

Coalition for Multiple Pathways to a Diploma

Coordinator: Ashley Grant • agrant@advocatesforchildren.org • 212-822-9548

November 20, 2017

BY EMAIL

Chancellor Betty Rosa
New York State Board of Regents
89 Washington Avenue
Albany, NY 12234

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

Re: Comments on Proposed Amendment to Regulations Establishing a new Pathway to a HSE Diploma

Dear Chancellor Rosa and Commissioner Elia:

The Coalition for Multiple Pathways to a Diploma submits these comments in support of the New York State Education Department (NYSED) proposal to amend Section 100.7 of the Regulations of the Commissioner of Education (Section 100.7) to establish a new pathway to a New York State high school equivalency (HSE) diploma.

The Coalition is a state-wide coalition with more than 65 members, including advocates, teachers, administrators, parents and youth, representing a broad cross-section of students,

Advocates for Children of New York • Alliance for Quality Education • Annenberg Institute for School Reform • ARISE Coalition • Asperger Syndrome & High Functioning Autism Association • David C. Bloomfield, Esq., Professor of Educational Leadership, Law & Policy, Brooklyn College and The CUNY Graduate Center • Bronx Independent Living Services • Brooklyn Defender Services • Brooklyn Center for the Disabled • Business Teachers Association of New York State • Campaign for Tomorrow's Workforce • Capital Region Refugee Roundtable • Center for Independence of the Disabled, New York • Citizens' Committee for Children of New York • Lisa Finnerty Coggi, Parent/Advocate • Community Service Society • Council for a Strong America • Council of Family and Child Caring Agencies • Valerie DeClara, Parent • Della DeKay JD, EdD • Max Donatelli, Family Advocate • Irja Estrella, Parent • Families Together in New York State • Ann Marie Fitzpatrick, Parent • Flanbwayan Haitian Literacy Project • Jennifer Ghidui, Big Picture Learning • Michael Godino, Advocate • Good Shepherd Services • Roberta Grogan, Parent/Advocate • Lori Gummanow, Parent/Special Educator • Meghan Healy • Shelley Hubal, Parent • INCLUDEnyc • Muronji Inman-McCraw • Internationals Network for Public Schools • Lawyers for Children, Inc. • Learning Disabilities Association of New York State • Jill Lewis-Flood, Parent/PIP Member • Long Island Advocacy Center • Long Island Communities of Practice • Chris McNell, Special Education Supervisor/Principal • Diana Medina Mendez, Parent • Mark Anthony Mendez • Mental Health Association of New York City • Metropolitan Center for Research on Equity and the Transformation of Schools • Namita Modasra • New York Council of Administrators of Special Education • New York Immigration Coalition • New York Performance Standards Consortium • New York State Association for Bilingual Education • New York State Coalition of 853 Schools • New York State Community of Practice on Family, School and Community Collaboration • New York State Disabilities Advocacy Association and Network • New York State Independent Living Council, Inc. (NYSILC) • New York State Rehabilitation Association • New York State Teachers of English to Speakers of Other Languages (NYTESOL) • NY Stop Grad HST • Regina Paleau, Parent • Parent to Parent New York, Inc. • Evelyn Perez, Parent • Catherine Phillips-Russ, Baker Victory Services • Sharon Poole, Education for Everyone Consultant • Queens Community House • Lynn Russo, Parent • SCO Family of Services • Tracey Shannon, Parent • Bruce A. Shields, PhD, Associate Professor of Education, Daemen College • Sinergia Metropolitan Parent Center • Starbridge • United We Stand • Christian Villenas, PhD • Marcia Vogel, Parent/Advocate • YOUTH POWER!

Coalition for Multiple Pathways to a Diploma

Coordinator: Ashley Grant • agrant@advocatesforchildren.org • 212-822-9548

including students with disabilities, multilingual learners, and economically disadvantaged students. Our Coalition is united by the concern that high-stakes standardized exit exams serve as a barrier to high school graduation for students who have otherwise mastered New York State standards and are college or career ready.

We continue to 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 opportunities. The Coalition supports the proposed amendment to Section 100.7 because it creates an additional pathway to a HSE diploma for the many students who leave high school without a diploma under the current framework. As the Deputy Commissioners noted in their October 5, 2017 memo to the P-12 Education and ACCES Committees, more than 36,000 students who entered high school in 2011 and 2012 left school four years later without a diploma. However, more than 15,000 of these students had made significant progress toward a diploma by passing one or more Regents exams. We agree with the Deputy Commissioners that allowing New Yorkers to use passing Regents scores to earn a HSE diploma will encourage over-age and under-credited students to remain engaged in high school even if their circumstances do not allow them to complete high school before aging out of the school system.

We are pleased to see that the proposed amendment includes passing scores earned using the safety net and appeal provisions set forth in 100.5(d)(7)(i)(a),(b), and (c) to provide students with disabilities and multilingual learners with additional pathways to a HSE diploma. The Coalition urges the Board of Regents to make the following changes to allow all students who have made progress toward a high school diploma to apply their passing scores toward a parallel TASC subtest as they seek to earn their HSE diploma:

- **Include “compensatory safety net” passing scores.** We recommend that the proposed amendment be revised to allow students with disabilities to use passing scores as defined by 100(b)(7)(vi)(c), also known as the “compensatory safety net.” For example, this amendment would allow a student with a disability who has passed the English, Math, and Science Regents exams with scores of 66, 65 and 45, respectively, to substitute these scores for the corresponding Reading, Writing, Math and Science subtests of the TASC.
- **Include Approved Alternatives to the Regents Exams.** Currently, students who attend high schools within the New York Performance Standard Consortium can earn Regents diplomas by completing Performance Based Assessment Tasks (PBATs) in lieu of Math, History and Science Regents exams. It is not clear whether the proposed amendment would allow successfully completed PBATs to substitute for the corresponding TASC subtest. As such, we recommend that the Board of Regents clarify this issue to allow students who successfully demonstrated competency in Math, History or Science by

Coalition for Multiple Pathways to a Diploma

Coordinator: Ashley Grant • agrant@advocatesforchildren.org • 212-822-9548

completing a PBAT to substitute these PBATs for the corresponding TASC subtest to earn a HSE diploma.

Finally, we recommend that NYSED issue guidance to schools and families to ensure that students who remain eligible to attend high school are fully informed of their right to remain in school and are not pushed out of high school programs to pursue high school equivalency diplomas using this or any of the other HSE pathways.

Thank you for considering our comments. If you have any questions or would like to discuss our comments further, you can reach me at agrant@advocatesforchildren.org or (212) 822-9548.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ashley Grant', followed by a horizontal line.

Ashley Grant
Coalition Coordinator

cc: Members of the Board of Regents
Senior Deputy Commissioner Jhone Ebert
Deputy Commissioner Angelica Infante-Green
Deputy Commissioner Kevin G. Smith
RegComments@nysed.gov