



Advocates for Children of New York

Protecting every child's right to learn

May 16, 2016

BY EMAIL

Angelica Infante-Green, Deputy Commissioner for P-12 Instructional Support
New York State Education Department
89 Washington Avenue
Albany, NY 12234

Re: Comments on Proposed Career Development and Occupational Studies (CDOS) Graduation Pathway Option

Dear Deputy Commissioner Infante-Green:

Advocates for Children submits these comments in support of the proposed amendment of the regulations relating to the Career Development and Occupational Studies (CDOS) Commencement Credential. For more than 40 years, Advocates for Children has worked to promote access to the best education New York can provide for all students, including students with disabilities.

We support making the CDOS Commencement Credential available to *all* students. Based on our experience, limiting the CDOS Commencement Credential to students with disabilities has unfairly stigmatized those students who receive the credential and has forced students to disclose their disability to employers, whether or not they wish to do so. In addition, because the CDOS Commencement Credential has only been available to a small group of students to date, we are concerned that schools and districts have not invested sufficient resources to develop meaningful courses and work-based learning experiences leading to the achievement of a CDOS Commencement Credential. We believe that by making the CDOS Commencement Credential available to all students, schools and districts will be more committed to developing robust course and work-based learning opportunities for students interested in pursuing the CDOS Commencement Credential.

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In addition, we support making the CDOS Commencement Credential available to all students as a “plus one” option, in lieu of one of the five Regents exams required for high school graduation. We support providing students with increased flexibility to meet high school graduation requirements, while holding students to high standards, and believe that including the CDOS Commencement Credential as a “plus one” option is a step in the right direction.

However, the CDOS Commencement Credential as a “plus one” option will only provide limited relief to those students who have mastered New York State standards, but struggle to demonstrate their knowledge and skills on high-stakes standardized exams, since students still have to pass four Regents exams. In order to better meet the needs of the diversity of learners in New York State, we urge the New York State Education Department and the Board of Regents to take bolder steps away from the one-size-fits-all approach to high school graduation. Specifically, we recommend the following:

- (1) **Change the number of exit exams** required to graduate with a high school diploma. Currently, New York State has some of the most onerous testing requirements in the nation. We recommend that the State require only the English Regents, one Math Regents, and one Science Regents for graduation. Maintaining exam requirements in these subjects would give New York State the flexibility to use these assessments to comply with federal testing requirements. All other Regents exams would remain optional and available for students who choose to take them in order to graduate with a Regents Diploma with Honors or Advanced Regents Diploma. The number, types, and sequence of credits required to graduate would not be affected. Students still would have to fulfill the same course requirements to receive a high school diploma.
- (2) **Develop performance-based assessments**, which support a diversity of learning styles and goals while also maintaining a high standard of learning. Performance-based assessments should be offered to all students as options in lieu of the Regents exams.



Thank you for the opportunity to comment on the proposed amendment. If you have any questions about our comments or would like to discuss them further, please contact me at (212) 822-9514 or ksweet@advocatesforchildren.org.

Sincerely,

A handwritten signature in black ink that reads 'Kim Sweet'. The signature is written in a cursive, flowing style.

Kim Sweet
Executive Director

cc: Commissioner MaryEllen Elia
Board of Regents
Senior Deputy Commissioner Jhone Ebert