

Coalition for Multiple Pathways to a Diploma

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

November 9, 2015

BY EMAIL

Assistant Commissioner James DeLorenzo
New York State Education Department
89 Washington Avenue
Albany, NY 12234

RE: Comments on Proposed Amendment to Regulations regarding Graduation Requirements to Extend the Appeal Process for the Safety Net Local Diploma for Students with Disabilities

Dear Assistant Commissioner DeLorenzo:

The Coalition for Multiple Pathways to a Diploma submits these comments in response to the New York State Education Department (NYSED) proposal to extend the appeal process for the safety net local diploma for students with disabilities.

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, including students with disabilities, English Language Learners (ELLs), and economically disadvantaged students. We remain concerned that high-stakes standardized exit exams act as a barrier to high school graduation in New York State for students who have otherwise mastered New York State standards and are college or career ready.

The Coalition supports the extension of the appeal process for students with disabilities who are seeking to graduate from high school by accessing a safety net local diploma. However, in order to ensure meaningful access to the appeal, we recommend the following modifications to the proposed eligibility criteria:

- Reduce the attendance requirement to 90 percent. Based on our collective experiences working with students across New York State, a 95 percent attendance requirement is unduly onerous and does not take into account illness or other life circumstances that may prevent

Advocates for Children of New York • Alliance for Quality Education • Annenberg Institute for School Reform • Lynn Bass, Principal, Tapestry Charter High School • David C. Bloomfield, Esq., Professor of Educational Leadership, Law & Policy, Brooklyn College and The CUNY Graduate Center • Brooklyn Defender Services • Bronx Independent Living Services • BronxWorks • Brooklyn Center for the Disabled • Brooklyn Young Mothers' Collective • 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 • Council for a Strong America • Council of Family and Child Caring Agencies • Valerie DeClara, Parent • Robert Dodd, New York City Special Education Teacher • Irja Estrella • Families Together in New York State • Ann Marie FitzPatrick, Parent • Flanbwayan Haitian Literacy Project • Good Shepherd Services • Roberta Grogan, Parent/Advocate • Lorri Gumanow, Parent and Special Educator • Holly Gurnick, Parent • Shelley Hubal, Parent • Jill Lewis-Flood, Parent • Meghan Healy • INCLUDEnyc • Internationals Network for Public Schools • Lawyers for Children, Inc. • Learning Disabilities Association of New York State • Long Island Advocacy Center • Long Island Communities of Practice • Noreen Maher, Parent • Diana Mendez, Parent • Mental Health Association of New York City • Neighborhood Family Services Coalition • New York Council of Administrators of Special Education • New York Immigration Coalition • New York Lawyers for Public Interest • 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. • New York State Rehabilitation Association • New York State Teachers of English to Speakers of Other Languages • NY Stop Grad HST • Regina Paleau, Parent • Parent to Parent New York, Inc. • Queens Community House • Lynn Russo, Parent • Tracey Shannon, Parent • Iriss Shimony, Parent • Sinergia Metropolitan Parent Center • The Advocacy Center • United We Stand • Upward Bound • Metropolitan Center for Research on Equity and the Transformation of Schools • Marcia Vogel, Parent/Advocate • YOUTH POWER!

Coalition for Multiple Pathways to a Diploma

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

students from maintaining a 95 percent attendance rate in a given year, despite their best intentions; and

- Reduce the number of required attempts to attain a score of 55 or above from two to one. 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 experiences, students who feel discouraged after their first attempt may give up on school all together, which contributes to higher dropout rates.

Thank you for taking our comments into consideration. If you have any questions or would like to discuss these issues further, you can reach me at 212-822-9502.

Sincerely,



Abja Midha
Coalition Coordinator

cc: Chancellor Tisch Vice Chancellor Bottar Regent Tallon Regent Tilles
Regent Bendit Regent Rosa Regent Young Regent Cea
Regent Finn Regent Norwood Regent Cashin Regent Cottrell
Regent Brown Regent Chin Regent Ouderkirk Regent Johnson
Regent Collins Commissioner MaryEllen Elia
Deputy Commissioner Angelica Infante-Green