

Coalition for Multiple Pathways to a Diploma

Coordinator: Abja Midha • amidha@advocatesforchildren.org • 212-822-9502

May 3, 2016

BY EMAIL

Jhone M. Ebert, Senior Deputy Commissioner
New York State Education Department
89 Washington Avenue
Albany, NY 12234

Re: Comments on Appeals Process on Regents Exam Passing Score

Dear Deputy Commissioner Ebert:

The Coalition for Multiple Pathways to a Diploma submits these comments in support of the proposed changes to the requirements for appealing Regents exam scores. We are a state-wide coalition with more than 65 members, including advocates, teachers, administrators, parents and youth, representing a broad cross-section of students, including students with disabilities, English Language Learners (ELLs), and economically disadvantaged students. Members of the Coalition are united by the concern that high-stakes standardized exit exams are serving as a barrier to high school graduation for students who have otherwise mastered New York State standards and are college or career ready. We urge New York State to create multiple instructional and assessment pathways to a high school diploma, each of which holds all students to high expectations, provides them with quality instruction, and opens doors to career and post-secondary education opportunities.

We support expanding the score band for a Regents exam appeal from 62 to 60. We also support the elimination of the minimum attendance requirement. Based on our collective experience, we believe that the expansion of the score band and the elimination of the attendance requirement will allow more students, who have mastered New York State

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standards but struggle to demonstrate their knowledge and skills on high-stakes standardized exams, to graduate with a high school diploma and move on to postsecondary opportunities.

However, in order to make the appeal a more meaningful option for students who have mastered State standards, but struggle with high-stakes standardized tests, we recommend the following modifications to the requirements for an appeal:

- Reduce the number of times a student must fail a Regents exam in order to qualify for an appeal. Requiring students to attempt the exam twice causes students and schools to spend time and resources on test prep when they could be engaged in learning and mastering new material. Based on our collective experience, students who feel discouraged after their first attempt may give up on school altogether, which contributes to higher dropout rates.
- Allow students to appeal all Regents exams. The current limit on the number of exams that may be appealed unfairly disadvantages students who struggle to demonstrate their knowledge and skills on standardized tests, but have otherwise mastered State standards, as demonstrated through their classroom performance. Providing students with the opportunity to appeal all of the Regents exams will ensure that the Regents exams do not pose an unnecessary and unfair obstacle to graduation and postsecondary opportunities for students who are otherwise ready to move on to college or career.

The proposed changes to the requirements for a Regents exam appeal will provide increased flexibility within the current assessment system. However, the appeals process continues to operate within a one-size-fits-all framework that unfairly penalizes students who struggle on high-stakes standardized tests. In order to ensure that all students are given a fair opportunity to demonstrate their mastery of State standards, we continue to urge the New York State Education Department to develop performance-based assessments and make them available to students in lieu of Regents exams.

We also continue to urge the New York State Education Department to consider changing 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 the 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

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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.

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 Abja Midha at (212) 822-9502 or amidha@advocatesforchildren.org.

Sincerely,



Abja Midha
Coalition Coordinator

cc: Members of the Board of Regents
Commissioner MaryEllen Elia
Deputy Commissioner Angelica Infante-Green