a Cluster Grouping class should be grouped together to receive differentiated instruction for a proportionate amount of the teacher’s time. Given the need to teach across all abilities and the large class sizes discussed in Finding 3, Cluster model teachers may have difficulty providing this level of differentiated instruction.

Cluster Grouping was the second most common model at the elementary level, with nearly 40% of Gifted elementary school students enrolled in at least one class. Systems that relied on Cluster Grouping more frequently had 19% fewer elementary Gifted-eligible students (on average) than systems using the model less frequently.
- **Collaborative Teaching** – Like Cluster Grouping, Collaborative Teaching involves placing Gifted students (GaDOE recommends no more than 8) in an otherwise heterogeneous class using different lesson plans. However, instruction is provided by the students’ regular classroom teacher (who does not need a Gifted endorsement) using collaborative lesson planning with a Gifted-endorsed teacher. According to the NAGC, even with the assistance of a gifted specialist, most general education teachers do not have the training to meet the needs of gifted students. As such, the risks to ensuring differentiation are higher in this model.

Across the state, 12% of students had at least one Collaborative Teaching class, including 18% of Gifted elementary schoolers and 13% of Gifted middle schoolers. The model was significantly less utilized at the high school level, with only 5% of students in a class using the model. As with Cluster Grouping, systems that use Collaborative Teaching more frequently have fewer Gifted-eligible students in the grades for which it is primarily used.

Multiple systems we interviewed indicated that they only use Collaborative Teaching when they do not have enough Gifted-endorsed teachers. However, this model requires that the participating Gifted-endorsed teacher have sufficient time to develop the lesson plans that help ensure differentiated instruction. Most Gifted-endorsed teachers were assigned 15 Collaborative classes or fewer; however, we identified those with higher class loads. In particular, 11 Gifted-endorsed teachers (in nine systems) collaborated on more than 60 classes at a time (up to 139 during a given academic term) during fiscal year 2021.

- **Innovative Model** – The Innovative Model differs from all other GaDOE models in being the least prescriptive with the fewest guidelines. Systems are given flexibility in developing innovative programs and must document how these models serve their Gifted students, but GaDOE does not review the models to determine the extent to which they ensure differentiation. While the lack of GaDOE guidance poses a risk, the model is infrequently used, and we did not identify significant problems with its implementation.

The Innovative Model is not common—only 31 systems had students enrolled in at least one class, and these represented a small percentage at each system, comprising 2% of Gifted students statewide. While they have broad flexibility in implementing the Innovative Model, systems appear to be using it for other accepted models, such as those used in other states. For example, three systems responding to our survey indicated they have a Gifted teacher “push in” to Gifted students’ regular classes rather than “pull out” the students into a separate class. Additionally, other systems indicated their Innovative Models were similar to other GaDOE models, such as having a Gifted-
endorsed teacher collaborate with a regular classroom teacher.

It should be noted, however, that one large suburban system records all of its classes as Innovative, though Gifted staff at that system indicated that actual instruction is generally aligned with the other GaDOE models. (This system was excluded from our analysis to avoid distorting actual model usage.)

**RECOMMENDATION**

1. GaDOE should periodically review its class data to identify anomalies that increase the risk of not ensuring differentiation (e.g., heavy reliance on a single model, high class loads for collaborating teachers). When outliers are identified, GaDOE should work with these systems to ensure differentiation is maximized.

**Agency Response:** GaDOE disagreed with the finding. “Georgia is a local control state, which allows school districts to choose which gifted service delivery model(s) best serve the students in the various grade bands.”

**Recommendation:** GaDOE disagreed with the recommendation, noting that SBOE regulations state that “local boards of education shall develop curricula for gifted students.” GaDOE indicated the Gifted Resource Manual provides service delivery model descriptions and discusses differentiation within the context of a Multi-Tiered System of Supports and Gifted Learner Guidance. However, GaDOE also noted that staff monitor delivery model data and could review “high class loads for collaborating teachers. However, this will not determine or guarantee whether sufficient differentiation is occurring in the gifted classrooms.”

**Auditor Response:** We agree that the state has a policy of local control and that GaDOE provides guidance regarding differentiation in its Gifted Resource Manual. However, neither of these prevent GaDOE from identifying higher risk scenarios and offering assistance to the applicable systems.
Finding 5: **Most Gifted-eligible students are taking at least one Gifted class.**

The differentiated instruction provided by Gifted classes helps Gifted students meet their full potential. More than 90% of Gifted students in Georgia are enrolled in at least one Gifted class during the academic year, though participation decreases as students move to upper grades. However, some students attend schools that do not provide Gifted classes; these typically have lower enrollment and higher poverty rates. Additionally, eight systems did not refer any students to the Gifted program in the years reviewed.

As previously discussed, best practices indicate that Gifted students should receive differentiated services to ensure continued intellectual growth is supported. This differentiation is reflected in the classes that follow certain models, as promulgated by GaDOE (see Finding 4 for a discussion of service delivery models). To determine whether Gifted students are enrolled in Gifted classes, we reviewed GaDOE enrollment data for students identified as Gifted-eligible during the 2019-20 and 2020-21 academic years.\(^{22}\)

Among the 193,090 Gifted-eligible students reviewed, 91% (176,000) were enrolled in at least one Gifted class in both academic years (12,536 were in a Gifted class in one of the two years, and 4,554 were not enrolled in either year). Percentages varied by grade level, as shown in Exhibit 13. For example, students in the lower elementary school grades—particularly kindergarten through second grade—were more likely to only receive services during the 2020-21 academic year, though this is likely because many of them were initially identified as Gifted in 2019-20. By contrast, those in the eighth grades during the 2019-20 academic year may have been enrolled in a Gifted class in the first year but did not remain in a Gifted class when they moved to high school.

\(^{22}\) We reviewed two years of eligibility data to account for and identify students who may have been identified as Gifted-eligible late in an academic year. These students would have been coded as Gifted but not enrolled in a Gifted class, which could inflate the number of Gifted students not enrolled.
Most Gifted Students Were Enrolled in at Least One Gifted Class (AY 2019-20 & 2020-21)\(^1\)

<table>
<thead>
<tr>
<th>Grade Level</th>
<th>Both Years</th>
<th>One Year</th>
<th>Neither Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>K</td>
<td>65%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1st</td>
<td>92%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2nd</td>
<td>93%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3rd</td>
<td>96%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4th</td>
<td>96%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5th</td>
<td>96%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6th</td>
<td>97%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7th</td>
<td>96%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8th</td>
<td>92%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>9th</td>
<td>89%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10th</td>
<td>86%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>11th</td>
<td>74%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

\(^1\) We reviewed students who were recorded as Gifted in both academic years. Grade level in this chart reflects the 2019-20 school year. For example, those in the 11th grade category were eligible in both the 11th grade (AY 19-20) and 12th grade (AY 20-21) and may have been in a Gifted class for one or both years, or neither year.

Source: GaDOE Class data

Gifted class enrollment decreased in the upper grade levels, likely due to the voluntary nature of the program. Survey respondents indicated students may opt out of the program for personal or academic reasons, or to pursue other opportunities. In particular, approximately 20% of students in the 11th or 12th grades during the two academic years were not enrolled in Gifted classes in one or both of the years reviewed.\(^2\) Approximately 48% of these students were instead enrolled in at least one dual enrollment class, which allows them to receive both high school and college credit for courses taken at a local college or university. It should be noted that, while dual enrollment is not recorded as a Gifted course, the NAGC and GaDOE indicate that it can provide differentiated instruction for Gifted students.

While most Gifted-eligible students are receiving Gifted services, some students are enrolled in schools that do not appear to offer any Gifted classes. Among the approximately 4,500 students who were not in a Gifted class in either year reviewed, 8% (351) were in 44 schools that provided no Gifted classes. Approximately 52% of the schools were high schools, compared to 25% elementary schools, 18% middle schools, and 5% schools serving all grade levels. In particular, 27% of the schools (12) were charter schools. Charter schools operate independently from local school systems, so they may not follow a

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\(^2\) This population includes the 20,895 Gifted-eligible students who were in the 10th and 11th grades and the 20,623 who were in the 11th and 12th grades during academic years 2019-20 and 2020-21. Of those, 8,172 (20%) did not have a Gifted class in one or both of the academic years.
system’s Gifted policies.

The schools with no Gifted classes had fewer students and higher poverty rates than those with Gifted classes. For example, schools without classes on average had less than half the enrollment of schools with Gifted classes. Additionally, the average Direct Certification\textsuperscript{24} rate—a metric of poverty level—of schools without Gifted classes was 53\%, compared to an average of 33\% among schools with Gifted classes.

In addition to eligible students who did not receive Gifted services, some students likely would have qualified but were never referred. We identified \(160\textsuperscript{25}\) of the state’s 2,306 schools, serving nearly 60,000 students overall, that referred no students in academic year 2020-21. It should also be noted that eight of the school systems (with a total of 43 schools serving approximately 3,900 students) had no referrals across the entire system, as well as 10 state charter schools (serving approximately 7,000 students). According to school system staff, remote learning during the pandemic impacted Gifted identification processes; however, four school systems had no referrals during the five-year period we reviewed. As noted on page 8, socioeconomic factors likely played a role; however, since gifted students can be found in all populations, there are likely unidentified students at these schools and systems who would have benefited from Gifted services.

**Agency Response:** GaDOE disagreed with the finding, stating “During the pandemic this should be a commendation that gifted services were maintained so that gifted students were receiving services to better meet their needs.”

**Auditor Response:** This finding is primarily informational, intended to describe the prevalence of Gifted services for eligible students. For this reason, it does not include any recommendations. However, we did note concerns related to the availability of services in some schools. While this issue affected a limited number of students, we believe it still warrants discussion.

\textsuperscript{24} We used the federal measure of Direct Certification to estimate each school system’s poverty level. Directly certified students include students living in a family unit receiving Supplemental Nutrition Assistance Program (SNAP) food stamp benefits, students living in a family unit receiving Temporary Assistance for Needy Families (TANF) benefits, and students identified as homeless, unaccompanied youth, foster, or migrant.

\textsuperscript{25} These schools included 122 in 55 local school systems, 10 state charter schools, 3 state schools (e.g., School for the Blind), and 25 schools at the Department of Juvenile Justice. Data was not available for the 2021-22 academic year.
### Appendix A: Table of Findings and Recommendations

<table>
<thead>
<tr>
<th>Finding 1: GaDOE requires some best practices for referral and eligibility, but additional practices could be implemented to help ensure Gifted students are identified. (p. 8)</th>
<th>Agree, Partial Agree, Disagree</th>
<th>Implementation Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 The General Assembly should consider requiring school systems to implement universal screening.</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>1.2 Even if universal screening is not made a requirement, GaDOE should incorporate guidance into its Gifted Resource Manual.</td>
<td>Partial Agree</td>
<td>FY 2024</td>
</tr>
<tr>
<td>1.3 GaDOE should assess whether other best practices for referral and eligibility should be incorporated into guidance or recommended for consideration as a requirement. If practices are included as guidance, GaDOE should describe the circumstances in which they may be relevant or could be implemented.</td>
<td>Disagree</td>
<td></td>
</tr>
</tbody>
</table>

| Finding 2: GaDOE does not have adequate controls to ensure school systems meet requirements for QBE funding at the Gifted weight. (p. 12) | | N/A |
|---|---|
| 2.1 GaDOE should implement controls in its data system to ensure that school systems only receive Gifted FTE funds for students who have met eligibility requirements. | Partial Agree | FY 2024 |
| 2.2 GaDOE should implement controls in its data system to ensure that school systems only receive Gifted FTE funds for students taught by teachers with a GaPSC-certified Gifted In-Field Endorsement. | Agree | FY 2024 |
| 2.3 In its guidance to school systems, GaDOE should clarify what items cannot be waived. For example, this language could be included in the Gifted Resource Manual. | Agree | FY 2024 |
| 2.4 GaDOE should explore options to address discrepancies between the FTE and Student Class datasets. | Partial Agree | FY 2024 |

| Finding 3: As currently implemented, Gifted services do not reflect the state’s QBE funding formula. (p. 18) | | N/A |
|---|---|
| 3.1 The General Assembly should consider the issues identified above in future discussions regarding program funding formula changes. For example, the General Assembly could consider adjusting the QBE Gifted weight based on grade levels. | N/A |
3.2 GaDOE should periodically review Gifted class sizes and determine the extent to which they align with the intent of the state’s funding formula. When very large classes are identified, GaDOE staff should reach out to the local Gifted coordinator to determine causes and provide guidance.

Finding 4: Depending on the model selected, systems may not sufficiently differentiate services for Gifted students. (p. 22)  

<table>
<thead>
<tr>
<th>Finding 5: Most Gifted-eligible students are taking at least one Gifted class. (p. 27)</th>
</tr>
</thead>
<tbody>
<tr>
<td>No recommendations</td>
</tr>
</tbody>
</table>
Appendix B: Objectives, Scope, and Methodology

Objectives
This report examines the Georgia Department of Education’s (GaDOE) Gifted program. Specifically, our review set out to determine the following:

1. Do local education agencies (LEAs) consistently identify and place Gifted students according to best practices?
2. Do LEAs consistently provide Gifted services according to best practices?

Scope
This audit generally covered activity related to Georgia’s Gifted Education Program from fiscal year 2017 to fiscal year 2021, with consideration of earlier or later periods when relevant. Information used in this report was obtained by reviewing relevant laws, rules, and regulations; interviewing staff from GaDOE and local school systems; analyzing data from GaDOE; surveying Gifted coordinators from school systems across the state; and examining gifted programs across nine other states in the Southeast. To identify best practices related to gifted identification and services, we reviewed guidance from the National Association on Gifted Children, examined research from various academic journals, and interviewed gifted education experts at the University of Georgia.

The following data sets from GaDOE were used to inform multiple objectives:

- **Full-time Equivalent (FTE) Data** – FTE data consists of information on the number and type of instructional segments (such as Gifted segments) per student, which are used to determine FTE counts. The state uses FTE counts as the basis for allocating Quality Basic Education (QBE) funds to school systems, as described on page 6. To be counted, a student must have attended class for at least one of the prior 10 school days before the FTE count date. The FTE count is submitted twice a year—October (cycle one) and March (cycle three)—and reflects the students’ state-funded instruction on the day of the FTE count. We obtained FTE data for both cycles in fiscal years 2017 through 2021 for all Gifted-eligible students and students with a referred for gifted referral in grades K-12.

- **Student Class Data** – Student Class data is a comprehensive record of class roster data that links students and teachers to a class. We used this data to determine how many students were receiving Gifted programming in a given year. School systems report this dataset three times a year: October (cycle 1), March (cycle 2) and June (end of year). We obtained student class data for all students who were identified as Gifted-eligible, who received a gifted referral, or who had a Gifted class for fiscal years 2017 through 2021.

- **Student Record Data** – This data includes student characteristics, demographics, and the services a student was eligible for that year, including if the student was eligible for or referred to Gifted services. The dataset includes information at the student, school, and system levels. We obtained all relevant student record data for Gifted-eligible students and students referred for gifted assessment from fiscal years 2017 to 2021. We excluded Student Safety Level Records, such as disciplinary events.

- **Certified/Classified Personnel Information (CPI) Data** – The CPI data contains personnel information, including certificates and endorsements, for school employees (e.g.,
teachers and administrators). We obtained CPI data for all teachers associated with a Gifted course from fiscal years 2017 to 2021. However, the CPI data GaDOE maintains in-house does not include all teacher endorsements, and teachers may have more than one. As a result, we requested additional data from GaDOE that it receives separately from the Georgia Professional Standards Commission (GaPSC). The GaPSC data has comprehensive information on teacher endorsements, so we used it to identify teachers without a Gifted endorsement. It should be noted that the GaPSC data includes non-renewable (i.e., temporary) Gifted endorsements, which are intended to allow teachers to teach Gifted classes while obtaining the endorsement.

For all datasets, we considered GaDOE’s controls, including business rules, over the data used for this audit and determined that the data used were sufficiently reliable for our analyses.

To compare geographic designations of school systems, we used the National Center for Education Statistics (NCES) to determine whether each local school system was considered to be urban, suburban, or rural. To avoid confusion with Georgia’s local city school systems, we used “urban” in place of NCES’s “City” designation.

In addition, we conducted a survey of local Gifted coordinators to gather more information about how school systems operate Gifted services. We sent the survey to every GaDOE-identified Gifted coordinator in the state across 177 school systems and 21 state charter schools. Three school systems did not have GaDOE-identified Gifted coordinators and were excluded from the survey. At the conclusion of the response collection period, we recorded an overall response rate of 70.2% (139 out of 198), including 85.7% across urban and suburban districts, 65.5% from rural systems, and 76.2% from state charter systems. Based on the response rate, we concluded that the responses received were sufficient to represent Gifted services across the state. In addition, we interviewed Gifted coordinators from 15 local school systems for more information on their identification practices and the Gifted services being provided.

When reporting data at the school system level, we excluded state charter schools due to their smaller enrollment size, which would have skewed data results. For example, in fiscal year 2021, the average number of Gifted-eligible students across 180 school systems when excluding state charter schools was approximately 1,205 students; the average among state charter schools was 76 students. We did include students in state charter schools when reporting on the statewide population, such as the percentage of students statewide that received Gifted services.

Government auditing standards require that we also report the scope of our work on internal control that is significant within the context of the audit objectives. All of our objectives address aspects of the GaDOE’s Gifted program internal control structure. Specific information related to the scope of our internal control work is described by objective in the methodology section below.

**Methodology**

To determine the extent to which LEAs consistently identify and place Gifted students according to best practices, we reviewed state law, State Board of Education (SBOE) rules, and GaDOE documents, such as the Gifted Resource Manual, to identify state guidance for how students should be referred and assessed. We interviewed GaDOE staff about gifted referral and testing practices. We reviewed and analyzed Student Record and Student Class data from GaDOE to determine how many students were referred and/or found eligible for Gifted programming at the statewide and system levels. We also examined GaDOE’s Student Record data for demographics of Gifted-eligible students.
To determine the extent to which LEAs consistently provide Gifted services according to best practices, we reviewed GaDOE’s Gifted Resource Manual to determine Gifted program policies and information from GaDOE’s policy unit to determine how waivers impact Gifted services. We interviewed GaDOE staff to identify requirements and guidance for delivering Gifted services, as well as to determine data controls for those practices, such as business rules for Gifted-related Student Record data. We examined GaDOE Student Class data to determine which teachers were associated with each Gifted class and which students were being served. We used this dataset to evaluate teachers’ Gifted endorsements (along with the CPI data), and the delivery models school systems used to deliver Gifted services. We used a separate analysis of this dataset provided by GaDOE to evaluate class size and Teacher/Student ratios. We used Student Record and FTE data to determine the number of ineligible students who received one or more Gifted FTE segments. To estimate potential overpayments, we calculated the difference between the QBE amount for a Gifted segment and a general education segment at the same grade level, multiplied the amount by the number of ineligible FTE segments for that grade level, and totaled the results. We concluded it was more likely the students would have been funded in a general education program than a higher weight program such as Remedial Education or Special Education.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.
## Appendix C: Gifted Eligibility Criteria

<table>
<thead>
<tr>
<th>Category</th>
<th>Option A</th>
<th>Option B</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Mental Ability</strong></td>
<td>Student must have a qualifying score in the mental ability AND achievement categories.</td>
<td>Student must qualify in three of the four categories.</td>
</tr>
<tr>
<td></td>
<td>Grades K-2 99th percentile composite score on a nationally age normed mental ability test.</td>
<td>Grades K-12 ≥ 96th percentile composite OR appropriate component score on a nationally age normed mental ability tests.</td>
</tr>
<tr>
<td></td>
<td>Grades 3-12 ≥ 96th percentile composite score on a nationally age normed mental ability test.</td>
<td></td>
</tr>
<tr>
<td><strong>Achievement</strong></td>
<td>Grades K-12 ≥ 90th percentile Total Reading, Total Math, or Complete Battery on a nationally normed achievement test.</td>
<td>Grades K-12 ≥ 90th percentile Total Reading, Total Math, or Complete Battery on a nationally normed achievement test.</td>
</tr>
<tr>
<td></td>
<td>Grades K-12 ≥ 90th percentile on composite score on a nationally normed achievement test.</td>
<td>Grades K-12 Superior product/ performance with a score ≥ 90 on a scale of 1-100, as evaluated by a panel of three or more qualified evaluators.</td>
</tr>
<tr>
<td><strong>Creativity</strong></td>
<td>Evaluation data required.</td>
<td>Grades K-12 Rating scales used to qualify student creativity must equate to the 90th percentile.</td>
</tr>
<tr>
<td></td>
<td>Grades K-12 Rating scales used to qualify student creativity must equate to the 90th percentile.</td>
<td>Grades K-12 Superior product/ performance with a score ≥ 90 on a scale of 1-100, as evaluated by a panel of three or more qualified evaluators.</td>
</tr>
<tr>
<td><strong>Motivation</strong></td>
<td>Evaluation data required.</td>
<td>Grades K-12 Rating scales used to qualify student motivation must equate to the 90th percentile.</td>
</tr>
<tr>
<td></td>
<td>Grades K-12 Rating scales used to qualify student motivation must equate to the 90th percentile.</td>
<td>Grades K-12 Superior product/ performance/ structured observation with a score ≥ 90 on a scale of 1-100, as evaluated by a panel of three or more qualified evaluators.</td>
</tr>
<tr>
<td></td>
<td>Grades 6-12 Two-year average of a 3.5 GPA on a 4.0 scale in regular core subject of mathematics, English/language arts, social studies, science, and full year world languages. (See p. 35-36 for additional information).</td>
<td></td>
</tr>
</tbody>
</table>

## Appendix D: QBE Instructional Programs, FY 2022

<table>
<thead>
<tr>
<th>Program</th>
<th>Number of FTEs</th>
<th>Per-FTE Cost</th>
<th>Program Weight&lt;sup&gt;1&lt;/sup&gt;</th>
<th>QBE Earnings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category IV Special Ed</td>
<td>13,630</td>
<td>$16,371</td>
<td>5.8684</td>
<td>$348,713,449</td>
</tr>
<tr>
<td>Category III Special Ed</td>
<td>65,460</td>
<td>$10,091</td>
<td>3.6173</td>
<td>$998,777,524</td>
</tr>
<tr>
<td>Category II Special Ed</td>
<td>9,942</td>
<td>$7,920</td>
<td>2.8390</td>
<td>$117,527,890</td>
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<tr>
<td>ESOL</td>
<td>29,302</td>
<td>$7,220</td>
<td>2.5880</td>
<td>$320,310,266</td>
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<tr>
<td>Category V Special Ed</td>
<td>15,481</td>
<td>$6,900</td>
<td>2.4733</td>
<td>$153,677,143</td>
</tr>
<tr>
<td>Category I Special Ed</td>
<td>25,521</td>
<td>$6,726</td>
<td>2.4111</td>
<td>$245,339,011</td>
</tr>
<tr>
<td>Kindergarten EIP</td>
<td>17,824</td>
<td>$5,766</td>
<td>2.0670</td>
<td>$142,285,330</td>
</tr>
<tr>
<td>Grade 1-3 EIP</td>
<td>57,516</td>
<td>$5,070</td>
<td>1.8174</td>
<td>$424,598,439</td>
</tr>
<tr>
<td>Grade 4-5 EIP</td>
<td>37,466</td>
<td>$5,054</td>
<td>1.8119</td>
<td>$276,331,775</td>
</tr>
<tr>
<td>Gifted</td>
<td><strong>113,442</strong></td>
<td><strong>$4,684</strong></td>
<td><strong>1.6790</strong></td>
<td><strong>$726,523,584</strong></td>
</tr>
<tr>
<td>Kindergarten</td>
<td>97,433</td>
<td>$4,664</td>
<td>1.6719</td>
<td>$599,485,148</td>
</tr>
<tr>
<td>Alternate Education</td>
<td>18,708</td>
<td>$4,150</td>
<td>1.4877</td>
<td>$99,320,588</td>
</tr>
<tr>
<td>Remedial</td>
<td>35,755</td>
<td>$3,786</td>
<td>1.3573</td>
<td>$190,232,457</td>
</tr>
<tr>
<td>Grade 1-3</td>
<td>273,108</td>
<td>$3,611</td>
<td>1.2945</td>
<td>$1,353,061,207</td>
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<tr>
<td>Vocational Labs 9-12</td>
<td>81,001</td>
<td>$3,301</td>
<td>1.1832</td>
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<tr>
<td>Middle School</td>
<td>313,743</td>
<td>$3,174</td>
<td>1.1378</td>
<td>$1,341,025,149</td>
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<tr>
<td>Grades 4-5</td>
<td>172,829</td>
<td>$2,898</td>
<td>1.0389</td>
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<tr>
<td>High School</td>
<td>352,153</td>
<td>$2,790</td>
<td>1.0000</td>
<td>$1,272,690,590</td>
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<tr>
<td><strong>Statewide Total</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>$9,623,347,574</strong></td>
</tr>
</tbody>
</table>

<sup>1</sup>Program weights shown are those set by GaDOE for fiscal year 2022. O.C.G.A. § 20-2-161 sets the weight for each program but allows GaDOE to vary the weights each year by up to 1.5% from the statutory weight, as needed.

Source: GADOE QBE Reports
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