

Coalition for Multiple Pathways to a Diploma

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March 7, 2016

BY EMAIL

Commissioner MaryEllen Elia
New York State Education Department
89 Washington Avenue
Albany, NY 12234

Re: Multiple Pathways Proposals

Dear Commissioner Elia:

We are writing in regards to the multiple pathways proposals that were presented at the January Board of Regents meeting. We thank you for resuming the State's discussion of multiple pathways to a high school diploma and appreciate the State Education Department's (SED's) efforts to move away from the one-size-fits-all approach to graduation requirements. As SED continues its review of alternative pathways to a high school diploma, we have several recommendations for your consideration.

Change the number of exit exams required to graduate

We urge you to consider a reduction in the number of exit exams required for a New York State 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 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.

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Expand the appeals eligibility criteria

We support the proposed expansion of eligibility criteria to qualify for an appeal. However, we recommend the following modifications in order to make the appeal a more meaningful option for students who have mastered State standards, but struggle with high-stakes standardized tests:

- 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 all together, 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.

With respect to the attendance requirement, we appreciate that the Regents and SED have expressed concern that the 95 percent attendance rate requirement might be unduly onerous and does not take into account life circumstances that may prevent students from maintaining that attendance rate in a given year, despite their best intentions. However, even with a reduction in the attendance rate, there will still be students who meet the other appeal criteria, but will not be able to meet the attendance cut-off. For example, students in temporary housing, students who are the parents of young children, students with full-time jobs, court-involved youth and students with serious illnesses may still not be able to meet a lower attendance requirement. In such instances, we recommend that districts be given limited discretion to waive the attendance requirement if students meet all of the other criteria for an appeal.

In addition, the attendance requirement does not take into account situations where students are taking and appealing Regents exams after completing the coursework required for graduation. Students in this situation should not be held to an attendance requirement in order to qualify for an appeal. We recommend that SED issue guidance to districts clarifying that the attendance requirement does not apply to students who are taking and appealing Regents exams after completing the coursework required for graduation.

We also recommend providing a similar expansion of the recently introduced appeal for students with disabilities who are working towards a local diploma, thereby allowing students who score a 50 or 51 on a Regents exam to appeal their scores and receive a local diploma.

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Provide Interim Options until Performance-Based Assessments are Developed

We support SED's efforts to develop a performance-based assessment option as an alternative to the Regents exams. However, given that the introduction of new assessments will take at least two years, based on SED's own estimates, we are worried that students who would otherwise be eligible to graduate now will not be able to benefit from a performance-based assessment option. For many of these students, the flexibility offered by the 4+1 pathway, the appeal, and the students with disabilities safety net is insufficient to meet their needs. As a result, we worry that these students will exit high school without a diploma and will not have access to meaningful postsecondary opportunities. Until a performance-based assessment option is in place, we recommend that SED identify interim options for this group of students. Specifically, we suggest offering a waiver that would involve comparing the classroom performance of a student who fails a Regents exam with the classroom performance of his or her peers who did pass the Regents exams. We recommend that SED review the experience of Massachusetts, which offers a waiver based on a comparison of classroom performance.

Improve Administration of Regents Exams

While SED is undergoing a review of multiple pathways to a diploma, we also recommend examining current practices for the administration of Regents exams. We recommend revisiting the schedule for the administration of Regents exams so as to minimize the likelihood that students have to take more than one exam per day. Based on our collective experience, for students who struggle with high-stakes standardized tests, having to take more than one exam per day significantly reduces their likelihood of success. In particular, students with disabilities and English Language Learners who have time extension accommodations should not be required to take more than one exam per day.

We also continue to hear reports of schools denying students the opportunity to sit for Regents exams when students are absent for more than a certain number of days. Given that passing the Regents exams is a distinct requirement not related to course credits and that the exams are only offered three times a year, students should be permitted to take Regents exams regardless of their attendance rate. We urge SED to issue guidance to districts prior to the administration of the June Regents exams so that schools do not continue to engage in this practice.

We thank you for your leadership on this issue. If you have any questions or would like to discuss the issue further, please contact Abja Midha at (212) 822-9502 or amidha@afcny.org.

Sincerely,



Abja Midha
Coalition Coordinator

cc: Members of the Board of Regents
Senior Deputy Commissioner Jhone Ebert

Deputy Commissioner Angelica Infante-Green