



THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK / ALBANY, NY 12234

TO: College and Career Readiness Working Group
P-12 Education Committee

FROM: John B. King, Jr.

SUBJECT: Potential Revision of High School Graduation Requirements

DATE: October 13, 2010

AUTHORIZATION(S):

SUMMARY

Issue for Discussion

What knowledge, skills, and dispositions should students have when they graduate from high school? Should our expectations be the same for all students? The Regents will discuss various possible directions for New York State's high school graduation requirements and how to prepare the next generation of New York's students for college and careers.

Reason(s) for Consideration

Review of Policy.

Proposed Handling

This question will come before a joint meeting of the College and Career Readiness Working Group and the P-12 Education Committee for discussion at the October 2010 meeting.

Background Information

In recent months, members of the College and Career Readiness Working Group and others on the Board have begun discussions regarding New York's high school graduation requirements in terms of how effective they are, both as a mechanism for maximizing all students' educational potential and as a signal to higher education

institutions and employers that New York's high school graduates are college- and career-ready. The New York State Board of Regents has been a leader in developing high school graduation requirements that reflect the best thinking of the times, and much has been learned from the experience of the last decade that can inform a reexamination of current policy.

New York's experience over the last decade, with the phase-out of the local diploma, has shown that student achievement could be increased significantly. New York had the second-highest gain in graduation rates of any state from 2003 to 2008, according to a study by the National Center for Education Statistics, and many more students have earned Regents diplomas than ever before. Yet a Regents diploma may no longer be the emblem of college-readiness that it once was. For high-achieving students, the Regents exams are reportedly much less important for college admissions than performance on Advanced Placement exams. For those students in the middle, far too many are found to require remediation in English language arts (ELA), math, or both when they enter college — despite having satisfied the State's increasingly rigorous high school graduation requirements. About a quarter of all freshmen in New York 2- and 4-year colleges require remediation. Moreover, the City University of New York (CUNY) has found that nearly 75 percent of its community college freshmen require remediation.

For some students, the new requirements have not been attainable; New York's graduation rates were still the 10th-lowest in the nation in 2008. Of all students who started 9th grade in 2005, 72 percent had earned a diploma after four years — and that percentage was only 48 percent in large city districts.

The conjunctive nature of the current requirements appears to be a significant barrier for many students. Data suggest that those students who did not graduate in four years were affected by different elements of the requirements. For example:

- Table 2 shows that across all Need/Resource Categories and racial and ethnic groups, many more students pass the required Regents examinations than graduate. For example, 73 percent of Hispanic students received passing scores on their required Regents exams, but only 60 percent graduated. Table 2 also shows that most students who take the required coursework pass the Regents exam. Indeed, as shown in Table 4, the vast majority of students who drop out never take the Grade 11 English exam because they never make it to Grade 11. These data suggest that, for thousands of students, the course requirements may pose more of an obstacle to graduation than the exams.
- Table 3 shows that across most Need/Resource Categories and racial and ethnic groups, fewer students pass the social studies Regents exams (at 55 or 65) than the English, math, or science exams. For example, only 46 percent of Black students in large city districts earned a 65 or better on the Global History and Geography exam, and only 51 percent earned a 65 or better on the U.S. History and Government exam, while 55 percent or more earned a 65 or better on each of the other three required exams. Similarly, only 47 percent of Hispanic students in

- Finally, Table 4 shows that most of the students who drop out do so before even taking all their required Regents exams. For example, in New York City, 84.6 percent of students who dropout of school never took the 11th grade English Regents exam; 7.4 percent of dropouts took the exam but didn't pass; and a total of 8 percent of dropouts scored 55 or better on the exam. Further research is needed to unpack the implications of these data in order to determine the extent to which New York's graduation requirements may have factored into students' decisions.

Policy Directions for Consideration

What knowledge, skills, and dispositions should students have when they graduate from high school? Should our expectations be the same for all students? To provide a starting point for the Regents' discussion, this memorandum describes various possible directions for New York State's high school graduation requirements:

- A. Increase graduation requirements
- B. Allow increased flexibility in the ways students can meet requirements
- C. Offer alternative or supplemental credentials
- D. Rethink the "safety net" for students with disabilities

Note that these categories are not mutually exclusive. For example, the Regents could decide to increase graduation requirements while simultaneously allowing increased flexibility in the ways students can meet graduation requirements. Note, also, that any change in requirements could be phased in (or out). This memorandum describes a few alternatives in each category and then discusses some examples of how increased requirements could be combined with increased flexibility. These alternatives are at different stages of exploration, and – to reiterate – this memo is intended to provide a starting point for the Regents' discussion about how to prepare the next generation of New York's students for college and careers.

We begin with a review of current graduation requirements and plans for phasing out the local diploma.

Summary of Current Requirements and Phase-Out of Local Diploma

To earn a **Regents diploma**, students are currently required to earn 22 units of credit (four each in English and social studies, three each in math and science, two in physical education, etc.) and score 65 or above on five Regents exams (one English, one math, one science, and two social studies exams) or approved alternatives. Table 1A

shows that, of the students who entered grade 9 in 2005, 68 percent of students statewide earned a Regents diploma in four years, compared to only 39 percent of students in large city districts did.

To earn a **Regents diploma with Advanced Designation**, students must earn at least 22 units of credit (with extra requirements in either a language other than English, career and technical education (CTE), or the arts) and score 65 or above on a minimum of 7 to 9 Regents exams (depending on the year in which they entered grade 9).

A local school district may award a **Regents diploma with honors** (or a Regents diploma with Advanced Designation with honors) to a student who achieves an average score of 90 on all Regents examinations required for the diploma.

To earn a **local diploma** (being phased out, but still available to general education students who entered grade nine in 2005, 2006 and 2007 and to certain students with disabilities), general education students are required to earn 22 units of credit and pass the five required Regents exams. Passing scores on the Regents exams range from 55 to 65 or above, with the exact number of exams on which students must earn a 65 or above depending on the year in which they entered grade 9.¹ As shown in Table 1A, 9 percent of those general education students who entered grade 9 in 2005 earned a local diploma, but that percentage was higher in large city districts.

Students who complete an approved school district or Board of Cooperative Educational Services (BOCES) CTE program may earn a Regents diploma or Regents diploma with Advanced Designation [8 NYCRR §100.5(d)(6)(ii)]. Such students must meet the general requirements for a Regents diploma (22 units of credit and passing scores on five required Regents exams). In addition, one unit each of the required credit in English, science, and math, and the combined unit of economics and government, may be fulfilled through specialized courses, integrated CTE courses, or a combination of specialized and integrated CTE courses. To earn a technical endorsement on a Regents diploma or Regents diploma with Advanced Designation, students must also successfully complete a technical assessment [8 NYCRR §100.5(d)(6)(ii)(b)(2)].

A. Increase Graduation Requirements

We could seek to improve the college- and career-readiness of our high school graduates by increasing (i) the number of course credits required to graduate or (ii) the Regents exam requirements. This section describes a handful of ways in which either of these might be done.

¹ The current safety net policy provides that students with disabilities can meet the testing requirements for a local diploma either by earning a score of at least 55 on the five required Regents exams (for those students who entered grade nine in or after September 2005) or by passing the corresponding Regents Competency Tests (for those students with disabilities who entered grade nine in or after September 2001 and prior to September 2011 and who fail required Regents examinations for graduation) (see 8 NYCRR §100.5(b)(7)(vi)).

Consider the fact that large numbers of New York’s high school graduates arrive in college with inadequate math skills, requiring remediation. Why is this, and what can be done about it? Researchers have found that *the greatest predictor of college success is the academic intensity and quality of high school course-taking.*² Many colleges and universities publish guidelines recommending, among other things, that high school students complete four years of math prior to entering college.³ Yet New York’s high school students are currently required to complete only 3 years of math — and often do so by the end of grade 10 or 11. Therefore, the Board of Regents might consider **requiring four years of math** for high school graduation.

High Schools That Work (HSTW), a school improvement initiative with more than 1,200 sites in 30 states (including New York), recommends a challenging curriculum to prepare students for further education and the workplace. In particular, HSTW recommends that schools using block schedules require four years of science.⁴ In order to ensure that all of New York’s students have access to careers in the science, technology, engineering, and math (STEM) fields that are so vital to our economy, the Regents could consider **requiring four years of science** instead of the current three.

The Regents could consider going further and **adding three required credits – a 4th year of math, 4th year of science, and a “college and career readiness” credit**, which could be fulfilled by passing one of four types of courses:

- a career and technical education (CTE) course (this option might only be available to a student who completes an approved CTE program)
- a college course
- an advanced course, such as those for which the Department has approved an alternative assessment pursuant to 8 NYCRR §100.2(f) (e.g., an Advanced Placement (AP) course (including earning a score of 3 or better on the corresponding AP exam) or an International Baccalaureate (IB) course (typically available only in schools that offer the complete 2-year IB diploma program)).

By comparison, HSTW recommends that each student pursue either a career/technical concentration (four courses) or an academic concentration (including at least 1 AP, IB, or college-credit course). Another model is followed in Texas, where students in “recommended” and “advanced” high school programs must successfully complete a total of 26 high school credits, including four years each of math, science, and English. In addition, the “college and career readiness” credit would provide an opportunity for students to have academic experiences that would support development of dispositions necessary for success in college and careers.

² Clifford Adelman, *The Toolbox Revisited: Paths to Degree Completion from High School through College* (Washington, D.C.: U.S. Department of Education, 2006), p. 145.

³ John Garvey, “Are New York City’s Public Schools Preparing Students for Success in College?” (Providence, R.I.: Annenberg Institute for School Reform, 2009), p. 8.

⁴ *High Schools That Work: An Enhanced Design to Get All Students to Standards*, p. 5
http://www.isbe.state.il.us/career/pdf/enhanced_brochure.pdf

Rather than – or in addition to – increasing course requirements, the Board of Regents could strengthen exam requirements, either by changing the required exams or by raising cut scores. For example – perhaps in conjunction with an increase in the number of required math credits – the Regents could **require that students pass a second Regents exam in mathematics** in order to graduate from high school. This second math exam could replace one of the other required exams, or it could be added as a 6th required exam.

The research that supported the Board of Regents’ decision to raise proficiency cut scores on the Grades 3-8 English language arts and math assessments this past summer included several analyses that associated college readiness with cut scores of between 75 and 85 on the Regents exams. This raises the question whether the Board of Regents might wish to consider **increasing the required passing scores on the English and math Regents exams to a level that is associated with college-readiness** (i.e., 75 or 80 on the current scale). To earn a Regents diploma, students would be required to:

- earn 22 units of credit;
- pass one English and one math Regents exam with a score that is associated with college-readiness, phased in as follows:

Year entered 9th grade	Required passing score
2011	70
2012	75
2013 and later	80

- pass all remaining required Regents exams with a score of 65 or above.

Alternatively, the Board might wish to **create a new state-level credential that recognizes higher achievement across five subjects** (similar to the Regents diploma with honors that districts may currently offer). To earn a “Regents College- and Career-Ready diploma,” students would be required to earn 22 units of credit and pass all five Regents exams with a higher score (75 or 80 on the current scale).

There is more than one way that such a credential could be implemented. One way would be to phase it in for all students, just as the requirement that all students earn a Regents diploma is currently being phased in. Another possibility would be to create two new credentials: a College- and Career-Ready diploma and a Basic diploma. To graduate with a Basic diploma, students would be required to earn a certain number of units of credit (possibly with different distribution requirements or even a lower total number than the current 22) and score 65 or above on five required Regents exams.

The Board could also consider legislative recommendations that would **extend the school day/school year**. Among international competitors, the United States has one of the shortest school years. On average, schools around the world are in attendance 200 days per year⁵. Students in Japan and Germany attend approximately 240 days per year⁶.

	instructional hours per year ⁷
United States	799
Finland	861
Netherlands	911
Japan	926
Korea	1079

"Proponents of Extended Day and Extended Year point to international comparisons. They often refer to data from the 2003 Trends in International Mathematics and Science Study (TIMSS) or data from the OECD Programme for International Student Assessment (PISA). These studies showed that U.S. students scored lower on various tests in math and/or science and that U.S. schools required fewer instructional hours than a number of other countries, including Japan, Finland, Korea, and the Netherlands." (<http://rer.sagepub.com/content/80/3/401.full>)

Discussion of Increasing Graduation Requirements

New York's experience over the last decade, with the phase-out of the local diploma, has shown that student achievement could be increased significantly. New York had the second-highest gain in graduation rates of any state from 2003 to 2008, according to a study by the National Center for Education Statistics, and many more students have earned Regents diplomas than ever before. It is likely, therefore, that **more students could earn more credits or attain college-ready Regents exam scores if they were required for graduation.**

For some students, however, New York's new graduation requirements have not been attainable; New York's graduation rates were still the 10th-lowest in the nation in 2008. The data in Tables 1A and 1B suggest that if we were to set higher passing scores on Regents exams, **overall graduation rates could be dramatically reduced in high-need, low-resource communities** — at least when the new standard was first implemented. The third column from the right in Table 1A shows that, of the students who entered grade 9 in 2005, only 49 percent were able to score a 75 or above on the English and math Regents exams and a 65 or above on the three other required Regents

⁵ Rebekah Bickford and David L. Silvernail, *Extended School Year Fast Facts* (University of Southern Maine: Center for Education Policy, Applied Research and Evaluation, 2009)

⁶ Richard G. Neal, *Extended School Day and Year are Under Review Across the Country* (The Heartland Institute: School Reform News, 2008)

⁷ Elena Silva, *On the Clock: Rethinking the Way Schools Use Time* (Washington, D.C.: Education Sector, 2007)

exams; in large city districts, the corresponding figure was only 18 percent. While future accountability requirements of a reauthorized Elementary and Secondary Education Act are as yet unknown, increasing high school graduation requirements may result in **increases in the percentage of high schools and districts that are identified for improvement** or even more aggressive interventions.

If New York were to require more course credits for graduation, many **districts would likely have to hire additional teachers** in those subjects. Unless the increased requirements were accompanied by additional funding, they would be subject to criticism as an unfunded mandate. Another potential consequence is that high schools offering innovative programs would be constrained because **students would have less flexibility in their schedules**.

Ultimately, the **Regents Reform Agenda** is the response to the performance challenge:

- Adopting internationally-benchmarked standards and assessments that prepare students for success in college and the workplace.
- Building instructional data systems that measure student success and inform teachers and principals how they can improve their practice.
- Recruiting, developing, retaining, and rewarding effective teachers and principals.
- Turning around the lowest-achieving schools.

Now that the Board of Regents has moved to align assessment cut scores with college- and career-readiness benchmarks, they may want to consider aligning the scaling and cut score system for the Regents exams (currently on a scale of 0 to 100) with the system that is used for the Grades 3–8 tests.

- Reporting Regents exam results in terms of performance levels, as the Department currently does with Grades 3-8 test results, would help students, parents, and educators understand whether students are on track to college- and career-readiness.
- The Department's Technical Advisory Group has suggested that scoring the Regents exams on a scale such as the one currently used for the Grades 3-8 tests would facilitate the Department's efforts to measure student achievement growth and track student progress through our testing program from grades 3 through 11.
- This change would also allow us to create assessments that have a wider breadth of questions, both in format and difficulty, to allow students at all levels to be assessed at their highest level of achievement.

B. Allow Greater Flexibility in Meeting Graduation Requirements

To further the goal of maximizing each student's educational potential, the Board of Regents might wish to consider allowing increased flexibility in how students can meet graduation requirements. This section lists several examples.

Two possibilities would be to **(1) allow students choice in one or more of their five required Regents exams, and (2) allow the successful completion of a CTE technical assessment (as part of an approved CTE program) to substitute for one of the five required Regents exam.** By comparison, England, for example, has a two-stage examination system in which almost all 16-year-olds take examinations in English, math, and science, as well as a half dozen or so other academic or CTE subjects of their choosing; and 18-year-olds who wish to attend university typically take Advanced Level exams in their choice of 3 or 4 subjects.

The Regents might also wish to consider **allowing students to earn credits through demonstration of competency rather than seat time.** Currently, students are required to receive direct instruction for 108 hours in order to earn a unit of credit (8 NYCRR §100.1). For many students, however, this amount exceeds what is needed to demonstrate mastery in a given content area.

- Pursuant to 8 NYCRR §100.5(d)(1), students may earn up to 6.5 credits by earning a score of at least 85 or its equivalent on a State-developed or State-approved assessment (in addition to passing an oral examination or a special project to demonstrate proficiency), in either core or non-core subjects. Under 8 NYCRR §100.5(d)(9), however, students may only earn three units of elective credit via independent study. The Board of Regents might wish to consider expanding availability of independent study to more than three credits.
- One of the key questions with respect to **seat time flexibility** is how best to ensure that students have the “opportunity to learn.” A system of formative and interim assessments could be one strategy for addressing this question.
- The Regents could also consider regulatory changes that would allow CTE students to earn credits by demonstrating industry standards, as many of these are skill-based measures that do not contemplate seat time.
- **Virtual and online learning** is an increasingly popular option in many schools, and the Department continues to work with the field to develop capacity and understanding around the requirements for this medium of instruction.

Another option would be to **increase the maximum number of academic credits that students can earn through integrated CTE programs and specialized CTE courses.** Currently, students may earn a maximum of four academic credits – one each in English, mathematics, science, and economics and government – through an integrated CTE program, specialized CTE courses or a combination of specialized and

integrated CTE courses (8 NYCRR §100.5(d)(6)(ii)(a)(2)). Typically, students take traditional academic courses in their home schools in grades 9 and 10 to prepare for their required Regents examinations, then they can choose to fulfill some of their subsequent academic course requirements with integrated or specialized CTE courses.

When a BOCES offers integrated academic courses, this affords BOCES-based CTE students the convenience of fulfilling academic credits at the BOCES without needing to travel back and forth to the home high school. Specialized courses, by comparison, are typically offered by local high schools. They can include subjects such as Anatomy and Physiology (science), Avionics (mathematics), Business Communications (English), and Health Care Policy and Economics (economics and government).

If the regulations were modified to allow students to fulfill more than four academic credits through integrated and specialized CTE courses, CTE students would have more choices as to where and when they could fulfill their credit requirements. In addition, the demand for BOCES and LEAs to develop integrated and specialized CTE courses would increase.

Finally, the Regents might want to **provide flexibility in the courses that students may take in middle school**. Currently, New York's regulations prescribe in detail the courses that students must take in grades 7 and 8. Furthermore, students may only earn diploma credit in grades 8 and above (see 8 NYCRR §100.4(d)). Although districts may apply for flexibility in how they organize middle school coursework, those avenues are so restrictive that only a handful of districts have ever taken advantage of them.

Current regulations limit the ability of middle school students to earn diploma credit by taking high school level courses tailored to their different ability levels. So, for example, a student who is ready for higher level mathematics and prepares for and passes a Regents exam in an earlier grade may fulfill the assessment requirement but does not earn a unit of diploma credit. The regulations also limit opportunities for students to pursue innovative courses and programs that could increase engagement and advance learning, such as service learning programs and interdisciplinary courses in the science, technology, engineering, and mathematics (STEM) fields.

There are numerous ways in which the regulations could be modified to enable middle schools to increase innovative program offerings and to enable students to pursue pathways that are tailored to their needs and interests:

- Allow students who have demonstrated readiness to begin fulfilling graduation requirements in grades 6 and 7;
- Allow students who want to take additional courses in the core academic subjects (i.e., advanced or remedial courses) to postpone taking one or more of their non-core courses until high school;
- Allow schools to use advanced curriculum models in middle school;

- Allow schools to design and offer courses that integrate academic requirements into STEM or service learning programs (similar to high school CTE integrated courses);
- Allow schools to design interdisciplinary courses that fulfill requirements more quickly - for example:
 - Students could take an interdisciplinary course combining the subjects of Health and Home & Career Skills by the end of grade 8 or;
 - Students could take an interdisciplinary course that would satisfy requirements in both Technology and another required subject such as science, math or art;
- Allow schools to design delivery models to infuse career awareness, career planning, and financial literacy into subjects beyond the required introductory CTE courses of Technology and Home & Career Skills, thus promoting vertical alignment with high school CTE programs.

Discussion of Increasing Flexibility in How Students Can Meet Graduation Requirements

Any increase in flexibility should build in safeguards for students. First, changes should be designed to ensure increased opportunities for students, rather than opening a loophole for schools to eliminate instruction in non-core courses. In addition, schools must provide instruction that is appropriate and tailored to student needs; otherwise, for example, “wholesale acceleration” could push students into higher-level math courses before they are ready, which could result in student frustration and disengagement.

C. Offer alternative or supplemental credentials

At their January 2010 meeting, the Board of Regents supported staff’s recommendation to begin developing a **Career Skills Credential** that would document a student’s achievement against the Career Development and Occupational Studies (CDOS) Learning Standards. Any student could pursue this credential as a supplement to the regular high school diploma, and, for some students with disabilities, it would replace the current individualized education program (IEP) diploma. This idea emerged from a series of public discussions that the Regents and the Department held in 2008 and 2009 regarding the IEP diploma, as well as from the CTE Future Directions Initiative recommendations that students’ CTE achievement should be documented. The following description reflects input gathered from employers, parents, educators, and others, as well as information on the credentials offered in other states and countries, gathered by staff from the offices of Special Education and Career and Technical Education.

- The supplemental credential would be available to any student, provided that the student is graduating with a regular high school diploma, completes a Career Plan and has documentation upon graduation that he or she has, in accordance with the Career Plan (or for students with disabilities, the transition activities in his or her IEP), participated in service learning, instructional, and work-experience programs and has achieved the CDOS standards.

- The alternative credential could be offered to students with disabilities who have fulfilled the requirements for the credential and have attended at least 12 years of school (excluding Kindergarten), but, because of the significant challenges of their disability, are unable to graduate with a regular diploma.

Stakeholders have commented that such a credential:

- Strengthens existing requirements and policy relating to career planning, transition planning and annual guidance meetings;
- Could motivate students with disabilities to stay in school longer to work toward a regular diploma, knowing that they could also exit with this credential;
- Could enable students' community- and work-based learning and experience to be valued and documented;
- Would likely lead to increased opportunities for all students to participate in work-based learning experiences, community-based work experiences, and service learning programs and engage in coursework that is integrated, relevant and meaningful to their preparation for employment or continuing education and training.

Because the credential would be available to all students, it would have more value to employers than an IEP diploma. Moreover, because the credential would document students' skills and experiences, it would be of value to employers when they consider hiring students and recent graduates for entry-level positions.

D. Safety Net for Students with Disabilities

While the local diploma is being phased out for general education students, it remains available to students with disabilities through the "Safety Net" provisions of State regulations. Most students with disabilities who are provided appropriate special education supports and services to participate and progress in the general education curriculum should be able to graduate with a regular high school diploma – and, indeed, the percentage of students with disabilities graduating with a Regents diploma after four years has increased from 38 percent in 2005 to 44 percent in 2009. However, most students with disabilities who graduate with a regular diploma continue to rely on the safety net to graduate with a local diploma. Furthermore, as Table 5 shows, the percentage of students with disabilities who do not even take Regents exams within four years is still quite high – ranging from 35 percent for the math and Global History exams to almost 43 percent for U.S. History.

Under current regulations, for those students with disabilities who do not earn a Regents diploma, there are two alternative routes to meet testing requirements for a local diploma: the Regents Competency Test (RCT) Safety Net and the 55-64 passing score on Regents examinations.

- The RCT safety net allows students with disabilities who first enter grade 9 in or after September 2001 and prior to September 2011 and who fail one or more of the required Regents examinations (i.e., English, Mathematics, Science, Global History and U.S. History) to meet the testing requirements for the local diploma by passing the corresponding RCT(s) (8 NYCRR §100.5(b)(7)(vi)). The RCT safety net was put into place when the Regents raised the standards for all students in the 1990's and required Regents level content courses for all students. The RCT safety net was designed to provide time for districts to redesign and strengthen their programs for students with disabilities and prepare them for Regents courses. Given the substantial number of years that it has been in place, we are not recommending any change to current regulation whereby the current RCT safety net will sunset.
- The 55-64 passing score option provides an additional safety net for students with disabilities who first enter grade 9 in September 2005 and thereafter may meet the local diploma requirements by achieving a passing score of 55-64 on any Regents examination required for graduation (8 NYCRR §100.5(b)(7)(vi)).

Options for Consideration

As the Regents discuss possible changes to graduation requirements for all students, the Regents should consider how a student with a disability who can pass his/her course requirements but, because of the challenges of his/her disability, cannot achieve the requisite score on a Regents examination in a particular content area can graduate with a regular diploma. Following are some possible options, or combination of options, for Regents consideration:

55-64 Pass Score Option

- Repeal the 55-64 pass score option for students with disabilities and phase in an increase in the pass score over a period of time. For example, raise the required pass score from 55 to 65 for all five Regents examinations or for specific Regents examinations (e.g., English and Math) or for a specific number of Regents examinations (e.g., any 3 out of 5) over a three- to five-year period.
- Retain the 55-64 pass score option permanently or for a specified period of time (e.g., available to students with disabilities entering grade 9 prior to September 2015) for all five Regents examinations.
- If the scoring metrics are revised for high school exit exams (e.g., Level 1 to 4), reset the safety net required level of achievement for students with disabilities.
- Identify substitute assessments that could be used to demonstrate that a student with a disability has met the proficiency requirement in a particular content area.

Credits/Courses

- If general education graduation course requirements are increased, allow students with disabilities to graduate with a Regents or local diploma based on fewer or substituted course requirements (such as a career and technical education sequence to count towards certain STEM requirements). For example, under current regulations, certain students with disabilities may be exempted from the Language other than English requirements, but they must still earn the same number of credit hours as required for all students in order to graduate with a Regents diploma (see 8 NYCRR §100.5(b)(7)(iv)(g)).

Diploma Options

- Continue to offer the local diploma option only for students with disabilities. (This would likely result in schools not receiving credit for graduating these students under federal accountability standards.)
- Eliminate the local diploma option and the safety net exceptions for students with disabilities by requiring that all students meet the regulatory standards for a Regents diploma.
- If the diploma options for all students are expanded, determine possible safety net exceptions for students with disabilities based on the specific requirements for each diploma option that would represent an equivalent standard.

Overall Discussion

Raising standards is a necessary, but not sufficient, condition for improving the performance of the entire P-16 system. Each element of the Regents' reform agenda—strengthening standards and assessments, putting in place a statewide curriculum, creating a world-class data system, redesigning teacher and leader preparation, and turning around persistently low-performing schools—has a critical role to play.

As noted at the outset of this memo, options for revamping New York's graduation requirements should be considered in terms of two criteria: how well they enable all students to maximize their educational potential, and how well they signal to higher education institutions and employers that New York's high school graduates are college- and career-ready. It is possible that some combination of higher standards and increased flexibility would further both goals simultaneously. For example:

- The Board of Regents could increase the number of required credits, but provide flexibility to earn those credits through demonstration of competency rather than seat time;
- The Board could increase the passing Regents exam scores for English and math, while at the same allowing students choice (including the possibility to substitute a

- The Board could maintain something similar to the current Regents diploma requirements, but rename the credential the “Basic diploma” to acknowledge that students who squeak by on their English and math Regents exams are often not considered ready for credit-bearing freshman coursework without remediation. At the same time, they could create a college- and career-ready credential, the “Regents College- and Career-Ready Diploma,” for those students who are able to earn Regents exam scores in the range that colleges say they associate with college readiness. Combining this option with student choice on one or more of their Regents exams (including the possibility to substitute a CTE assessment) would likely yield higher graduation rates than the status quo because it would offer students more flexibility in meeting their Regents exam requirements. If the Regents were to reduce the number of units of credit required for the Basic diploma or add more flexibility to the credit distribution requirements, that would likely raise graduation rates as well.

In considering these issues, the Regents should bear in mind that, beginning in 2014-15, New York is scheduled to begin administering annual examinations in grades 3-11 English language arts and mathematics developed by the PARCC consortium. These assessments will be internationally benchmarked and aligned with the common core standards, and the grade 11 examinations are intended to measure college and career readiness. These new exams could potentially be factored into future graduation requirements.

Next Steps

The policy directions outlined in this memo are at different stages of exploration and development. With the support of the Regents, staff will continue to engage representatives of employers, parents, students, educators and administrators in developing these ideas.

Three ways to encourage a statewide conversation on college and career readiness policy options might be:

1. Hold **regional hearings** around the State. The Board of Regents would convene regional hearings in each of their Judicial Districts. These public hearings would provide feedback on impact, sustainability, capacity and timelines.
2. Convene **panel discussions** in each Joint Management Team region. Such conversations could be complemented by systematically soliciting written input from particular stakeholder groups. For example, the Department could invite

3. Conduct a **statewide survey** for use by P-12 educators, higher education and industry. The Regional Educational Laboratory or the New York Comprehensive Center might be able to assist in surveying a sample of higher education institutions or faculty.

We propose to come back to the Regents with a more detailed set of proposals, informed by stakeholder feedback and additional research, in early 2011.

Attachments

Diploma Requirements for Students Entering Grade 9
Program Requirements for the Middle Grades
New York State Career and Technical Education
A New Standard for Proficiency: College Readiness

**Table 1A. Regents Examination Performance as of June of the 4th Year of High School
General Education Students in the 2005 Total Cohort as of June 2009
All Public Schools**

	General Education Students in 2005 Total Cohort	% Cohort Earning Regents or Local Diploma	% Cohort Earning Regents Diploma (including Advanced Designation)	%Cohort Earning Local Diploma Only	% Cohort Scoring 65-100 on 5 Required Regents Examinations *	% Cohort Scoring 75-100 on ELA and Mathematics Regents Examinations, Scored 65-100 on Remaining 3 Required Regents Examinations	% Cohort Scoring 75-100 on 5 Required Regents Examinations	% Cohort Scoring 80-100 on 5 Required Regents Examinations
New York City Public Schools	66,625	64%	50%	14%	52%	29%	19%	6%
Large City District	7,323	54%	39%	15%	38%	18%	11%	3%
High Need Urban/Suburban Districts	14,266	68%	59%	9%	60%	34%	23%	8%
High Need Rural Districts	12,272	81%	73%	8%	72%	49%	36%	13%
Average Need Districts	62,039	86%	81%	4%	82%	63%	49%	22%
Low Need Districts	29,530	95%	90%	5%	93%	79%	69%	37%
Total State	192,764	77%	68%	9%	69%	49%	37%	16%

* To meet Regents diploma requirements, a student must pass 5 Regents examinations with a score of 65 or higher and earn 22 units of credit. Some students shown in this column met the minimum examination requirements for a Regents diploma, but lacked the necessary units of credit. Some students may also have arrived in New York State late in their high school career and may not have had to pass all Regents Exams.

Total cohort counts for All Public Schools and Needs to Resource Capacity Category Groups include all students, including students who were enrolled for less than 5 months.

**Table 1B. Regents Examination Performance as of June of the 4th Year of High School
General Education Students in the 2005 Total Cohort as of June 2009
Large City Districts**

	General Education Students in 2005 Total Cohort	% Cohort Earning Regents or Local Diploma	% Cohort Earning Regents Diploma (including Advanced Designation)	% Cohort Earning Local Diploma Only	% Cohort Scoring 65-100 on 5 Required Regents Examinations *	% Cohort Scoring 75-100 on ELA and Mathematics Regents Examinations , Scored 65-100 on Remaining 3 Required Regents Examinations	% Cohort Scoring 75-100 on 5 Required Regents Examinations	% Cohort Scoring 80-100 on 5 Required Regents Examinations
Yonkers City School District	1,666	65%	46%	19%	47%	24%	16%	4%
Syracuse City School District	1,216	50%	34%	16%	35%	16%	11%	4%
Rochester City School District	2,432	47%	29%	17%	28%	12%	6%	1%
Buffalo City School District	1,843	61%	50%	10%	47%	21%	14%	4%

* To meet Regents diploma requirements, a student must pass 5 Regents examinations with a score of 65 or higher and earn 22 units of credit. Some students shown in this column met the minimum examination requirements for a Regents diploma, but lacked the necessary units of credit. Some students may also have arrived in New York State late in their high school career and may not have had to pass all Regents Exams. Total cohort counts for Yonkers, Syracuse, Rochester and Buffalo City School Districts include students who were enrolled in the district for 5 months or more.

Table 2. Graduation Rate and Percentage Meeting Minimum Assessment Requirements for Local Diploma* as of June of the 4th Year of High School (General Education Students in the 2005 Total Cohort as of June 2009)

Asian/Pacific Island Students in the 2005 Total Cohort

	Asian/Pacific Islander	Students Scoring 65-100 on 2 and 55-100 on 3 Regents	% of Students Earning Regents or Local Diploma
New York City Public Schools	10,615	89%	79%
Large City Districts	245	83%	76%
High Need Urban/Suburban Districts	395	84%	73%
High Need Rural Districts	86	90%	84%
Average Need Districts	1,537	94%	89%
Low Need Districts	2,463	98%	95%
All Public Schools	15,353	91%	82%

Black Students in the 2005 Total Cohort

	Black	Students Scoring 65-100 on 2 and 55-100 on 3 Regents	% of Students Earning Regents or Local Diploma
New York City Public Schools	22,191	73%	60%
Large City Districts	3,856	62%	50%
High Need Urban/Suburban Districts	4,464	76%	64%
High Need Rural Districts	384	76%	66%
Average Need Districts	3,447	86%	73%
Low Need Districts	1,264	93%	87%
All Public Schools	35,966	74%	62%

Hispanic Students in the 2005 Total Cohort

	Hispanic	Students Scoring 65-100 on 2 and 55-100 on 3 Regents	% of Students Earning Regents or Local Diploma
New York City Public Schools	24,724	71%	57%
Large City Districts	1,626	64%	52%
High Need Urban/Suburban Districts	3,270	73%	57%
High Need Rural Districts	389	73%	63%
Average Need Districts	4,035	83%	70%
Low Need Districts	1,900	90%	83%
All Public Schools	36,162	73%	60%

White Students in the 2005 Total Cohort

	White	Students Scoring 65-100 on 2 and 55-100 on 3 Regents	% of Students Earning Regents or Local Diploma
New York City Public Schools	8,617	86%	79%
Large City Districts	1,529	74%	62%
High Need Urban/Suburban Districts	6,090	85%	77%
High Need Rural Districts	11,219	89%	83%
Average Need Districts	52,715	94%	88%
Low Need Districts	23,834	98%	96%
All Public Schools	104,116	93%	87%

* Minimum assessment requirements for a local diploma based on scoring at or above 65 on two of the required assessments and at or above 55 on the remaining three.

**Table 3. Regents Examination Performance as of June of the 4th Year of High School
(General Education Students in the 2005 Total Cohort as of June 2009)**

Asian/Pacific Island Students in the 2005 Total Cohort

	Number of Students	English Language Arts		Mathematics		Global History and Geography		US History and Government		Science	
		55 - 100	65 - 100	55 - 100	65 - 100	55 - 100	65 - 100	55 - 100	65 - 100	55 - 100	65 - 100
New York City Public Schools	10,615	89%	86%	93%	90%	88%	83%	87%	83%	89%	84%
Large City Districts	245	82%	80%	88%	85%	81%	74%	80%	74%	87%	79%
High Need Urban/Suburban Districts	395	83%	79%	86%	81%	83%	75%	83%	77%	86%	79%
High Need Rural Districts	86	87%	85%	93%	90%	87%	86%	88%	87%	88%	87%
Average Need Districts	1,537	93%	92%	96%	95%	91%	89%	93%	92%	95%	93%
Low Need Districts	2,463	97%	97%	99%	98%	95%	94%	97%	97%	98%	98%
All Public Schools	15,353	91%	88%	94%	92%	89%	85%	89%	86%	91%	87%

Black Students in the 2005 Total Cohort

	Number of Students	English Language Arts		Mathematics		Global History and Geography		US History and Government		Science	
		55 - 100	65 - 100	55 - 100	65 - 100	55 - 100	65 - 100	55 - 100	65 - 100	55 - 100	65 - 100
New York City Public Schools	22,191	79%	72%	81%	69%	73%	59%	72%	64%	75%	61%
Large City Districts	3,856	64%	58%	68%	55%	63%	46%	60%	51%	68%	55%
High Need Urban/Suburban Districts	4,464	78%	73%	81%	72%	76%	64%	75%	69%	80%	69%
High Need Rural Districts	384	76%	71%	77%	71%	74%	65%	77%	71%	80%	72%
Average Need Districts	3,447	85%	82%	88%	83%	84%	76%	83%	80%	88%	81%
Low Need Districts	1,264	93%	92%	94%	92%	90%	86%	92%	90%	94%	91%
All Public Schools	35,966	78%	72%	81%	70%	74%	61%	73%	66%	77%	64%

Hispanic Students in the 2005 Total Cohort

	Number of Students	English Language Arts		Mathematics		Global History and Geography		US History and Government		Science	
		55 - 100	65 - 100	55 - 100	65 - 100	55 - 100	65 - 100	55 - 100	65 - 100	55 - 100	65 - 100
New York City Public Schools	24,724	75%	69%	79%	68%	71%	57%	70%	61%	74%	60%
Large City Districts	1,626	66%	61%	70%	60%	63%	47%	62%	53%	68%	58%
High Need Urban/Suburban Districts	3,270	71%	68%	77%	70%	74%	64%	70%	65%	77%	68%
High Need Rural Districts	389	73%	67%	77%	69%	71%	61%	72%	68%	76%	70%
Average Need Districts	4,035	81%	78%	87%	82%	82%	74%	80%	76%	86%	81%
Low Need Districts	1,900	89%	86%	91%	87%	88%	83%	88%	85%	92%	88%
All Public Schools	36,162	76%	71%	80%	70%	73%	60%	71%	64%	76%	64%

White Students in the 2005 Total Cohort

	Number of Students	English Language Arts		Mathematics		Global History and Geography		US History and Government		Science	
		55 - 100	65 - 100	55 - 100	65 - 100	55 - 100	65 - 100	55 - 100	65 - 100	55 - 100	65 - 100
New York City Public Schools	8,617	89%	87%	89%	84%	85%	79%	84%	81%	87%	80%
Large City Districts	1,529	74%	71%	75%	70%	74%	67%	70%	66%	80%	74%
High Need Urban/Suburban Districts	6,090	84%	81%	87%	83%	85%	77%	82%	80%	88%	84%
High Need Rural Districts	11,219	88%	85%	91%	88%	89%	81%	87%	84%	92%	89%
Average Need Districts	52,715	92%	91%	94%	93%	93%	89%	92%	90%	95%	94%
Low Need Districts	23,834	98%	97%	98%	98%	97%	95%	97%	97%	99%	98%
All Public Schools	104,116	92%	91%	94%	92%	92%	88%	91%	89%	94%	92%

Table 4. Regents Examination Performance of Dropouts Who Entered Grade 9 in 2004-05

Region/Examination	Percent Not Tested	Percent of Dropout Students Scoring		
		0-54	55-64	65-100
<i>New York City</i>				
English	84.6%	7.4	2.6	5.4
Mathematics	75.1%	8.6	6.3	10.0
Global History	73.5%	15.9	4.1	6.5
U.S. History	92.1%	4.4	1.2	2.3
Science	76.6%	10.0	5.2	8.1
<i>Rest of State</i>				
English	78.6%	5.5	3.6	12.2
Mathematics	67.5%	5.8	5.3	21.4
Global History	60.4%	15.0	6.6	18.0
U.S. History	84.3%	4.0	2.0	9.8
Science	52.7%	12.1	7.6	27.6
<i>Total Public</i>				
English	81.4%	6.4	3.2	9.1
Mathematics	71.0%	7.1	5.8	16.2
Global History	66.4%	15.4	5.4	12.8
U.S. History	87.8%	4.2	1.6	6.4
Science	63.6%	11.1	6.5	18.8

Table 5. Regents Performance of Students with Disabilities in Selected Cohorts After 4 Years of High School

Examination	Percent Not Tested		Percent Scoring					
			0-54		55-64		65-100	
	2001	2005	2001	2005	2001	2005	2001	2005
English	45.6%	38.3%	17.2%	16.0%	8.9%	8.8%	28.3%	36.8%
Mathematics	45.7%	35.3%	19.8%	16.9%	8.0%	10.6%	26.5%	37.1%
Global History	41.2%	35.3%	19.0%	21.4%	9.0%	11.4%	30.9%	32.0%
U.S. History	49.5%	42.7%	12.6%	11.0%	7.9%	8.2%	29.9%	38.1%
Science	41.9%	36.8%	12.4%	14.5%	8.4%	10.6%	37.4%	38.1%

Table 6. Regents Performance of English Language Learners in Selected Cohorts After 4 Years of High School

Examination	Percent Not Tested		Percent Scoring					
			0-54		55-64		65-100	
	2001	2005	2001	2005	2001	2005	2001	2005
English	41.6%	31.7%	16.5%	16.9%	13.5%	9.3%	28.5%	42.1%
Mathematics	37.2%	24.2%	9.8%	10.1%	11.9%	13.0%	41.1%	52.6%
Global History	35.0%	30.3%	15.8%	16.2%	11.2%	13.9%	38.1%	39.5%
U.S. History	44.4%	35.9%	11.5%	10.4%	11.2%	10.4%	32.8%	43.2%
Science	35.4%	29.9%	14.1%	12.9%	12.7%	15.3%	37.7%	41.9%