

March 26, 2020

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

Dear Chancellor Rosa, Members of the Board of Regents, and Interim Commissioner Tahoe:

We write on behalf of the Coalition for Multiple Pathways to a Diploma to urge New York State to suspend any and all Regents exam graduation requirements for students otherwise eligible to graduate in 2020, except in cases where parents specifically request that their child not graduate so they can continue to attend school and attempt to meet these requirements in coming years.

Our coalition of more than 80 individuals and organizations, including educators, advocates, and parents from across New York State, firmly supports your decision last week to suspend most State assessments. We agree that during these unprecedented closures, schools need to be able to focus on providing continuity of learning, and directing efforts toward local school and community needs, rather than being concerned about helping students pass high-stakes tests. During these stressful and uncertain times, high school students --particularly those scheduled to graduate this summer -- also need to be able to focus on learning rather than worrying about whether they can pass the 4+1 Regents exams required for graduation. Research shows that locally-determined measures like GPA are better predictors of post-secondary success than are high-stakes tests.¹ Now more than ever, it is critical that educators have latitude to choose age-appropriate activities, assessments and projects that demonstrate their students' learning for the year, rather than teaching to exit exams.

This is a matter of equity. Across New York State, we are observing significant disparities in students' access to remote learning. Many students from rural areas and low-income homes do not yet have access to the technology or internet service they need to fully participate in remote learning. What is more, with schools closed, it is very difficult to provide many students, particularly English Language Learners and students with disabilities, with the targeted and individualized supports they need to prepare to pass high-stakes exams. Additionally, many private high schools do not require these tests for graduation and will award diplomas to students based on their completion of course requirements. Students in public schools across the State should have the same opportunity.

This is also an urgent matter of student engagement. We are concerned that without timely information about waiving exit exam requirements, older students, particularly ELLs and immigrant students who cannot imagine passing their last Regents exam without in-person supports, will drop out to focus on supporting their families economically, rather than finishing the last of their coursework through remote learning. With your swift action, we believe there is still time to keep these students engaged.

¹ www.advocatesforchildren.org/sites/default/files/library/diploma_coalition_regents_onepg.pdf

Whether or not New York State determines that administration of June Regents exams is technologically and administratively possible, we urge the Board of Regents to take emergency action to waive the exit exam requirements, Regulation 100.5(a)(4), for all students who have passed their required coursework and are otherwise eligible to graduate in 2020, unless a parent specifically requests that their child be allowed to remain in school to complete exit exam requirements. Waiving exit exam requirements does not require federal approval, as ESSA does not require states to tie state accountability assessments to graduation requirements. We urge you to quickly announce a plan to take action on this waiver so that students and educators can focus on maximizing remote learning rather than worrying about high-stakes tests.

We are requesting your *immediate* action to address the needs of students scheduled to graduate this year. However, we are also concerned that if it becomes necessary to cancel this summer's Regents exams, students in grades 8 through 11 will miss the opportunity to take required exams and may be forced to take high-stakes tests months after completing the course. The impact on these youth also needs to be considered. As SED and the Board of Regents move forward, over the next two years, with the critically important Graduation Measures initiative, we also urge you to consider other, more meaningful and rigorous ways for these students to demonstrate their college, career and civic readiness.

Please feel free to contact me with any questions or to discuss this recommendation further. We wish you and yours health and safety. Thank you for your leadership during these challenging times.

Sincerely,



Ashley Grant

cc: Governor Andrew Cuomo

New York State Senate Education Committee Chair Shelley Mayer

New York State Assembly Education Committee Chair Michael Benedetto

Advocates for Children of New York • Alliance for Quality Education • ARISE Coalition • Asperger Syndrome & High Functioning Autism Association • Big Picture Learning • David C. Bloomfield, Esq., Professor of Educational Leadership, Law & Policy, Brooklyn College and The CUNY Graduate Center • Bronx Independent Living Services • Bronx Defenders • Brooklyn Defender Services • Brooklyn Center for the Disabled • Bonnie Buckley, Founder Multiple Pathways to a Diploma For All • 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 • Citywide Council on Special Education, NYC • Lisa Finnerty Coggi, Parent/Advocate • Community Service Society • Council for a Strong America • Council of Family and Child Caring Agencies • Valerie DeClara, Parent • Amber Decker, Family Peer Advocate, Special Support Services • Della DeKay JD, EdD • Max Donatelli, Family Advocate • Eskolta School Research and Design • Irja Estrella, Parent • Families Together in New York State • Ann Marie Fitzpatrick, Parent • Flanbwayan Haitian Literacy Project • Jennifer Ghidui, Parent/Advocate • Michael Godino, Advocate • Good Shepherd Services • Roberta Grogan, Parent/Advocate • Lorri Gumanow, Parent/Special Educator • Meghan Healy • HERE to HERE • Rochelle Hoot, Special Education Administrator • Shelley Hubal, Parent • INCLUDEnyc • Muronji Inman-McCraw • Internationals Network for Public Schools • Jobs First NYC • Lawyers for Children, Inc. • Learning Disabilities Association of New York State • Legal Aid Society of New York • 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 • New York Council of Administrators of Special Education (NYCASE) • New Visions for Public

Schools • New York Immigration Coalition • New York Alliance for Inclusion and Innovation • 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 Teachers of English to Speakers of Other Languages (NYTESOL) • NY Stop Grad HST • NYU Metro Center • 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 • Amy Ming Tsai, Parent/Advocate for Special Education • United We Stand • Unity Preparatory Charter School of Brooklyn • Christian Villenas, PhD • Marcia Vogel, Parent/Advocate • YOUTH POWER!
