



# Rethinking Pathways to High School Graduation in New York State

## *Forging New Ways for Students to Show Their Achievement of Standards*

**A Report Issued by the Coalition  
for Multiple Pathways to a Diploma**

Prepared by Advocates for Children  
of New York

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# Executive Summary

*TD was a 22-year-old living in New York City. While many students his age were contemplating college graduation and entering the workforce, TD was studying for his Regents exams. TD attended a comprehensive high school in New York City, finishing 12<sup>th</sup> grade on time with excellent attendance and passing grades in all of his classes. Interested in auto mechanics from his experiences in high school courses, TD planned on attending a technical college to study automotive sciences. However, preventing TD from graduating high school and pursuing additional education or workforce training were the five Regents exams required by the state of New York. During his high school career, TD attempted Regents exams a total of 37 times, having consistently struggled with three of the five required tests. He regularly attended New York City Department of Education Regents preparation classes, but upon turning 21, he was told he was too old to return to school. Lacking both school access and a high school diploma, TD continued to study independently for his three remaining exams.*



In New York State, more than 25% of high school students fail to graduate from high school within four years. Risk factors such as English language learner status, disability, and economic disadvantage drive this figure even higher. Regardless of circumstance, students must attempt and pass five exams to graduate from a New York public high school: English, Math, Science, Global Studies, and United States History. Each of these standardized exams is required for graduation, leading to their label of “high-stakes.” While public consensus supports high standards for graduation, the assessment structure adopted by New York is more onerous than most other states. Of the 25 states that currently require exams for graduation, only one requires more than New York State’s five exams.

The Coalition for Multiple Pathways to a Diploma<sup>1</sup> strongly supports high standards of student achievement, ensuring that students are prepared to thrive upon graduation and entry into higher education or the workforce. However, we believe that the State’s focus on high-stakes

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<sup>1</sup> The Coalition for Multiple Pathways to a Diploma (the Coalition) is a statewide coalition of educational and advocacy organizations and families who have come together to urge the creation in New York State of multiple pathways to a diploma, each of which holds all students to high expectations, provides them with quality instruction, and opens doors to career and post-secondary education opportunities. The members of the Coalition believe that measuring college and career readiness requires valuing several different and equally valid ways to evaluate students’ knowledge needed for success in the workplace and higher education. A list of Coalition members is provided in Appendix I. For more information about the Coalition, see: [http://advocatesforchildren.org/policy\\_and\\_initiatives/pathways\\_to\\_a\\_diploma](http://advocatesforchildren.org/policy_and_initiatives/pathways_to_a_diploma).

standardized exit exams creates unnecessary barriers to graduation for some students. As demonstrated nationwide, states requiring exit exams have lower 4-year graduation rates than those that do not.<sup>2</sup> For at-risk students, this gap is even higher. Research indicates that the negative effects of exit exams are actually underestimated, as students preemptively drop out of school before being exposed to all exams, perhaps acting as a tipping point against at-risk students. Each year, approximately 48,000 students in New York State are at risk of dropping out, representing a significant cost to individuals and the State.<sup>3</sup> This number is only likely to increase as the State rolls out more rigorous Common Core standards. It is therefore time for the State to develop a plan that ensures students are not prevented from graduating because they cannot adequately convey their knowledge or abilities on high-stakes standardized assessments.

In this report, we examine some of the obstacles that high-stakes standardized exit exams pose for students and address the need for more flexible exit exam requirements and assessment-based pathways to a diploma that do not rely on high-stakes standardized testing. We highlight some of the assessment-based pathways to graduation available in other states, many of which utilize fewer exams, as well as alternate routes to fulfilling exit exam requirements, such as performance-based assessments, waivers, and substitute exams. Performance-based assessments take on many forms, ranging from the New Jersey model of short-answer, open-ended exams to a portfolio model as used by the state of Washington. Waivers, too, are various. Some waivers, as in Indiana, simply require students to show adequate classroom performance, while others, such as in Ohio, mandate students to meet additional requirements such as exceptional attendance or attending remedial classes. Substitute exams also offer flexibility to students nationwide. Some states offer students the opportunity to take the SAT or Advanced Placement (AP) exams in lieu of exit exams, while others offer third-party or locally developed assessments. Multiple pathways to graduation such as those addressed in this report encourage a high standard of student learning leading to a regular high school diploma, while allowing achievement of that standard to be demonstrated in a variety of ways.<sup>4</sup>

Based on our review of the obstacles facing students in New York State as well as our research on the benefits of alternative pathways offered by other states, we outline several recommendations for the State to improve access to a high school diploma without sacrificing high standards that ensure college or career readiness. These recommendations are intended to be viewed together, rather than as alternative options for reform. Specifically, our recommendations are as follows:<sup>5</sup>

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<sup>2</sup> See Figure 3 in Section III of this report.

<sup>3</sup> See Figure 6 and Table 2 in Section IV of this report.

<sup>4</sup> As discussed in further detail in Section V of the report, the term “multiple pathways” has taken on a variety of meanings within the context of high school graduation. In this report, we address multiple pathways in terms of the different ways of allowing students to show that they meet standards without relying on traditional exit exams.

<sup>5</sup> Further details pertaining to each recommendation are offered in Section VI of the report.

## **Recommendation A**

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### **Reduce the Number of Exit Exams Required to Graduate with a High School Diploma from 5 to 3.**

The English Regents, one Math Regents, and one Science Regents would still be required for graduation. This recommendation is in line with states such as New Jersey, Maryland, Florida, and Indiana. Maintaining exam requirements in these subjects would give New York State the flexibility to use these assessments to comply with federal testing requirements.

All other Regents exams would remain optional and available for students who choose to take them in order to graduate with a Regents Diploma with Honors or Advanced Regents Diploma. The number, types, and sequence of credits required to graduate would not be affected. Students still would have to fulfill the same course requirements to receive a high school diploma.

## **Recommendation B**

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### **Develop a Pathway to Graduation That Allows All Students to Demonstrate Their Knowledge and Skills through State-Developed and/or Approved Performance-Based Assessments.**

In lieu of each Regents exam requirement, New York State should offer performance-based options, developed by the State in conjunction with schools and local school districts, which allow students to show their attainment of standards by completing a series of tasks/projects in contexts that are familiar and relevant to their high school experiences.

## **Recommendation C**

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### **Build More Flexibility and Support into the Current System to Make it More Accessible to Students.**

While more flexibility will not on its own be sufficient to address low graduation rates, the State's current set of graduation requirements should be made accessible to more students. Specifically, we ask that the State:

- ▶ Expand the Regents exam appeal process.
- ▶ Provide alternative options for assessing students in Career and Technical Education (CTE) programs.

- ▶ Provide an array of programmatic options and supports, using evidence-based interventions, for students who have difficulties moving through a given pathway.
- ▶ Ensure that the appropriate accommodations and supports are provided to students with disabilities and English language learners (ELLs).

## **Recommendation D**

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### **Ensure Transparency in Communications and Monitoring of all Aspects of the Multiple Pathways System.**

Communication is vital for ensuring student access to the various pathways recommended. Monitoring student outcomes with respect to each pathway is also crucial to guarantee that they are being implemented correctly and as intended. In order to ensure transparency:

- ▶ New York State must provide and communicate to students, families, and school professionals clear, concise, and easy-to-follow information on all of the alternative pathways that are available to students to receive a high school diploma.
- ▶ New York State must collect and disclose detailed outcomes data, including usage data on the specific diplomas and the pathways that students have taken to earn a high school diploma, as well as data that allow for comparison of outcomes across multiple student groups.

The recommendations herein do not seek to dilute standards or remove rigor from the high school experience. Introducing additional flexibility to the high school assessment structure simply recognizes that some students may better demonstrate their knowledge outside of a standardized exam setting. For these students, non-standardized assessment approaches may allow them to showcase skills previously unable to be measured in standardized form. New York State's heavy reliance on standardized exams does not affirm the wide variety of student needs and modes in which a student's true potential can be uncovered. We ask the State to allow all students to exhibit their knowledge in a manner that levels the playing field for students of all learning modes and enhances their opportunities for success.

It is important to note that the Coalition for Multiple Pathways to a Diploma also supports expanding instructional pathways to a diploma, such as CTE programs, provided that they are made accessible to diverse student populations, including ELLs and students with disabilities. In addition, the Coalition for Multiple Pathways to a Diploma believes the State must ensure continued access to the high school equivalency diploma for all students, a critical

pathway for older students who for whatever reason leave school without a diploma. However, for purposes of this paper, we have chosen to focus on the critical need for providing high school students with opportunities to demonstrate their attainment of college or career readiness standards without relying on high-stakes standardized exit exams.

# I. Introduction

Each year, more than one million students across the country drop out of high school. This trend is particularly concerning in New York State (NYS), where over 25% of high school students fail to graduate within four years, according to New York State Education Department (NYSED) data. For at-risk students such as students of color, ELLs,<sup>6</sup> students with disabilities, and students who are economically disadvantaged, this percentage is even worse.

Researchers and policymakers have posited various explanations for low graduation rates in NYS. One explanation among these that deserves further attention, however, is that the high number of exit exams makes graduation in the state particularly difficult. Exit exams are high-stakes, generally standardized, assessments that students must take in order to fulfill graduation requirements and receive a high school diploma. Not all states require exit exams, and in states that do require them, there are considerable differences in the number and type of exit exams students must take. In NYS, students must pass 5 required exit exams, more exams than are required in all but 1 state. While all states that require exit exams test students in English and math, NYS also requires that students be tested and pass exams in U.S. history, global history, and science. Each of these exams presents a hurdle to students to graduate high school.

Given these testing requirements, and the emergence of new, more rigorous standards focused on college and career readiness, the need to re-examine how NYS students obtain a high school diploma has never been more pressing. The consequences of failing to graduate high school are dire. Without a high school diploma, students are not allowed to sit for most civil service exams, pursue postsecondary education, or enlist in the military. In addition, many employers for entry-level jobs also require or prefer job applicants to have a high school diploma. Thus, students who do not finish high school are much more likely than graduates to be unemployed, living in poverty, incarcerated, unhealthy, divorced, and/or single parents.

In this report we highlight some of the obstacles faced by students in NYS as they attempt to overcome exit exam requirements and demonstrate that they meet state standards in order to graduate high school. In doing so, we address the need for more flexible exit exam requirements as well as the development of assessment-based pathways to a diploma that do not

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<sup>6</sup> Both NYS and the federal government in their data documentation refer to this population as Limited English Proficient (LEP) to indicate students who are eligible for English as a Second Language/Bilingual services according to state criteria. Since it is a designation often criticized for focusing on the deficiency in the student, we use the term ELLs in place of LEP.

rely on standardized testing. Section II details the problem of relatively rigid exit exam requirements and limited assessment-based pathways to a diploma in NYS. Section III discusses the impact of exit exams on graduation rates. Section IV outlines the consequences of the status quo in NYS, including both the individual and societal cost of current graduation rates. Section V provides an overview of the assessment-based pathways to a diploma offered in other states. Finally, drawing from the research on multiple pathways in other states and the experiences of advocates, educators, and families in NYS, Section VI offers recommendations for developing multiple pathways to a NYS high school diploma.

## II. Graduation Requirements and Pathways to a High School Diploma in New York State

### A. New York State Graduation Requirements

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States that require students to pass exit exams in order to graduate high school generally administer one of two types of exit exams—comprehensive and end-of-course (EOC) exams. Comprehensive exams assess multiple subjects on the same test and are taken by all students at a certain grade level. By contrast, EOC exams, like the Regents exams in NYS, are administered to students as they complete a specific course and assess mastery of the content for that course. Appendix II shows the states that currently require exit exams. *For the 2013-14 school year, 25 states, including NYS, required their students to pass an exit exam to receive a high school diploma.*

Although federal regulations under No Child Left Behind (NCLB) require states to assess high school students in reading, math, and science, states are not required to make passing these exams a condition of graduation. Nevertheless, many states, like NYS, use exit exams to meet the federal requirements. All 25 states with exit exam policies test students in English language arts, and most also test in math (McIntosh 2012). About half of the states with exit exam policies, including NYS, assess additional subjects, including science and/or social studies.

Among the states with the most arduous requirements in the nation, *NYS requires that students pass at least 5 different exit exams in order to graduate with a Regents diploma and as many as 9 different exit exams to graduate with an Advanced Regents diploma* (Thurlow, Vang, and Cormier 2010; McIntosh 2012; New York State Department of Education 2013). To receive a Regents diploma, students are required to pass (a) English, (b) math, (c) global history, (d) U.S. history, and (e) science Regents exams. For an Advanced Regents diploma, students must take and pass additional exams in math and science, as well as a foreign language exam. Table 1 details the graduation requirements for NYS.

**TABLE I:** Summary of NYS diploma requirements for students entering 9th grade in 2011

<b>Regents Diploma</b> Examinations: 5	
Students must pass Regents examinations as follows:	
<ul style="list-style-type: none"> <li>• Comprehensive English</li> <li>• Global History and Geography</li> <li>• United States History and Government</li> </ul>	<ul style="list-style-type: none"> <li>• One (1) in Mathematics (Integrated Algebra, Geometry, Algebra 2/Trigonometry, Mathematics A or Mathematics B); and</li> <li>• One (1) in Science.</li> </ul>
<b>Regents Diploma with Advanced Designation</b> Examinations: 7, 8, or 9	
Students must pass Regents examinations as follows:	
<ul style="list-style-type: none"> <li>• Comprehensive English</li> <li>• United States History and Government</li> <li>• Global History and Geography</li> <li>• Students graduating beginning with the 2011-12 school year and thereafter, regardless of cohort, who pass any of the following 2 or 3 mathematics examination combinations, will have met the mathematics assessment requirements for a Regents Diploma with Advanced Designation</li> </ul>	
<p><i>Two examination combination. A student must pass:</i></p> <ol style="list-style-type: none"> <li>1. Mathematics A and Mathematics B, or</li> <li>2. Mathematics A and Algebra 2/Trigonometry, or</li> <li>3. Mathematics B and Integrated Algebra;</li> </ol>	<p><i>Three examination combination. A student must pass:</i></p> <ol style="list-style-type: none"> <li>1. Mathematics A, Geometry and Algebra 2/Trigonometry, or</li> <li>2. Integrated Algebra, Geometry and Mathematics B, or</li> <li>3. Integrated Algebra, Geometry and Algebra 2/Trigonometry</li> </ol>
<ul style="list-style-type: none"> <li>• Two (2) in Science (at least one in life science and at least one in physical science); and</li> <li>• Language Other Than English (Regents Comprehensive Examination or if no Regents Examination is available a locally developed Checkpoint B examination) unless exempt through IEP or using a five-unit sequence substitution provision.</li> </ul>	
<b>Local Diploma</b> Examinations: 5	
The following local diploma options are available for students entering grade 9 in September 2011:	
<ul style="list-style-type: none"> <li>• Students with disabilities who score 55-64 on any of the required Regents examinations may earn a local diploma.</li> <li>• Students who successfully appeal two Regents Examinations scores within three points of the 65 passing score and who meet the other requirements of the appeals process specified in CR 100.5(d)(7) will earn a local diploma.</li> </ul>	

**Source:** New York State Department of Education (2011)

Furthermore, these Regents exams, despite the inclusion of long answer and essay questions, are predominately standardized assessments that impose time limits and rely heavily on multiple-choice items. Most Regents exams are three hours long and consist of (a) a multiple-choice section between 30 to 50 questions, and (b) a long-answer/essay section, which consists of either a selection of detailed questions for which the work must be shown, or a set of essay topics, of which one or two must be written about in detail. These types of standardized exams have generally been a significant obstacle for at-risk students in NYS, including students with disabilities and ELLs as discussed in Section III.

## B. Alternative Pathways to Graduation in New York State

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NYS offers students several, limited options to work towards graduation outside of the traditional classroom setting; these options do not change the exam requirements for obtaining a high school diploma. Alternative options include emerging CTE programs, work for credit programs, specialized high schools, magnet schools, and programs offered through the Boards of Cooperative Educational Services (BOCES).<sup>7</sup> For overage and under-credited students, New York City has transfer schools and young adult borough centers<sup>8</sup> focused on getting students back on track toward graduation.<sup>9</sup>

NYS also offers different diplomas for students who excel at Regents exams, as well as a diploma available mainly to students with disabilities.<sup>10</sup> These different diploma options require students to show a greater or lesser degree of mastery of state standards. The Advanced Regents Diploma, discussed in the previous section, requires students to pass at least two additional Regents exams. Students may also earn certain diploma designations, such as Honors or CTE, upon the successful completion of additional courses and exams, as well as meeting specific performance levels on Regents exams.

Meanwhile, the local diploma is available primarily to students with disabilities who score between 55 and 64 on any of the required Regents exams as well as students who successfully appeal two Regents exams scores by meeting the requirements of the appeals process specified in the next paragraph. There is also a compensatory option, which allows a student with a disability to earn a local diploma if the student scores between 45 and 54 on one or more of the five required Regents exams, other than the English or math exam, but scores 65 or higher on one or more of the other required Regents exams, in which case the lower score(s) can be compensated by the higher score(s). To access the compensatory option, the student must

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<sup>7</sup> For more information on these programs, see <http://www.boces.org/wps/portal/BOCESofNYS>.

<sup>8</sup> For more information on these programs, see <http://schools.nyc.gov/ChoicesEnrollment/AlternativesHS/default.htm>.

<sup>9</sup> According to advocates in New York City, there are concerns that many of these programs are not able to serve the needs of students with disabilities and ELLs.

<sup>10</sup> NYS state offers no diploma or assessment based pathways specific for ELLs. However, according to NYSED, ELLs may take Regents exams in math, science, and social studies either in an alternative-language edition or in English, whichever is more appropriate to the student's reading skills. During the January and June exam periods, the Regents exams in Integrated Algebra, Global History and Geography, United States History and Government, Living Environment, and Physical Setting/Earth Science are available in five languages other than English: Chinese (Traditional), Haitian Creole, Korean, Russian, and Spanish. During the August exam period, these Regents Exams are available in Spanish translation. During all three exam periods, only English language editions are provided for the Regents exams in Algebra 2/Trigonometry, Comprehensive English, Geometry, Physical Setting/Chemistry, and Physical Setting/Physics.

also obtain a passing grade for the course corresponding to the Regents exam in which he or she received a score of 45 to 54 and have a satisfactory attendance rate.

Very few pathways to graduation available in NYS alter the burdensome exit exam requirements that students face in their quest to graduate with a high school diploma. Students who attend schools operated by the Performance Standards Consortium (the Consortium) are exempt from all but the English Regents exam.<sup>11</sup> Instead, students at Consortium schools must satisfactorily complete portfolios demonstrating their achievement of high school standards. For all other students, NYS offers two assessment-based alternative pathways that lead to a high school diploma (Thurlow, Vang, and Cormier 2010; McIntosh 2012; New York State Department of Education 2013). One consists of an appeal process and the other entails the substitution of exams. Students who access the appeal process can appeal up to two Regents exams upon meeting the following criteria with respect to the exam under appeal: (1) fail the Regents exam twice, (2) score at least a 62, (3) utilize the academic help provided by the school in the subject tested by the Regents exam, (4) have an attendance rate of 95% (except for excused absences) for the school year during which the student last took the Regents exam, (5) pass the course in the subject of the Regents exam, and (6) be recommended for an exemption by the student's teacher/department chairperson in the subject of the Regents exam. Students who successfully appeal one Regents exam and pass all other Regents exams may earn a Regents diploma. Students who successfully appeal two Regents exams and pass all other Regents exams may receive a local diploma.

While the NYS Regents appeal process provides a safety net for students who were close to passing the exam and have performed well in the corresponding class, it does little to assist students who are most at-risk of not graduating as a result of their performance on standardized tests. First, it is likely that if a student has achievement levels around the cut-off score in one test subject, that student will also have similar achievement levels in other subjects. That means, for some students, providing an appeal for just one or two Regents exams, when there are five required to graduate, may not be enough. Second, there is no publicly available empirical evidence in support of using 62 as the optimal threshold for a cutoff score under the appeal. The arbitrariness of the appeal cutoff point ignores the fact that exams and the cohort of test-takers can vary significantly from year to year. In some years, a 62 may be a reasonable cutoff point, but in a year where there is greater volatility among student scores, performance on that exam may not be reflective of a student's true knowledge and abilities. In that case, a cutoff lower than 62 may be warranted.

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<sup>11</sup> For more information on Consortium schools, see <http://performanceassessment.org>.

As an alternative to the appeal process, students who have completed the course in a subject tested by a Regents exam may opt to substitute a minimum acceptable score on a department-approved alternative exam (such as the SAT II, AP, or International Baccalaureate (IB) exams) for a Regents exam score. Again, while this pathway presents another option for students, it fails to address the assessment needs of those most at-risk. First, at-risk students often tend to have less access to AP and IB courses due to the lack of availability in the schools they attend as well as recently reduced federal funding for fee waivers. This reduced access severely limits the number of at-risk students able to use this diploma pathway. Second, even if such students were to have access to these assessments, it is likely that in many cases, their performance would be no better than on Regents exams given that these alternatives follow a standardized format as well. Students who traditionally struggle on standardized tests are no closer to graduation under this pathway.

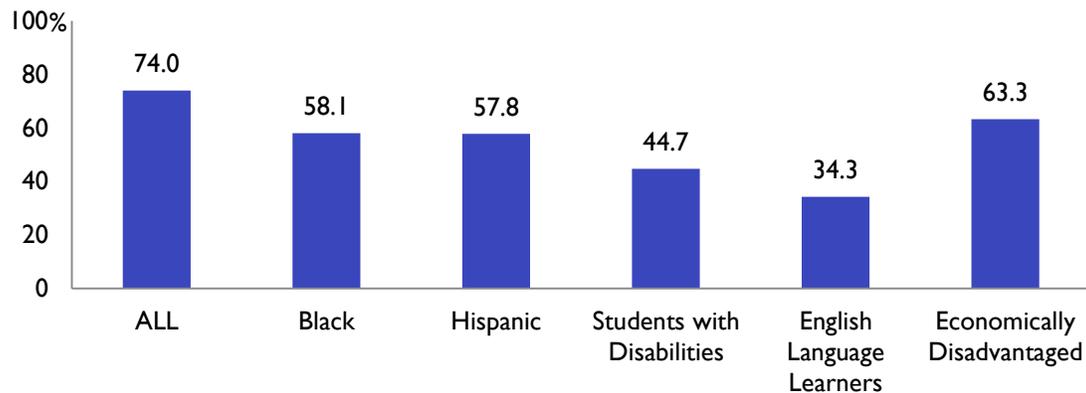
During the 2010-2011 year, only 272 students used either of these two alternative paths, representing just .1% of the graduating cohort (McIntosh 2012). Aside from re-taking the exam or a similar assessment, and an appeal process that still requires students to perform well on standardized tests, NYS offers no opportunity for students to show their mastery of standards via alternative means. While these opportunities may be enough for the small number of students who take advantage of them every year, for those with learning differences, anxiety issues, language barriers, or disadvantaged backgrounds, these options may be insufficient, and may contribute to those students not graduating.

# III. The Impact of High School Exit Exams on Graduation Rates

## A. Graduation Rates

As the focus of high school education moves toward college and career readiness and higher standards, high school graduation rates in NYS have been receiving considerable attention from educators, policy makers, and advocates alike. Based on data for the 2008 cohort, the current 4-year graduation rate in NYS is 74%.<sup>12</sup> *Importantly, this means that approximately 1 in 4 students failed to graduate on time or at all in NYS.*<sup>13</sup> Graduation rates also vary significantly across demographic groups. In particular, students of color, ELLs, students with disabilities, and students who are economically disadvantaged are negatively impacted by low graduation rates. Figure 1 compares 4-year graduation rates across these groups for the 2008 cohorts. Results show that traditionally disadvantaged student groups such as Black (58.1%) and Hispanic (57.8%) students, ELLs (34.3%), students with disabilities (44.7%), and economically disadvantaged students (63.3%) continue to graduate at significantly lower rates than the other student in NYS.

**FIGURE I:** 4-year Graduation rates by sub-group, 2008 cohort



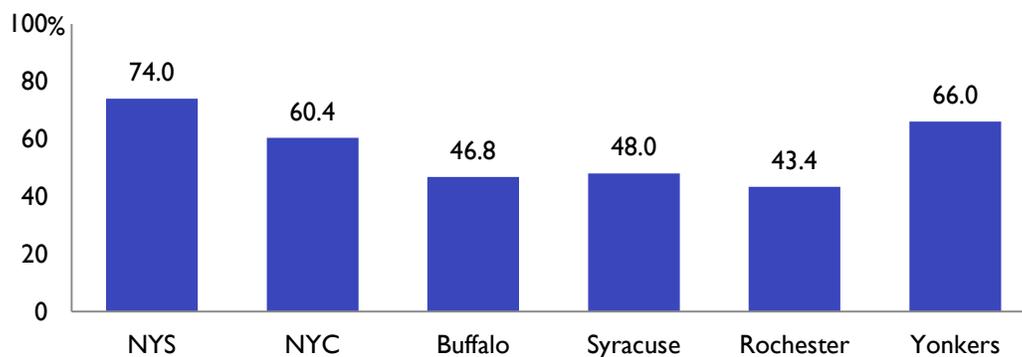
**Source:** New York State Education Department (2013)

<sup>12</sup> A cohort is a group of students who entered 9<sup>th</sup> grade at the same time. In this context, the cohort represents students who entered 9<sup>th</sup> grade in the fall of 2008 and were expected to complete high school in the spring of 2012.

<sup>13</sup> We recognize that some students may require more than four years to graduate high school. For example, some ELLs may require more than four years to graduate due to periods of interrupted formal education, or as a result of requiring the extra time to learn sufficient English to pass Regents exams. Nonetheless, we focus on four-year graduation as a desired outcome given it is part of the normative trajectory of educational attainment in the U.S. In addition, many high school outcomes are tracked in terms of 4-year rates.

These disparities across student groups are further confirmed by comparing the NYS’s overall 4-year graduation rate with the 4-year graduate rates of the five largest districts in NYS. Figure 2 indicates that in each of the five largest school districts, which also happen to be urban areas with a high concentration of disadvantaged youth, 4-year graduation rates remain considerably less than NYS overall. For example, the 4-year graduation rate in Rochester is 43.4% for the 2008 cohort, approximately thirty percentage points fewer than the NYS rate. Collectively, these data show that not only are a significant number of students not graduating on time in NYS, but the problem is particularly salient among at-risk groups.

**FIGURE 2:** 4-year graduation rates by Big Five school districts, 2008 cohort



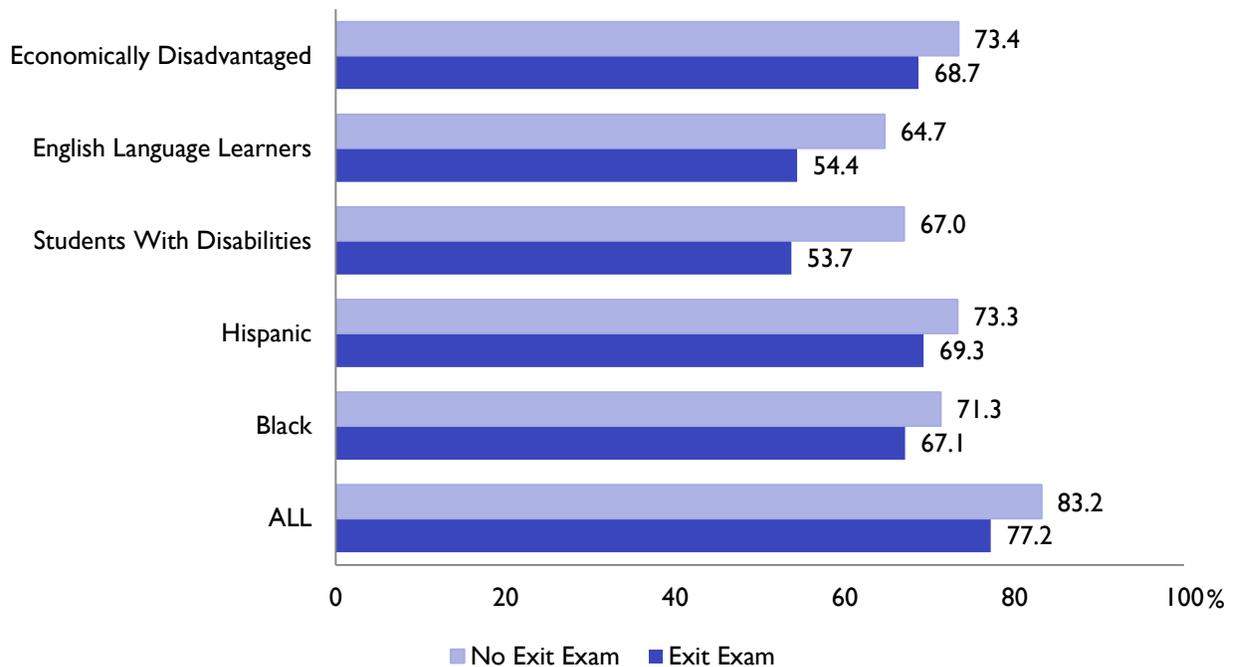
**Source:** New York State Education Department (2013)

## B. The Relationship between Exit Exams and Graduation Rates

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Because students must pass exit exams in addition to meeting general course requirements, exit exams can pose a significant obstacle to graduation. Figure 3 compares graduation rates for student demographic sub-groups based on whether states required an exit exam for the 2007 cohort. Results show that overall, *states that offered exit exams had lower 4-year graduation rates than states that did not*. Furthermore, while graduation rates for the same at-risk groups defined above remained low in states with no exit exams, they were higher than in states with exit exams. In particular, ELLs fared significantly better in states with no exit exams than in states that mandate them.

**FIGURE 3:** 4-year State Graduation Rates by Required Exit Exam Status, 2008 cohort<sup>14</sup>



**Sources:** U.S Department of Education (2012); Thurlow, Vang, & Cormier (2010); Unpublished Advocates for Children Analysis (2013)

Research has generally supported these observed patterns. For example, Warren, Kulick and Jenkins (2006) found that exit exams are associated with lower high school completion rates. They also found the effects on graduation rates were more severe with more difficult exams. Graduation rates were on average 2.1% points lower in states with more difficult exams. They also found that the negative effects become more pronounced in states where there are more students who are of color or in poverty. Dee and Jacob (2009) found that students in states with fairly easy exams were 4% more likely to drop out than students in states without exit exams, while students were 5.5% more likely to drop out in states with more difficult exit exams. The fact that these rates are modest can be explained by three factors. First, only a fraction of students drop out relative to students who graduate. This will naturally mask any effects that exit exams would have on subsets of the population. Second, the fact that many students drop out

<sup>14</sup> No data were available for Idaho and Oklahoma. Data on Hispanic graduation rates were suppressed in Vermont. The 4-year adjusted cohort graduation rate is the number of students who graduate in four years with a regular high school diploma divided by the number of students who form the adjusted cohort for the graduating class. From the beginning of the earliest high school grade, students who are entering that grade for the first time form a cohort that is "adjusted" by adding any students who transfer into the cohort and subtracting any students who transfer out, emigrate to another country, or die.

early in their high school careers may result in underestimation of the effects of exit exams. That is, many high school dropouts will leave school prior to being exposed to all exit exams in their state. Thus, the number of students for which the impact of exit exams could be observed and measured is lower than it would be had they remained in school. Finally, not all exit exam requirements are created equal. Since exam requirements can vary with respect to difficulty, validity in measuring students' learning in the subjects tested, and the number of exams required for graduation, it may be difficult to distinguish the true effects of high school exit exams on dropout rates.

Other studies have noted that while exit exams alone may not cause many students to drop out, they might still act as a tipping point for some students, especially those from disadvantaged backgrounds who already deal with their own unique set of challenges. For instance, a student might already be at risk for dropping out after a long history of poor academic achievement, at which point, dealing with the requirement of having to take or retake an exit exam, the student gets discouraged and decides not to continue with their pursuit of a high school diploma. Ou (2009) found that minority and low-income students who just failed New Jersey's exit exam were more likely to drop out of high school than comparable students from other groups, especially if the students failed on the first attempt. Ou suggested this may be because students who try hard but fail nonetheless become discouraged, and because the perceived cost of preparing for retests is high if remedial opportunities are lacking or if schools fail to provide clear information on retake opportunities and alternative ways to graduate. Papay, Murnane, and Willett (2010) in Massachusetts, also found that low-income students from urban areas were more susceptible to the effects of failing the exam than their more affluent, suburban peers. Low-income urban students were more likely to drop out of high school after barely failing the test on their first try than students who barely passed. The researchers suggested that these findings are due to students becoming discouraged and limited remedial resources in urban schools.

## **C. Concerns about Standardized Tests as Exit Criteria**

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Most exit exams tend to take the form of standardized tests. A standardized test is designed in such a way that the questions, testing conditions, scoring procedures, and interpretations are consistent, and they are administered and scored in a predetermined manner. Standardized tests are typically time-limited and multiple choice. They are a popular way to measure achievement of standards because they are relatively easy to implement and results are thought to be more comparable across test takers.

However, standardized testing has been a highly contested practice for many reasons. First, standardized testing assesses a student's performance at one particular point in time and

does not make allowance for external factors (Popham 2001; Haladyna 2006). For example, there are many students who just do not do well on tests. Many of these students are intelligent and comprehend the material, but their comprehension is not captured by standardized exams. Other students also acquire test anxiety, which thwarts performance (Phillips 2006). In addition, if a student is facing challenges at home during the testing period, it is likely his or her attention will not be on the test. Second, standardized testing can lead some teachers to “teach to the test” (Moon, Brighton, Jarvis, and Hall 2007). This teaching style can hamper a student’s learning by fostering an atmosphere that inhibits imagination and fails to develop critical thinking skills, causing students to disengage with the learning material and school altogether. Third, standardized tests are often biased against certain demographic groups. This has been particularly true for ELL students and students with disabilities (Koretz 2008). Advocates for students with learning disabilities, in particular, have long contended that the very nature of their disabilities creates a tremendous obstacle to demonstrating their knowledge on standardized tests. (Disability Rights Advocates 2001). Fourth, standardized tests measure only a portion of what makes education meaningful and relevant to students. According to Bracey (2001), standardized tests fail to measure qualities such as creativity, critical thinking, resilience, motivation, persistence, curiosity, reliability, self-discipline, leadership, and integrity. They may have little validity. In other words, the tests do not measure performance in school or even more importantly, in the labor market. Finally, and, perhaps, most importantly, *there is no evidence that standardized testing improves graduation rates or student achievement* (National Research Council 2011) *or that postsecondary institutions are using exit exam scores to make decisions about admissions, placement, or financial aid* (McIntosh 2012).

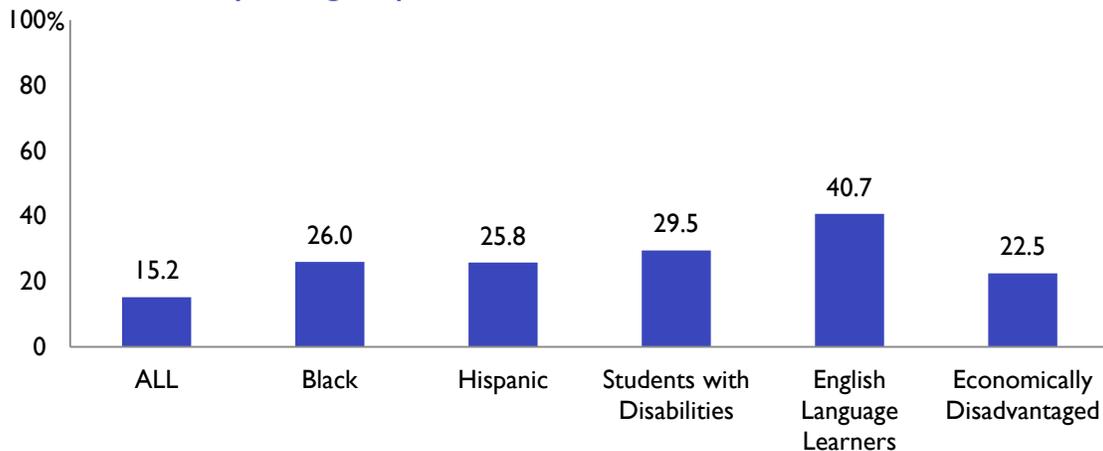
## IV. The Consequences of Not Graduating

Low graduation rates have severe consequences for individuals, families, and society at large. For the approximately 25% of students who are not able to graduate within four years, there are two options in NYS. One option is to stay in school longer; the other is to drop out of school altogether. Each of these choices comes with its own set of repercussions that place those without a high school diploma at a significant disadvantage in society, with NYS taxpayers sharing the burden.

### A. Remaining Enrolled After Year 4

For the 2008 cohort, 15.2% of all students remained enrolled beyond a fourth year of school. Importantly, data show that at-risk students are more likely than other students to remain in school beyond a fourth year. Figure 4 compares the percentage of students that remain enrolled in school past their fourth year across several demographic groups for the 2008 cohort. This figure shows that *not only are these student sub-groups more likely to stay in school beyond their fourth year, but ELLs are especially impacted*. For the 2008 cohort, approximately 40.7% of students who are ELLs (or 2 out of every 5), stayed in school beyond their fourth year.

**FIGURE 4:** 4-year rates of students “Still enrolled after their fourth year” by sub-group, 2008 cohort



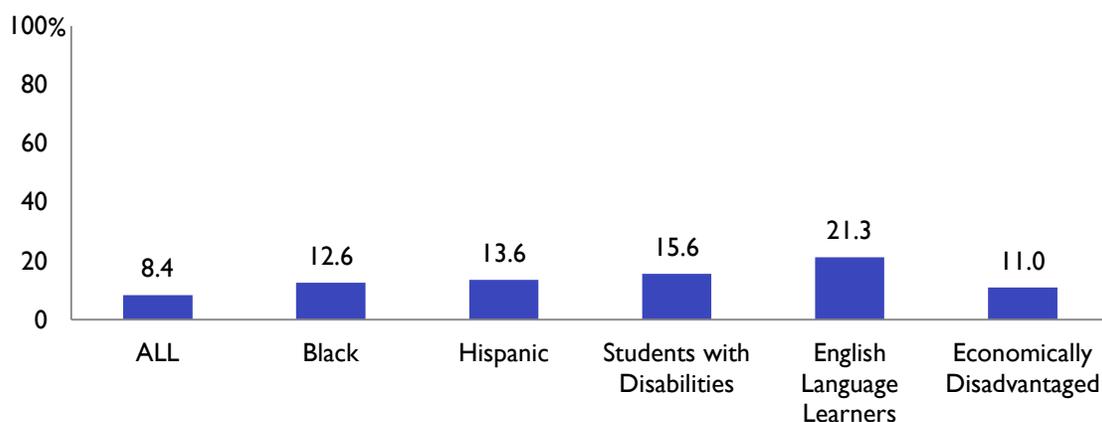
**Source:** New York State Education Department (2013)

There will always be students who require some extra time to fulfill NYS graduation requirements. However, having students remain beyond their fourth year simply because they have not completed exit exam requirements has serious economic implications. NYS spends \$19,076 per-pupil (U.S. Census Bureau 2013) and with 15.2% of all students staying into a fifth year, that's approximately \$642 million in additional yearly NYS expenditures per cohort. Improving 4-year graduation rates would provide significant savings to the NYS education budget. It is important, though, that the additional cost for educating students beyond their fourth year be weighed against the considerable cost of having them drop out, as discussed below.

## B. Dropping Out

Beyond staying in school for a fifth or sixth year, students who fail to meet the graduation requirements also have the option to leave school. Students who remain beyond their fourth year are more likely to drop out of high school. National research done through meta-analysis suggests that the experience of being simply a year behind makes students 50% more likely to drop out (Jimerson 2001). *Students who are two or more years behind have a four-year dropout rate of 33%*. High dropout rates can have severe personal and societal consequences. Figure 5 depicts 4-year dropout rates for NYS overall and by demographic sub-group for the 2008 cohort. *The dropout rate for NYS remains unacceptably high (8.4%), and its effects grossly unequal*. In particular, students with disabilities and ELLs are adversely affected by the dropout crisis. *Approximately 15.6% of students with disabilities and 21.3% of ELLs will drop out of high school by their fourth year*. Overall, these inequities in dropout rates are further exacerbated by the number of students estimated to drop out beyond their fourth year of high school.

**FIGURE 5:** 4-year dropout rates by sub-group, 2008 cohort



**Source:** New York State Education Department (2013)

It has been well documented that students who fail to graduate from high school face a very bleak future. Individuals without a high school diploma and limited work experience are also among those who have the most difficult time finding work (Current Population Survey 2011). Since a high school diploma is essential for success in today’s economy, students who do not receive a diploma are likely to experience significantly reduced earnings. *In NYS, individuals age 25 and over who have not earned a high school diploma earn approximately \$400 less per week for full-time work (\$480) than the median earnings per week for a full-time worker (\$865) (Current Population Survey 2011). In addition, individuals without a high school diploma in NYS face unemployment rates that are 50% higher (12.2%) than the overall state unemployment rate (7.1%). Because of these less favorable employment outcomes, the estimated lifetime earnings of dropouts are at least \$143,900 less than those of high school graduates (Alliance for Excellent Education 2011). In sum, high school graduation is a very important predictor of young people’s individual life prospects.*

The costs of failing to graduate from high school are not limited to dropouts themselves, but also brim over to society. These social costs include greater spending on public assistance and health care, in addition to crime.<sup>15</sup> Because dropouts do not perform as well in the labor market as high school graduates in terms of earnings and employment, they also do not contribute as much in terms of tax revenues. In NYS, the societal costs of a cohort of high school dropouts are considerable.<sup>16</sup> Table 2 presents the number of students who failed to achieve a diploma within six years. Based on six-year graduation data, *as many as 48,000 students per cohort (or approximately 22% of each cohort) failed to achieve a diploma during that time, including more than 24,000 economically disadvantaged students, nearly 15,000 Black or Hispanic students, and close to 6,000 students who are ELLs.* Some of these students will finish high school, but leave without receiving a

**TABLE 2: Students at-risk of dropping out, 2006 cohort**

	# of Students At Risk of Not Graduating	% of Student Sub-Group at Risk of Not Graduating
ALL Students	48,044	21.5%
Black	15,986	36.1%
Hispanic	15,507	36.0%
Students with Disabilities	14,902	46.5%
English Language Learners	6,038	53.7%
Economically Disadvantaged	24,370	28.5%

**Sources:** New York State Education Department, Graduation Rates (2013); Unpublished AFC Analysis (2013)

**Note:** Estimates based on number of students in 2006 cohort who did not graduate with a Regents diploma within 6 years.

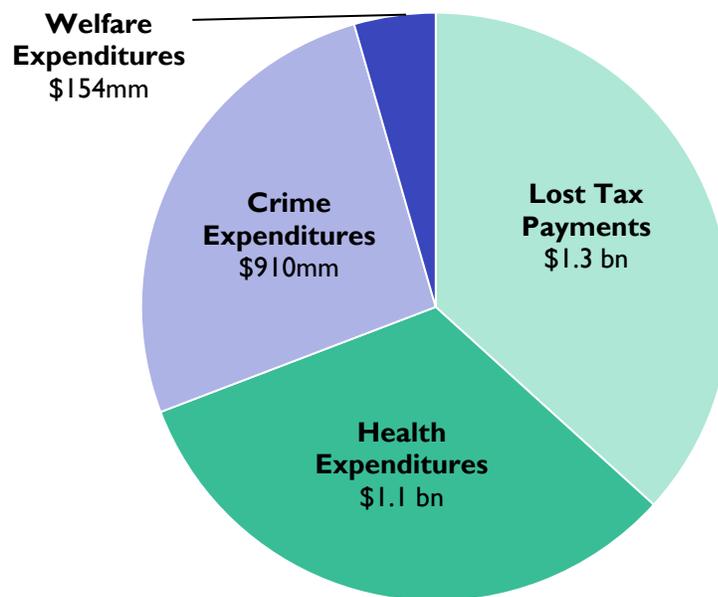
<sup>15</sup> Research by Baker and Lang (2013) links exit exams to dropout and higher incarceration rates.

<sup>16</sup> To determine these costs to NYS, we first estimated the total number of students at-risk of dropping out. We did so by calculating the number of students in the 2006 cohort who had not obtained a Regents diploma within six years.

diploma. Others will not complete high school because they do not see a viable path to graduation even if they stay for five or six years.

These 48,000 potential dropouts will have a significant cost to NYS. Figure 6 shows the projected lifetime amount that each cohort of dropouts will cost NYS and its localities by expense category. In total, *each cohort of dropouts will cost NYS as much as \$3.5 billion due to lost tax payments as well as an increase in health, crime, and welfare expenditures.*

**FIGURE 6:** Projected lifetime cost of dropouts per cohort to New York State and local governments, 2013



**Sources:** Belfield (2007); Muennig (2005); Unpublished Advocates for Children Analysis (2013)  
**Note:** Lifetime values based on a 3.5% discount rate and are in 2013 dollars.

## V. Multiple Pathways to Graduation in Other States

Many states with exit exams have modified exit exam requirements and developed alternative assessment-based pathways to graduation in an effort to allow more students access to a high school diploma. This section provides an overview of how some states are restructuring exit exam requirements, as well as details of the types of assessment-based pathways to graduation that other states offer and some of the experiences of those states.

### A. The Changing Landscape of Exit Exam Requirements

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As low graduation rates continue to be a problem in some states, several states have been lightening the burden of exit exams on students by adopting legislation that modifies the number of exit exams students are required to pass to receive a high school diploma. For example, Texas recently reduced the number of exit exams from a staggering 15 to 5. Minnesota eliminated its high school exit exam requirements in reading and math in favor of the state-developed Career and College Assessment and College Entrance Assessment, which measure whether students are college and career ready based on their performance in math, reading, and writing. Students do not have to meet a predetermined benchmark on either assessment in order to graduate. In South Carolina, a bill is pending that would require students to continue to take the English language arts and math exit exams as a graduation requirement, but would not require students to attain any minimum score to receive a diploma. Meanwhile, other states such as Florida have developed a tiered set of exit exam requirements based on three different types of diplomas. The standard diploma requires students to pass the 10<sup>th</sup> grade English/Language Arts assessment and Algebra I end-of-course assessment. The Geometry, Algebra II, biology and U.S. History end-of-course assessments also count as 30% of the respective course grades. To earn a merit designation, a student must, in addition to meeting the requirements for a standard diploma, attain one or more industry certifications. Finally, to earn a “scholar” designation, a student must, in addition to meeting the requirements of a standard diploma, pass the Algebra II and biology end of course assessments.

Given that these changes have occurred only within the past year, it is too soon to know what type of impact they will have on graduation rates and college and career readiness. However, in light of the fact that states with no exit exams have higher graduation rates, we can expect to see a similar pattern emerge in states that are reducing the number of exams over the

coming years. More importantly, it is clear that an increasing number of states are beginning to reconsider the utility of exit exams in making high-stakes decisions. Rather than focusing on assessments, these states have acknowledged that not every student will take the same career and educational path and that students can meet high standards with a reduced or more targeted number of high-stakes exams.

## **B. Multiple Pathway Options in Other States<sup>17</sup>**

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While modifying graduation requirements appears to be an emerging trend among some states with exit exams, others have looked to creating a system of multiple pathways to help students finish high school. “Multiple pathways” has taken on a variety of meanings within the context of high school graduation. Here, we address multiple pathways in terms of the different ways of allowing students to show that they meet state standards without relying on traditional exit exams. In other discussions surrounding high school reform, the term has been used to encapsulate a set of curriculum options or modes of instruction that lead to alternative career and educational pathways. Meanwhile, others have focused on the relaxing of standards or benchmarks for different groups of students.

Two specific forces have shaped the expansion of policies surrounding multiple pathways across the country (Dietz 2010). First is the need to address the challenges of students who have traditionally not demonstrated their best performance on standardized tests, mainly students with disabilities and ELLs. Unlike remediation options, which seek to prepare students to pass exit exams, alternative pathways to graduation allow students to display their attainment of learning standards through different measures. These pathways represent a more expansive way of thinking about test validity and equality for these students. A second impetus behind alternative pathways nationally is the need to deal with concerns about assessing student learning based on standardized assessments, especially for students who score near designated cut scores. Providing opportunities to re-take exams has mitigated this concern, but it may not be the most efficient way for students to spend their learning time as they study for the same exit exams over and over again. Having students retake exams multiple times also imposes greater financial costs to the State.<sup>18</sup>

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<sup>17</sup> Many states offer alternative pathways that are only for students with disabilities and ELLs. We do not focus on those pathways in this report because they typically involve lowering standards, including reducing cut-off scores and modifying learning standards.

<sup>18</sup> Having students retake exit exams multiple times also imposes additional financial costs on districts, which must proctor and grade exams multiple times.

States have adopted various approaches to deal with these issues. Appendix III lists the types of pathways that are available for students who fail exit exams in states that require them. Out of the 25 states that require exit exams, 15 states offer at least one alternative path to ALL students that leads to a high school diploma. These pathways generally fall into one of three categories: (1) the use of coursework or end-of-course performance-based tasks to demonstrate knowledge in lieu of passing an exit exam, (2) waivers or appeals of exit exam requirements, typically after students have made one or more attempts to pass an exit exam and have met other requirements related to attendance, remediation, grade point average, teacher recommendations, or some benchmark of test scores, and (3) substitute scores from another assessments, such as the ACT, SAT, or AP tests. The next sections highlight some noteworthy examples of alternative pathways across the nation in each of these three categories that open opportunities for all students.

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### **i. PERFORMANCE-BASED ASSESSMENTS**

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Students in 6 states have the option to graduate through performance-based assessments, where students demonstrate mastery through a collection of work or a set of performance-based tasks (Appendix III). For example, in Maryland, the Bridge Plan for Academic Validation assigns project modules to students who twice fail any of the required Maryland High School Assessments (HSAs) (Thurlow, Vang, and Cormier 2010; McIntosh 2012; Maryland State Department of Education 2013). The required Maryland HSAs are high school end-of-course examinations measuring attainment of the Maryland Content Standards for English, algebra/data analysis, biology, and government.<sup>19</sup> Project modules for the Bridge Plan address areas where students have not fully demonstrated mastery in their exam performance. A local review panel, established by the local school district, reviews a student's completed modules and provides a recommendation to the local superintendent. The local superintendent conducts a final review for approval or refusal of the student's work. To access the Bridge Plan, a student must (a) pass the HSA-related course; (b) not pass an HSA test after two attempts; (c) participate in locally-administered or approved assistance; (d) make satisfactory progress toward graduation; and (e) demonstrate satisfactory attendance as determined by the local school system.

The Collection of Evidence (COE) option in Washington State allows students who have twice failed their comprehensive exit exam in English language arts or end-of-course exams in math to show their skills through a compilation of classroom work samples (Thurlow, Vang, and Cormier 2010; McIntosh 2012; State of Washington Office of Superintendent of Public Instruction 2013). These subject-specific work samples are developed under a teacher's

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<sup>19</sup> A module for the government HSA is still in development.

supervision and must follow state guidelines for collection.<sup>20</sup> Assessments are scored at the state level by professional scorers trained by state content specialists. A student may only submit one COE per content area throughout his/her high school career. Although students must fail their exit exams twice, the COE is generally administered in the 12<sup>th</sup> grade. Washington also offers an augmented COE for students who score within a certain range just below the cut-off score.

New Jersey developed its own performance-based assessments, the Alternative High School Assessment (AHSA), which consist of open-ended, short-answer questions that measure cognitive skills as well as knowledge of language arts literacy and math<sup>21</sup> (Thurlow, Vang, and Cormier 2010; McIntosh 2012; State of New Jersey Department of Education 2013). These assessments are developed by the state and administered by schools to students who do not pass one or more of the sections of the comprehensive High School Proficiency Assessment (HSPA). Though the state determines common cut scores, scoring rubrics, and guidelines, district-appointed panels conduct the review and scoring. The school initiates a student's participation in the AHSA. Specifically, the school provides mandatory targeted instruction, designed by content teachers, for the content area that the student failed. The student then takes the fall administration of the HSPA content area for which the student received targeted instruction. If, at this point, the student still has not passed the test, then the student begins the AHSA process. This involves passing two Performance Assessment Tasks (PATs) for each cluster in the content area. The tasks correspond to the HSPA and are distributed to the district test coordinators by the New Jersey Department of Education. The PATs are scored by two or three local readers via a state-provided rubric.

Despite the potential for performance-based assessments to meet the needs of students who struggle on standardized tests, usage of the above-described pathways remains low. Based on discussions with advocates in states where performance-based pathways are available, the lack of clear communication from state education departments is a major impediment to students accessing these options.<sup>22</sup> In addition, in some of these states, the pathways are not accessible until a student's senior year in high school, by which point many of the students who would benefit from these pathways are no longer engaged in school or have already dropped out.

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<sup>20</sup> State guidelines for the Washington COE, as well as sample items, can be found at <http://www.coe.k12.wa.us/domain/22>.

<sup>21</sup> There is discussion of eliminating the AHSA in favor of targeted instruction to help students pass assessments developed by the Partnership for Assessment of Readiness for College and Careers (PARCC) starting with the incoming class of 2016. However, details of this proposal are yet to be made public.

<sup>22</sup> For the purposes of this report, we interviewed advocates in five different states (Florida, Indiana, Massachusetts, New Jersey, and Maryland) during summer 2013 regarding their experiences with graduation requirements, exit exams, and alternative pathways in their states.

More generally, performance-based assessments as exit exams have been criticized by some for their lack of reliability (Stecher 2010). In other words, according to critics, performance-based assessments are not always a consistent measure of academic performance due to the subjective nature of scoring the tests. However, it is important to note that performance-based assessments represent a broad range of assessments with varying degrees of reliability. While performance-based assessments are often associated with portfolios, which consist of samples of work collected over time, they can also include test questions where the responses are constructed rather than selected among a set of choices, as with standardized test questions. Furthermore, steps can be taken to improve reliability (Browder 2001). For example, performance measures could be clearly defined and corroborated by experts in the content field as well as by key stakeholders. Clear guidelines (i.e. rubrics) for scoring could also be developed, where scorers who know the standards being assessed are trained to attain considerable levels of agreement in using the appropriate scoring method.

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## **ii. WAIVERS/APPEALS**

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Another type of pathway exempts students from passing certain exit exams, usually upon having met a set of requirements to show attainment of standards either related to performance on the test itself or other external measures. Nine states offer waivers where students may graduate without passing exit exams if they meet certain requirements (Appendix III). For the waiver option, the eligibility criteria become particularly important to maintain the rigor of the state testing system, so states often attach specific conditions for using the waiver. In Indiana, to receive the Work Readiness waiver, the student must take the exam for which the student is seeking a waiver (Algebra I and English 10) each year at least once, complete remediation opportunities, maintain school attendance and a “C” average, and satisfy local and state graduation requirements (Thurlow, Vang, and Cormier 2010; McIntosh 2012; Indiana Department of Education 2013). In addition, the student must complete course and credit requirements for a general diploma, including the career academic sequence, a workforce readiness assessment, and at least one career exploration internship, cooperative education, or workforce credential recommended by the student’s school. The student or parent/legal guardian must request the waiver, which is granted by the Indiana State Board of Education.

In Maryland, a waiver is available for students who take the High School Assessment (HSA) exams (English, algebra/data analysis, biology, and government), but do not pass one or more of them (Thurlow, Vang, and Cormier 2010; McIntosh 2012; Maryland State Department of Education 2013). The student does not have to retake any exam if the sum of all of the earned scores is 1602 points, which represents the sum of the minimum passing scores on each of the HSA exams (algebra/data Analysis: 412; biology: 400; English: 396; government: 394). Any

student who takes the four HSA exams and earns at least this total combined score is deemed to have met the assessment requirement. The nature of this alternative suggests that underperformance on one or more exams can be substituted by superior performance on the remaining exams.

Other states have taken a more nuanced approach in developing their waivers. In Massachusetts, in order to receive a waiver, the grades of the student who did not pass the Massachusetts Comprehensive Assessment System (MCAS) exam (but attained a score of at least 216) are compared to those of at least 6 other students, who scored between 220 and 228 (the minimum passing standard on the MCAS) and who were enrolled in the same sequence of courses in the content area for which an appeal was filed (Thurlow, Vang, and Cormier 2010; McIntosh 2012; Massachusetts Department of Elementary and Secondary Education 2013). The appeal is granted based on whether the student filing the appeal can show comparable classroom performance in the same courses to at least 6 students in his or her cohort with higher MCAS scores. To be eligible for the waiver, the student must fail the MCAS before filing an appeal (3 times for English language arts or math; 1 time for science/technology/engineering). The student also must have a 95% attendance rate during the school year of the appeal and must have participated in school sponsored academic support services in the content area for which the appeal is filed.

Washington State uses a “GPA comparison” option, where students who failed the exit exam earn diplomas if they have a grade-point average equivalent to that of students at the same school who took the same course in math or English and passed the exit exams (Thurlow, Vang, and Cormier 2010; McIntosh 2012; Washington Department of Education 2013). This option is offered to students in their 12<sup>th</sup> grade year who have a 3.2 cumulative grade point average (GPA) or higher across all courses.

The state of Georgia offers a waiver that enables students who failed the Georgia High School Writing Test (GHSWT) and the Georgia High School Graduation Tests (GHS GT) to earn a diploma only if they obtained a scale score that falls within one standard error of measurement of the passing score (Thurlow, Vang, and Cormier 2010; McIntosh 2012; Georgia Department of Education 2013). The student must also meet the following requirements: (1) the student has attempted the assessment at least 4 times, (2) the student has successfully completed a structured remedial class after each attempt to pass the relevant sections, (3) the student has passed any 3 of the 5 high school graduation assessments, (4) the student has met the course unit requirements for graduation, and (5) the student has a 90% or better attendance record, excluding excused absences. The waiver process begins with the student, or the student’s parent or legal guardian,

submitting a request in writing to the local superintendent of the district that the student attends or attended.<sup>23</sup>

The effects of a waiver as a measure of graduation standards are dependent upon its criteria. Not only must waiver requirements be made clear to students, but the requirements must be strict enough to maintain the integrity of the credential and also flexible enough to maximize opportunities for deserving students. Across the nation, many states miss the mark on providing balanced criteria. In Indiana, for example, one of its two waivers, the Evidence-based waiver, may be obtained simply by acquiring a letter of recommendation from a teacher acknowledging that the student has met proficiency in state standards through coursework (Thurlow, Vang, and Cormier 2010; McIntosh 2012; Indiana Department of Education 2013). This waiver has received criticism for its lax criteria and abuse, which has resulted in a disproportionate number of poor and minority students graduating high school without the skills needed to succeed (Alliance for Excellent Education 2013). Other states, meanwhile, have criteria that are too stringent. In Georgia, students must pass 3 out of 5 assessments to qualify as well as have their score for the exam in which they are seeking a waiver fall within one standard deviation of the passing score (Thurlow, Vang, and Cormier 2010; McIntosh 2012; Georgia Department of Education 2013). While this option provides some flexibility for students who barely failed an exit exam, it is still heavily reliant on standardized test performance. This may explain why only 0.02% of all Georgia graduates in 2010-2011 graduated by exercising this option (McIntosh 2012; Georgia Department of Education). Waivers, when designed appropriately, have vast potential to assist students who have trouble with traditional exit exams to receive a high school diploma. However, to accomplish this goal, waivers must take into account why they are necessary in the first place and not rely too heavily on standardized exit exams.

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### **iii. SUBSTITUTE EXAMS**

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Eight of the 25 states with exit exams, including NYS, offer alternative pathways for students to graduate via substitute assessments (Appendix III). These assessments are published standardized tests, such as AP exams, the PSAT, the ACT, the SAT, and IB exams. Although states use these tests in lieu of exit exams, they may set different cut scores depending on grade level or content area. For example, in Maryland students earn a 3, 4, or 5 on the AP exam or a 5,

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<sup>23</sup> The following information must be included in the waiver request, in addition to the specified criteria: (a) specific facts that would justify the waiver, (b) the reason why the waiver requested would serve the purpose of the underlying requirement, and (c) written permission for the Georgia Department of Educational staff to receive all records that pertain to the request.

6, or 7 on the IB exam to waive out of the respective English, math, or biology exit exams (Thurlow, Vang, and Cormier 2010; McIntosh 2012; Maryland Department of Education 2013), while in Virginia students may earn as low as a 2 on either an AP or IB exam to meet graduation requirements (Thurlow, Vang, and Cormier 2010; McIntosh 2012; Virginia Department of Education 2013).

In Washington, a student can demonstrate the key skills assessed by his or her exit exams by scoring 3 or higher on specified AP tests or earning the state designated score on the SAT or ACT. The scores on the SAT that must be met or exceeded are 470, 350, and 380, for math, reading, and writing, respectively (Thurlow, Vang, and Cormier 2010; McIntosh 2012; Washington Department of Education 2013). The scores on the ACT that must be met or exceeded are 19, 13, and 15, for math, reading, and writing, respectively. There are a number of AP tests that count toward this option, such as Calculus or Statistics for math; English Literature and Composition, Macroeconomics, Microeconomics, Psychology, United States History, World History, or Comparative Government and Politics, for reading; and English language and Composition for writing. The student pursuing this route must take the relevant exit exam at least once, regardless of whether he or she already took and met the standard on one of these other tests. Students may be reimbursed for these tests if they are to be used to demonstrate proficiency in one or more content areas.

Substitute exit exams such as the AP and SAT very much resemble traditional exit exams in format. These substitute exams also tend to be geared toward students who are high-achieving or in schools with greater resources. Thus, students who do not have access to AP courses or who are not college bound have fewer opportunities to show mastery of standards than other students in the same state, district, and even school. Complicating matters is the fact that these students are likely to be poor, Black or Hispanic, ELLs, or disabled. This could be why there is low use of this pathway in some states, including New York. Since these options look no different than traditional exit exams, students do not bother taking advantage of these paths or also fail to graduate via this route (Hemelt and Marcotte 2013).

## VI. Recommendations

This paper has documented the graduation crisis in NYS as well as provided a sample of state policies that attempt to allow students to show they meet standards without having to pass standardized tests. We noted that policies intended to modify graduation requirements are still a changing landscape, and alternative assessment-based pathways, despite their promise, are still underdeveloped nationally as a result of various design and implementation challenges. NYS has a significant opportunity to learn from the efforts of other states and lead the country forward in developing multiple pathways to a diploma that meet the needs of the diversity of students in the state. Accordingly, we provide NYS with a set of recommendations to develop a cohesive system of graduation pathways.

Each of our recommendations is grounded in the belief that all pathways should provide equal opportunities for ALL students to demonstrate mastery of the same standards and lead to the same high school diploma, which will communicate to students, parents, and potential employers and postsecondary institutions that the student has successfully met the standards for graduation. High school exit options such as NYS's local diploma and Career Development and Occupational Studies Commencement Credential, which are targeted toward students with disabilities, are beyond the scope of this paper. Also, inherent in our recommendations is the understanding that students with interrupted schooling or high mobility due to circumstances beyond their control, or who are new to NYS in high school, should be able to access the recommended pathways even if they miss application deadlines. In addition, we expect that students with disabilities and ELLs would be provided with the necessary accommodations and resources needed to succeed in each of these pathways.

Our recommendations are intended to be viewed together, rather than as alternative options for reform. Specifically, our recommendations are as follows:

### **Recommendation A**

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#### **Reduce the Number of Exit Exams Required to Graduate with a High School Diploma from 5 to 3.**

Currently, NYS has more exit exams than 19 of the 25 states that require them. As outlined in Section III, this overemphasis on exit exams impacts student instruction and graduation rates.

We recommend that NYS reduce the number of exams required to obtain a high school diploma from 5 to 3 with the following provisions:

- ▶ The English Regents, one Math Regents, and one Science Regents would still be required for graduation. This recommendation is in line with states such as New Jersey, Maryland, Florida, and Indiana. Maintaining these exit exams would also give NYS the flexibility to use these assessments to comply with federal testing requirements.
- ▶ All other Regents exams would remain optional and available for students who choose to take them in order to graduate with a Regents Diploma with Honors or Advanced Regents Diploma. The number, types, and sequence of credits required to graduate would not be affected. Students would still have to fulfill the same course requirements to receive a high school diploma.

## **Recommendation B**

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### **Develop a Pathway to Graduation That Allows All Students to Demonstrate Their Knowledge and Skills through State-Developed and/or Approved Performance-Based Assessments.**

NYS should provide students with the option to demonstrate their attainment of high school standards in ways other than standardized assessments. Specifically, in lieu of each of the three Regents exam requirements described in Recommendation A, NYS should offer performance-based options, developed by the State in conjunction with schools and local school districts, which allow students to show their attainment of standards by completing a series of tasks/projects in contexts that are familiar and relevant to their high school experiences. As these assessments are being developed, NYS should ensure performance indicators are clearly defined and validated with stakeholders, clear guidelines for scoring are developed, scorers who know the standards being assessed are recruited, and scorers are trained to reach high levels of agreement in using a checklist, rubric, or other scoring method.

## **Recommendation C**

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### **Build More Flexibility and Support into the Current System to Make it More Accessible to Students.**

While more flexibility will not on its own be sufficient to address low graduation rates, the State's current set of graduation requirements could be made accessible to more students. Specifically, we recommend that the State:

- ▶ Expand the Regents exam appeal process by (1) using a standard deviation approach to determine the cut-off score to apply for an appeal;<sup>24</sup> (2) employing a combined score approach where the student must earn a designated combined score for each of the required Regents exams, even if the student does not pass each individual exam; and (3) allowing students to appeal all exit exams and still receive a high school diploma.
- ▶ Provide multiple options for assessing students in CTE programs, including state-developed or approved assessments that do not rely on standardized testing. These assessments may replace requirements to pass Regents exams for students who choose to pursue a CTE course of study.
- ▶ Provide an array of programmatic options and supports for students who have difficulties moving through a given pathway using evidence-based interventions, which may include tutoring, additional class-based instruction, social emotional learning opportunities, programs designed for over-aged/under-credited students, and after-school learning opportunities.
- ▶ Ensure that the appropriate accommodations and supports are provided to students with disabilities and ELLs to guarantee their fair participation in NYS's assessment program and the available pathways to high school graduation. For example, for ELLs, the State should expand the availability of Regents exams offered in students' native languages.

## **Recommendation D**

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### **Ensure Transparency in Communications and Monitoring of All Aspects of the Multiple Pathways System.**

Communication is vital for ensuring student access to the various pathways recommended. Monitoring student outcomes with respect to each pathway is also crucial to guarantee that they are being implemented correctly and as intended. In order to ensure access to information and transparency:

- ▶ NYS must provide and communicate to students, families, and school professionals clear, concise, and easy-to-follow information on all of the alternative pathways that are available to students to receive a high school diploma. For immigrant parents who are limited English proficient, as well as students who are ELLs, this information should be

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<sup>24</sup> A standard deviation is a measure of the dispersion of a set of data (how widely spread data points are) from its mean. The more spread apart the data, the higher the standard deviation. Standard deviation is calculated as the square root of the variance of a set of data points. By using the standard deviation to determine a cut-off, we take into account yearly volatility in exam scores resulting from things such as changes in the rigor of the exam or the characteristics of students taking the exam.

communicated in their native language. While NYS is transparent with their extensive graduation requirements, it needs to do a better job of communicating the limited alternatives currently available, such as the Regents exam appeal option or the ability to substitute a Regents exam with a comparable exam such as the SAT II, IB, or AP exam. The experiences of other states, where pathways usage rates have been low, reinforce the need for clear communication.

- ▶ NYS must collect and disclose detailed outcomes data, including usage data on the specific diplomas and the pathways that students have taken to earn a high school diploma, as well as data that allow for comparison of outcomes across multiple student groups. This practice will allow NYS to assess fidelity of implementation and make any improvements to the system for the benefit of all students.

## Conclusion

While no state has found the perfect balance, other states' experiences may prove instructive as NYS creates a new array of exit options for high school students. By adopting our recommendations, NYS could significantly increase access to a high school diploma for a more diverse student population. Going forward from here, all pathways to be developed by the State—including instructional pathways currently being considered for CTE, the humanities, the arts, and Science, Technology, Engineering and Math (STEM)—must be designed to be accessible to the wider range of student populations, including ELLs and students with disabilities. NYS needs to provide all students with a menu of options to earn a high school diploma that offers learning opportunities and assessments that bring out the best in all students.

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# Appendix I

Members of the Coalition for Multiple Pathways to a Diploma include the following organizations and individuals:

Advocates for Children of New York

Alliance for Quality Education

Annenberg Institute for School Reform

ARISE Coalition

David C. Bloomfield, Esq., *Professor of Educational Leadership, Law & Policy, Brooklyn College and The CUNY Graduate Center*

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

Center for Independence of the Disabled, New York

Citizens' Committee for Children of New York

Council of Family and Child Caring Agencies

CTE Technical Assistance Center of New York

Valerie DeClara, *Parent*

Ann Marie FitzPatrick, *Parent*

Good Shepherd Services

Green Chimneys Children's Services

Roberta Grogan, *Parent/Advocate*

Holly Gurnick, *Parent*

Hudson Valley Special Education Parent Center & Transition Resource Center

Jill Lewis-Flood, *Parent*

Meghan Healy

Internationals Network for Public Schools  
Learning Disabilities Association of New York State  
Long Island Advocacy Center  
Long Island Communities of Practice  
Long Island Parent Center  
Noreen Maher, *Parent*  
Diana Mendez, *Parent*  
Mental Health Association of New York City  
Neighborhood Family Services Coalition  
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 Rehabilitation Association  
New York State Teachers of English to Speakers of Other Languages (NYTESOL)  
Parent to Parent New York, Inc.  
Queens Community House  
Resources for Children with Special Needs  
Lynn Russo, *Parent*  
Tracey Shannon, *Parent*  
The Advocacy Center  
United We Stand  
Upward Bound, Metropolitan Center for Urban Education, New York University  
Marcia Vogel, *Parent/Advocate*

## Appendix II

### Exit exams and alternative pathways to a high school diploma, by state, 2013

State	Exit Exam Required	# of Exams Required	Subjects Tested	Notes
Alabama	●	1	Language, Reading, Math, Science, Social Studies	State is transitioning to EOC exams, which students will not have to pass in order to graduate.
Alaska	●	3	Reading, Math, Writing	
Arizona	●	3	Reading, Math, Writing	State exam will be phased out in 2014 in favor of PARCC and will be part of course grade.
Arkansas	●	2	Algebra I, English II (2015)	
California				State law recently passed eliminating most standardized assessments.
Colorado				State considering proposal to implement EOC exams in 2014-15.
Connecticut				State exam administered in 10 <sup>th</sup> grade, but passing score not required for graduation.
Delaware				EOC exams for Algebra II, English, and Biology are administered, but not required for graduation.
Florida	●	2-4	Reading, Algebra I, Geometry, Biology I	Requirements depend on cohort. Current 9 <sup>th</sup> graders will have to pass 4 exams.
Georgia	●	5	English language arts (ELA), Math, Science, Social Studies, Writing	
Hawaii				
Idaho	●	1	Math, Reading, Language	
Illinois				
Indiana	●	2	Algebra I, English 10	
Iowa				
Kansas				
Kentucky				
Louisiana	●	3	English II or III; Algebra I or Geometry; Biology or American History	
Maine				State will transition ELA and Math assessments to SMARTER Balanced Assessment Consortium (SBAC) in 2014.

State	Exit Exam Required	# of Exams Required	Subjects Tested	Notes
Maryland	●	3-4	Algebra, English 10, Biology; Possible addition of Government	
Massachusetts	●	2	ELA, Math	
Michigan				
Minnesota	●	3	Reading, Math, Writing	Exit exams are being phased out in 2014 in favor of career/college assessments and grade 11 College Entrance Assessment.
Mississippi	●	4	Algebra I, Biology I, U.S. History, English with Writing Component	
Missouri				
Montana				
Nebraska				
Nevada	●	4	Math, Reading, Science, Writing	
New Hampshire				
New Jersey	●	1	Reading, Math, Writing	
New Mexico	●	1	Reading, Math	Passing scores are determined at district level.
New York	●	5	ELA, Common Core Math, Global History/Geography, U.S. History/Gov't, Science	
North Carolina				Exit exam implemented in 2002 has apparently been phased out.
North Dakota				
Ohio		5	Reading, Writing, Math, Science, Social Studies	
Oklahoma	●	4	English II, Algebra I; plus 2 of: English III, Algebra II, Geometry, Biology I, U.S. History	
Oregon	●	3	Reading, Writing, Math Application	
Pennsylvania				Exams not currently required, but will be instituted with the Class of 2017.
Rhode Island	●	2	ELA, Math	
South Carolina	●	2	ELA, Math	A 2013 bill proposes the elimination of state tests as graduation requirements. <sup>25</sup>
South Dakota				
Tennessee				

<sup>25</sup> For more information about the South Carolina bill, see <http://www.thestate.com/2013/04/21/2734759/bill-would-end-exit-exam-as-a.html>.

State	Exit Exam Required	# of Exams Required	Subjects Tested	Notes
Texas	●	5	ELA, Math, Science, Social Studies	
Utah				State has phased out exit exam requirement.
Vermont				
Virginia	●	6	2 English, 1 Math, 1 Lab Science, 1 History & Social Science, 1 Student Selected Test	State requires students to take EOC exams for most general education courses.
Washington	●	3	Algebra I/ Integrated Math I or Geometry/Integrated Math 2; Biology I (as of 2015)	
West Virginia				
Wisconsin				
Wyoming				

**Sources:** Thurlow, Vang, and Cormier (2010); McIntosh (2012); Unpublished Advocates for Children Analysis (2013)

# Appendix III

## Overview of pathways to a standard high school diploma offered in other states, 2013

State	Performance-Based Assessment	Waiver	Substitute Exam	Notes
Alaska		●	●	To be eligible for the waiver, any of the following must apply: the student arrives in the state within the final 2 semesters of graduation; parent dies within the last semester of graduation; a serious/sudden illness, or a physical injury prevents the student from taking the exam in the final semester of graduation; a disability arises too late to develop a valid assessment; a student has passed a competency exam in another state that assesses the same content areas, and is a high school exit exam.
Florida			●	Students who attempt passing the Florida Comprehensive Assessment Test (FCAT) at least 3 times without passing may substitute scores from an ACT or SAT.
Georgia		●		There are 2 waivers: variance and hardship. For the variance, the student must have 90% attendance. The student's highest scale score must fall within one standard error of measurement for passing the relevant section of the exit exam; the student must also successfully pass each related EOC exam, where applicable, for the sections of the exit exam in which the variance is sought.
Indiana		●		There are 2 waivers: evidence-based and work-readiness. Students must take exit exams at every opportunity to receive either waiver. For an evidence-based waiver, a student must obtain recommendation from a teacher of the subject area in which the student has failed the exam. The recommendation must be approved by the school principal and be supported by documentation that the student has met standards in the subject area. For the work-readiness waiver, students must complete the course and credit requirements for a general diploma, maintain a least a "C" average, and have 95% attendance.
Maryland	●	●	●	Students are also allowed to meet a combined score minimum even if all tests are not passed with proficiency.
Massachusetts	●	●		To apply for the waiver/appeal, students must meet a minimum score, fail the exam 3 times for ELA or math, 1 time for science, have 95% attendance, and must have participated in school sponsored academic support services in the subject for which the appeal is filed.

State	Performance-Based Assessment	Waiver	Substitute Exam	Notes
Minnesota			●	Students may use the ACT, WorkKeys, Compass, Armed Services Vocational Aptitude Battery or other district-determined equivalent assessments to satisfy graduation requirements.
Mississippi	●			Students who fail the exit exam twice, but mastered the subject area are eligible to appeal to substitute a portfolio of evidence. Once the State Appeals Substitute Evaluation Committee determines that submitted evidence indicates mastery, a passing score is given.
New Jersey	●			When a student fails at least 1 section of the grade 11 exit exam, the school arranges for the students to take mandatory special instruction targeted to the area failed. The student then must pass 2 Performance Assessment Tasks (PATs) for each cluster in the failed content area.
New York		●	●	Student must earn a score within 3 points of the 65 required to pass an exam before submitting appeals, as well as meet other criteria (including attempting the exam 2 times). Principals form committees that review appeals.
Nevada	●			Students may submit other work completed during high school to demonstrate proficiency for writing and science. To be eligible for this alternate route, students must have done the following by the end of the first semester of grade 12: failed the selected test twice; (b) earned a GPA of at least 2.75; passed the reading and math exit exams; and (d) be on schedule for earning the credits required for graduation.
Ohio		●		Students must demonstrate a combination of passing test scores with attendance, grades, recommendation letters, participation in remediation classes, etc.
Texas			●	Students may substitute the ACT or SAT.
Virginia			●	Students must earn state designated proficient or advanced score on a range of substitute assessments (e.g., AP, Cambridge International Examinations, WorkKeys) approved by the State Board of Education in each of the required content areas.
Washington	●	●	●	Students may use GPA, other exams, and/or compilation of prior work to receive waiver.

**Sources:** Thurlow, Vang, and Cormier, (2010); McIntosh (2012); Unpublished Advocates for Children Analysis (2013)