

November 19, 2021

BY EMAIL

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

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

On behalf of the more than 80-member Coalition for Multiple Pathways to a Diploma, we are writing regarding the updates shared at the October Board of Regents meeting about the State's plans to relaunch the Graduation Measures Initiative; to explore more effective modes of assessment, including performance-based assessments; and to examine barriers to equitable access to AP, IB, P-TECH and early college programs.

We were excited to hear Commissioner Rosa and Regent Young speak about changing New York State's assessment and graduation framework to move away from "deficit-oriented strategies and decontextualized mode of assessments toward formative assessments that are part of a coherent strategy to improve teaching and learning." We were also pleased to learn that the Department and the Board are relaunching the Graduation Measures Initiative. As you know, we think this work is critical and look forward to partnering with you as regional meetings resume.

We understand that the pandemic created unprecedented school and governance interruptions and that, as a result, it is necessary to extend the timeline for the Graduation Measures Initiative. We are also concerned that actionable recommendations are now expected three years later than originally planned.¹ After almost two years of interrupted learning and community trauma, students and teachers need to be supported in responding to urgent academic and socioemotional needs and cannot afford to spend time and resources preparing for high-stakes assessments that are neither valid nor meaningful indicators of college, career or civic readiness. Therefore, we are writing to share recommendations for balancing the need for research-based, stakeholder-informed, thoughtful deliberation with the urgent needs of today's high school students. As the Board and the Department move forward with this critical initiative, we ask that you take interim steps so that students do not have to wait until 2024 for meaningful change.

¹ <https://www.regents.nysed.gov/common/regents/files/Full%20Board%20Monday%20-%20Graduation%20Measures%20in%20New%20York%20State.pdf>.

Immediately decouple Regents exams from graduation.

Our coalition is united by the belief that when high-stakes standardized tests are used as exit exams, they create barriers to graduation for high school students who have otherwise mastered New York State standards and are ready for college or career. Moreover, as NYSED recently acknowledged, research shows that these types of assessments do not prepare students for postsecondary success.² As such, we recommend that the Board of Regents take immediate action to decouple Regents exams from graduation requirements while the State works to develop a more meaningful statewide assessment strategy.

Our proposed action is entirely within the Board's authority. Although New York State's Every Student Succeeds Act (ESSA) plan requires that high school students take Regents exams in ELA, math and science as a measure of *school accountability*, neither ESSA itself nor New York State's ESSA plan requires these tests to be tied to graduation. In fact, decoupling Regents exams from graduation would bring New York in step with the vast majority of states that use ESSA-mandated accountability assessments to measure school performance but not to determine individual students' eligibility for a diploma. Just as was the case during the 2020-21 school year, Regents exams can be administered to meet ESSA's *school accountability* requirements without the need to hold individual students accountable for passing high-stakes tests to graduate. We ask you to make this critical change immediately.

Over the next three years, increase transparency, gather information about New York's highest-need students, and prepare to make meaningful long-term change.

- **Prioritize the needs of students with disabilities and multilingual learners when examining and piloting programs.**

We appreciate that NYSED and the Board plan to examine equitable access to advanced courses and early college programs to identify barriers resulting in troublingly low participation among students of color. We are also concerned about low participation rates in each of these programs among students with disabilities and multilingual learners. Therefore, when examining equitable access, we ask that you also investigate barriers to participation for students with disabilities and multilingual learners in these programs, outcomes for students in these groups who do participate in the programs, and what supports need to be provided to teachers of AP, IB, Early College and P-TECH courses to support students with disabilities and those learning English.

We are also pleased that New York State plans to take a deep dive into performance-based assessments and to pilot regulations that will allow students to demonstrate readiness for Regents diplomas through more meaningful assessments. The importance of this work was made all the more apparent during the pandemic, when educators in our Coalition reported that without the need to prepare students to pass high-stakes standardized Regents exams, schools were able to utilize more creative and relevant means of assessing competency and mastery of State Standards. As the State examines existing and emerging school models that

²<https://www.regents.nysed.gov/common/regents/files/October%202021%20Meeting%20of%20the%20Board%20of%20Regents%20-%20SED%20and%20USNY%20C2%20A0Grant%20Updates.pdf>

utilize performance-based assessments, we urge the State to pay particular attention to the needs of students with disabilities and multilingual learners in these programs and what professional development and other supports are needed to fully include students with disabilities and multilingual learners in these more meaningful modes of learning and assessment.

- **Promote transparency by releasing interim reports and recommendations.**

As stakeholder feedback sessions resume in December and January, the State has an opportunity to gather information from the public about the long-term changes needed to make New York State a leader in college, career, and civic readiness. A key component of stakeholder engagement is sharing information about what is possible. When the Graduation Measures Initiative was launched in the fall of 2019, NYSED indicated that a literature review of research and practices in other states would be presented to the Board in February 2020, mid-way through the scheduled stakeholder meetings. We were pleased that, at the April 2021 Board meeting, NYSED reported that the literature review conducted by WestED was "ready to go" and would be presented for the Board to review in July or September 2021. We are eager to see a copy of the literature review as soon as possible to help inform stakeholder feedback and the ongoing work of the Graduation Measures Initiative. Moving forward, we also ask that NYSED provide regular, public updates on the pilot and research programs presented in October.

Thank you, again, for your leadership and for your commitment to rethinking teaching, learning and assessment of New York State students. We would welcome the opportunity to meet with you to discuss our recommendations. Please contact our coordinator with any questions or to schedule a meeting. We look forward to hearing from you.

Respectfully,



Ashley Grant

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 • Brooklyn Defender Services • Brooklyn Center for the Disabled • Business Teachers Association of New York State • Campaign for Tomorrow's Workforce • Capital Region Refugee Roundtable • Career Wise New York • Center for Independence of the Disabled, New York • Children's Aid • 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 • Eskolta School Research and Design • Irja Estrella, Parent • ExpandedED Schools • Families Together in New York State • Candida Figueroa, Teacher • Ann Marie Fitzpatrick, Parent • Flanbwayan Haitian Literacy Project • Jennifer Ghidui, Parent/Advocate • Goddard Riverside OPTIONS • 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 • JobsFirst • Lawyers for Children, Inc. • Learning Disabilities Association of New York State • April Leong Liberation Diploma Plus High School • Jill Lewis-Flood, Parent/PIP Member • Long Island Advocacy Center • 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 Immigration Coalition • New York Alliance for Inclusion and Innovation • New York Performance Standards

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