NYSUT White Paper on College, Career & Civic Readiness

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Executive Summary

NYSUT White Paper on College, Career and Civic Readiness

This white paper analyzes the state's process for establishing its current college and career readiness benchmarks; identifies serious deficiencies in the state's methodology that are promoting developmentally inappropriate test questions and creating a false narrative of failure about New York state's students and schools; and recommends actions to establish new, developmentally appropriate standards for college and career readiness.

PROBLEMS WITH NEW YORK STATE BENCHMARKS

The state's new benchmarks for student test scores are now set so high that to achieve proficiency, all New York state students theoretically are required to score as well as or higher than two-thirds of all college-bound students nationally. This inappropriately high bar was caused in large part by the state's decision to artificially align its grades 3–8 test "cut points"— the scores that are established as benchmarks of proficiency or mastery — to randomly selected external measures. Our examination of the state's process for determining benchmarks of student proficiency shows it is based on data that has no relationship to the grades 3–8 assessments — in fact, the benchmarks were established before the assessments were actually administered to any of the state's students.

The state set its grades 3–8 proficiency benchmarks in 2013 using a bookmarking method that differed from the usual process because it was tightly directed and based on external and unrelated measures:

- the percent of New York state students deemed proficient by the National Assessment of Educational Progress (NAEP); and
- the percent of New York state students attaining the State Education Department's (SED) empirical definition of college readiness based on a College Board analysis of SAT and PSAT exam scores and student success in the first year of college; and
- a one-year study of New York City high school students attending the City University of New York (CUNY) and their results on Regents Exams that have since been redesigned.

In the method called bookmarking, after test questions are placed in order of difficulty from easiest to hardest, content area educators are asked to place a "bookmark" at the point between the hardest question borderline test-takers would be likely to answer correctly and the easiest question the borderline test-takers would not be likely to answer correctly. If assessments are aligned with the state student learning standards for college and career readiness, then setting bookmark-determined benchmarks on the actual assessments should reflect a true picture of student progress. Done correctly, this method appropriately addresses actual test content. Instead, SED's recent tightly directed process dictated that only a pre-determined percentage of students would be proficient based on unrelated external assessments. After arbitrarily establishing a pre-determined "proficiency" benchmark based on the unrelated, and in some cases obsolete assessments, then SED Commissioner John King subsequently predicted in April of 2013 that the percentage of students considered proficient on the state's newly developed 3–8 English language arts (ELA) and math assessments would drop by 30 points. That, indeed, was the result — not surprising, because the commissioner knew in advance that the proficiency benchmark, aligned as it was to external measures, would result in a huge drop in student scores. In another example of this circular type of reasoning, a recent analysis determined that New York state benchmarks are aligned with NAEP. That is not, however because the state's assessments are synched — in difficulty or content — to NAEP, but because the state purposefully set its benchmarks to mirror the proficiency rates on the NAEP.

Similarly, the state's benchmarks for mastery on its high school math and ELA Regents exams were based on small scale studies of student performance on outdated exams that have since been redesigned. In 2010, the Board of Regents adopted its College and Career Readiness Workgroup's proposed cut points for mastery on high school Regents exams in math and ELA. These aspirational benchmarks, set in place before adoption of the Common Core, were based on a one-year study of New York City public high school students who entered the City University of New York in the fall of 2008. The study relied on the students' scores on the English Regents examination (the two-day, six-hour comprehensive English Regents that has since been redesigned) and their results on Math A and B Regents exams, which have subsequently changed twice since then. Based on this very limited study, the Regents accepted the workgroup's findings that the aspirational scores of 75 on the ELA Regents and 80 on the math Regents exams should be used as a proxy measure for college readiness.

There are no published peer-reviewed studies to support the finding that two specific Regents exams are reliable indicators of college readiness. However, there are numerous studies that indicate that student success in high school courses, in combination with SAT and ACT scores, are good predictors of college success.

High expectations for all students are essential to ending achievement gaps and are embraced by educators and parents. But the state's flawed methodology for establishing proficiency benchmarks has resulted in thousands of students being inappropriately labeled as unfit for college or career — even as multiple valid measures attest to their readiness.

REDEFINING COLLEGE AND CAREER READINESS

Just as it did with its rushed, top-down implementation of Common Core, the state imposed inappropriate college and career readiness benchmarks without necessary input from stakeholders, and most egregiously, without clearly defining and/or fully recognizing the continuum of college and career readiness.

While we endorse the importance of a clearly defined vision of college and career readiness for all students, the state rolled out massive changes in standards and testing based on a definition of public education that was insufficiently articulated and too limited in scope. Public education's mission goes beyond college and career readiness, as vital as those objectives are. Our public schools also have the responsibility of educating generations of citizens who can engage fully in a democratic society. Our mission includes cultivating in students an appreciation of the arts, music and technology for the enrichment they provide to the life of our communities. Constricted definitions of college and career readiness have resulted in a narrowing of what should be a robust vision of the curriculum.

THE IMPORTANCE OF MULTIPLE PATHWAYS

To address student preparation for career readiness, the Board of Regents in January 2015 approved multiple pathways to graduation and changes to diploma requirements. These essential new pathways to graduation have been created for students in the arts, humanities, science, Technology, Engineering and Math (STEM), languages other than English (LOTE) and Career and Technical Education (CTE). The pathways were designed to provide alternative comparable, rigorous routes to two-year and four-year colleges, additional career training, and employment.

While not all the options are yet available, 13 CTE exams have been identified as comparably rigorous to a Regents exam. Including CTE assessment as an alternative to a Regents Exam signifies that New York state values CTE as highly as traditional academic subjects in preparing students to be career and college ready. This is an important commitment — but New York State needs to fully define, support and invest in Career and Technical Education as an important pathway for students.

RECOMMENDATIONS

- NYSUT urges the state's educational and political leaders to broaden and articulate a comprehensive vision of public education with broad input from parents, P-12 educators, employers and higher education faculty that fully addresses college, career and civic readiness and ensure that New York state student learning standards reflect and advance this vision.
- The state must commission a panel of educators and developmental psychologists to set new, developmentally appropriate standards, building on such input.
- NYSUT calls upon the state to scrap its current flawed system for establishing proficiency benchmarks for the 3-8 English language arts and math assessments that result in pre-determined failure rates based on random external assessments and reform its methodologies for setting benchmarks and proxy measures that are used to determine college and career readiness.
- NYSUT further calls on the state to examine the appropriateness of aspirational benchmarks for mastery in high school Regents exams in ELA and math.
- To design appropriate college and career readiness benchmarks, these key questions must be answered with broad input from parents, P-12 educators, employers and higher education faculty:
 - How do we define college and career readiness?
 - What appropriate data (rather than just available data) should guide this definition of college and career readiness?
 - How can New York state transform the flawed Common Core standards into clear, appropriate New York state standards for college and career readiness?
 - How should New York state graduation policy be changed to reflect this vision of college and career readiness?
- Standards must be written by New York state practitioners the experts at developing developmentally and grade-appropriate standards with strategies for students with disabilities, English language learners, and gifted and talented students. Practitioners who have used the state's Common Core Learning Standards should be significantly

involved in re-examining the standards' developmental appropriateness, especially at the early childhood and upper elementary levels.

- Standards should be introduced in kindergarten and progress through the grades so all students have a solid foundation for scaffolded learning. This would eliminate gaps in instruction that could affect the acquired knowledge of students.
- State test questions must be developmentally appropriate and aligned with valid college and career readiness standards.
- The state must make a strong commitment to and investment in multiple pathways to career and college readiness. The Regents plan to create a number of new pathways to graduation for students in CTE, STEM humanities and the arts, which NYSUT strongly supported, needs to be expanded and further developed. SED should incorporate the Career Development and Occupational Studies (CDOS) standards into the content of other curriculum standard areas.
- SED should continue to offer multilingual and bilingual students the State Seal of Bi-literacy when they are proficient in listening, speaking, reading and writing in English and another language. The State Seal of Bi-literacy is one way New York State students demonstrate their Global Competence.
- The impact of the Regents' College and Career Readiness agenda on special populations of students such as English language learners (ELLs) and students with disabilities (SWDs) needs to be addressed in a more comprehensive, systemic and responsible fashion. A clearly coordinated set of proposals is necessary to move the agenda forward for this population of students.
- The availability of a safety net for English language learners and students with disabilities should also be addressed in a more comprehensive manner. While a safety net is currently in place for ELLs and SWDs to obtain a local diploma, we recommend a wider safety net be considered as part of a comprehensive policy discussion that considers the unique needs of these students.
- It is time to consider other ways to demonstrate proficiency in subject area content. Performance-based assessments or other opportunities to demonstrate proficiency in the same state standards that are assessed through Regents exams must be explored.
- SED should develop a guidance document for implementation that includes awareness, transition and school readiness. A pipeline for communicating with parents and communities should be included in any implementation plan. Parents should be involved in reviewing any standards and provide feedback as they work with their children and teachers.
- Research-based, sound and appropriate professional development needs to accompany any revision and rollout of new standards. Teachers need the resources and tools to effectively transform instruction to align with new standards. Districts need to work with and support practitioners through professional development and resources.

The failures of Common Core implementation — lack of parent and teacher input, lack of resources, rushed roll-out, top-down decision making and one-size-fits all edicts — must be reversed. Educators, who are charged with protecting our students' wellbeing and their futures, stand against the state's unsupported benchmarking process that wrongly labels students and short circuits their dreams. We call for high New York state standards of college, career and civic readiness based on input from parents, educators, employers and higher education faculty. Our students deserve no less.

HOW NYS COLLEGE AND CAREER READINESS BENCHMARKS WERE ESTABLISHED and WHY THEY ARE THE WRONG BENCHMARKS

PROBLEMS WITH NEW YORK STATE BENCHMARKS

The New York State Education Department and the Board of Regents established aspirational scores of 75 or above on the English Regents exam, and 80 or above on a Math Regents exam in 2010. This became the de facto definition of college and career readiness in New York state. The New York state Education Department, in its ESEA Flexibility Request, defines college and career readiness in terms of an individual's performance on English and math Regents exams: "the aspirational goal of a 75 or above on the English Regents exam and a score of 80 or above on a math Regents exam is a suitable proxy for college and career readiness" (2012).

The State Education Department (SED) redefined "proficiency" on its grades 3–8 mathematics and ELA assessments in 2010 to mean that a student is on track to score an 80 or better on the math Regents exam and a 75 or better on the English Regents exam.

The following is a discussion of the flawed process that SED used to determine grades 3–8 proficiency, and the aspirational scores of 75 or above on the English Regents and 80 or above on the math Regents.

2010 College and Career Ready Regents Cut Point Changes

In November 2009, the Board of Regents created a College and Career Readiness workgroup. The workgroup was charged with developing recommendations for possible changes to the New York State high school diploma requirements and Regents exams to better align them with college and career readiness, as well as reviewing of the GED policy and program.

In April 2010, the workgroup was presented with updated information on P-12, Higher Education and national data, including:

- An analysis of Regents exam performance for the 2001–05 cohorts and projections for the 2005–08 cohorts;
- Information on trends in demographics, college enrollment and remediation; and
- Research from the New York Comprehensive Center on high school examination systems in other states and countries.

The workgroup asked for additional data, including disaggregated Regents exam data by race, ethnicity, gender, English language learners, rural/urban, big city/small city, etc. It also asked for the same disaggregated information for the general education population and the special education population. The workgroup also requested information on course requirements and exam requirements in Tennessee and Delaware.

A panel consisting of four representatives from all sectors of higher education (SUNY, CUNY, Independent Colleges and Proprietary Colleges) discussed college readiness challenges in New York State. The panel provided input to the Board of Regents and answered questions relating to New York's high school graduates and how well they are prepared for college. There was consensus from this panel that too many New York State students are lacking critical thinking, written expression, and problemsolving skills. Students need more work in these non-academic areas and also in time management and study skills. The panel discussed how college remedial courses are unsuccessful if the student is not largely college ready and noted that 75 percent of students entering the CUNY Community College system need remediation.

In July 2010, the discussion of standardized tests as a benchmark for college and career readiness in New York state intensified when SED presented information positing a relationship between Regents exam scores and students' college readiness. Sweeping conclusions subsequently were based on a one-year CUNY report, *Relationship of Regents ELA and Math Scores to College Readiness Indicators*, and an SED telephone survey of admissions directors from two- and four-year public and private colleges across the state.

In a slideshow presentation at the July 2010 Board of Regents meeting entitled, *A New Standard for Proficiency: College Readiness,* the conclusion from the telephone survey SED presented to the Board of Regents was that admissions directors of two- and four-year public and private colleges in the Western NY, Central NY, Hudson River and New York City regions said that a Regents exam score of 75 to 85 on the Regents is considered by selective schools (as part of their holistic review of applicants) the lower threshold for admissions (SED July 2010). Also presented in the slideshow was the assertion that a 75 on the Regents is a threshold for placement in remediation for CUNY. In fact, all CUNY students are required to take the CUNY Mathematics Placement Test as indicated in the Howard T. Everson memo, *Relationship of Regents ELA and Math Scores to College Readiness Indicators*, sent to then-Commissioner David Steiner.

The CUNY report was based on the performance of graduates of New York public high schools who entered CUNY in the fall of 2008 with Math A and/or Math B test scores. These were students applying to, and accepted in, one of CUNY's four- and/or two-year colleges. There is no breakdown of the number of students who entered two-year or four-year programs or the actual admission requirements of the various CUNY institutions.

The following conclusions were reached by Howard Everson in the memo sent to SED:

- Students who scored below 80 on the Math A Regents exam were likely to be placed in remedial, non-credit bearing courses.
- Once in college, students who scored 80 or above on the Math A Regents exam have more than a 60 percent chance of earning a 'C' or better in their first college-level math course.
- CUNY looked at the fall 2003 freshmen CUNY cohort, cross-tabulating SAT scores of students with Math I Regents and Math A Regents exam scores to determine that a Regents exam score of 75 is roughly equivalent to a 500 on the SAT, considered by CUNY to be another common benchmark of college readiness.

The CUNY study looked at the same cohort of students — those entering in the fall of 2008 — and their Regents English scores. Students who had an English Regents score of 65 or higher were found to have a 75 percent probability of earning a grade of 'C' or higher in the CUNY freshmen composition courses. The probabilities were close to 85 percent for earning a grade of 'C' or higher in the CUNY freshmen composition courses for those students whose English Regents scores were between 75–80. CUNY looked at the fall 2003 freshmen CUNY cohort to conclude that an English Regents exam score of 75 is roughly equivalent to a 500 on the SAT.

An additional slide from the July presentation titled: *Nearly a quarter of students in all NYS two- and four-year institutions of higher education take remedial coursework* showed the remedial coursework for public, independent and proprietary two- and four-year institutions of higher education from 1998–2007. In the SED presentation, remedial coursework at four-year institutions had been steadily decreasing to a 10-year low of 13 percent. The data presented for all institutions (two- and four-year) shows a slight decrease to 24 percent (SED 2010) and the two-year remedial coursework rate was 44 percent.

Scores of 75 or higher on the English Regents and 80 or higher on the math Regents were determined to be aspirational college and career ready expectations at the July 2010 Board of Regents meeting. This was done without necessary input from stakeholders, additional research or data and with no consideration of career or civic ready expectations. Based on these aspirational scores, SED redefined "proficiency" on its grades 3–8 mathematics and ELA assessments in 2010 to mean that a student is on track to score an 80 or better on the math Regents exam and a 75 or better on the English Regents exam.

Policy decisions that led to changes in the 2010 proficiency cut-score adjustments for grades 3–8 ELA and math were based on two major factors:

- 1. Changes in the test administration window between the 2008–09 and 2009–10 school years (See Appendix 1 for a timeline of test administration dates and changes to testing and standards).
- 2. The decision to align the proficiency standards with grade 8 student performance on the New York state Regents exams in math and English.
 - a. Grade 8 proficiency Level 2 cut scores were raised to reflect 75 percent probability of achieving a Math A Regents score of 65 or above and Level 3 cut scores were raised to reflect 75 percent probability of achieving a Math A Regents score of 80 or above. (Math A is no longer administered.) Similarly, grade 8 ELA proficiency Level 2 cut scores were raised to reflect 75 percent probability of achieving an English Regents score of 65 or above. Grade 8 ELA proficiency Level 3 cut scores were raised to reflect 75 percent probability of achieving an English Regents score of 65 or above.
 - b. A grade 8 student scoring above Level 2 is on track to pass the math or English Regents exam and a grade 8 student scoring at or above Level 3 is on track to earn a college-ready score on the Regents exam.
 - c. Grades 3–7 ELA and math Level 2 and 3 cut scores were raised to reflect the corresponding academic rigor of the grade 8 adjusted cut scores by holding the national percentile rank associated with each grade's cut score equal to the national percentile rank associated with the grade 8 cut score. The national percentile ranks were computed based on New York State student performance on CTB/McGraw-Hill's TerraNova test battery. (2010)

SED published college and career ready graduation rate calculations showing the percentage of students graduating from high school with these aspirational scores of 80 or better on the math Regents exam and a 75 or better on the English Regents exam.

The class of 2022 (i.e., students who first enter grade 9 in the 2018–19 school year) would be the first group of students required to pass Common Core Regents Exams (ELA and one exam in math) at the aspirational college and career readiness level (comparable to the existing 75/80), indicating that they met Common Core course-level expectations (2014). The current passing rate is 65 on a Regents exam. Many students take Algebra in ninth grade. They would be expected to pass the Algebra (CC) Regents with a score of 80 or above in the 2018–19 school year (See Appendix 2 for a chart on changes to standards, testing, test time administration and changes to cut scores for a student beginning kindergarten in the fall of 2004 and graduating in 2017).

There are serious weaknesses underpining assertions that college and career readiness should be based solely on an individual's performance on the English Regents and a math Regents, and that those scores

of 75 and 80, respectively, are the right scores to determine grades 3-8 proficiency, based on limited research. They include:

- There is no indication of the number of admissions directors who participated, no breakdown of type of school or any indication of what the admission requirements for the schools that participated in the phone survey might be.
- While remediation rates at four-year colleges were decreasing, total enrollment at four-year public colleges in New York state increased 17.5 percent from 2000–10 and enrollment at public two-year institutions increased by 33 percent from 2000–10 (2012).
- The students in the CUNY 2008 sample were described as "recent graduates" with no definition for "recent."
- There is no information on the time elapsed between a student taking the Regents and being placed in a CUNY math course. If a student had not taken a math course in a few years there might be a need for some remediation apart from general standards of readiness.
- The analysis was unclear on whether students were general education, special education or English language learners.
- The math Regents referenced in the data is no longer current. The last administration of Math A, based on the 1996 standards, was January 2009.
- The 2003 CUNY freshmen college cohort data for SAT comparisons used Math I Regents results and Math A results. Math A was first administered in 1999 and Sequential Math I was phased out. The CUNY Regents comparison to college readiness uses Math A results when Math A was last administered in January 2009 and Algebra I was first administered in June 2008. Thus the results should not have been applied to the then-current math Regents and should not be applied going forward.
- Passage of one math Regents exam is required for a Regents Diploma. This expectation differs from grades 3–8 ELA and math tests which have no consequences preventing advancement or graduation.
- The English Regents exam referenced in the data is no longer current. The two-day, six-hour English Regents was replaced with the one-day, three-hour English Regents in 2010–11.
- The passing rate was raised from 55 to 65 on Regents exams for those students entering high school in 2008. Students in the CUNY study would have been able to graduate high school with passing scores of 55 on their Regents exams, not the current standard of 65.
- The purpose of a Regents exam is to measure the academic content knowledge and skills acquired in a particular course. It is not intended to predict college placement.
- CUNY's own freshmen admission profile for the fall class of 2012 shows huge variance in the mean SAT scores of four-year CUNY Institutions. Mean SAT scores ranged from a combined (critical reading and math) score of 795 to 1275 for CUNY four-year colleges. A score of 795 is well below the score of 1000 that CUNY recommended as a benchmark for college readiness (2012).
- Students had begun instruction on the revised (2005) math standards in the 2005–06 school year.
- The 2009–10 grades 3–8 assessments were aligned to the 2005 math standards, not the 1996 standards Math A was aligned to.
- An assumption was made that New York state student growth is similar to the growth pattern obtained from a national sample.
- Even though the Regents higher education panel identified the need to address critical thinking, written expression, and problem-solving skills along with time management and study skills these recommendations were never addressed.

SED Common Core State Standards Assessment Benchmarking Process

In spring 2013, New York state administered the first set of tests designed to assess student progress on the Common Core State Standards (CCSS) and whether students are on track to succeed in college and

careers. The new tests required a standard-setting process to establish the cut scores that determine levels of proficiency. An evidence-based, standard-setting process was used that included both external benchmark data to empirically define college readiness, as well as a content-driven, standard-setting methodology called the Bookmark Method.

External benchmark data from the College Board was presented to the benchmarking panel. The empirical definition of college readiness set by SED policy was developed using the results of the same CUNY study mentioned above and described as:

- ELA: 75 percent probability of a 'B-' or higher in college-level credit bearing courses;
- Math: 60 percent probability of a 'C+' or higher in college-level credit bearing courses in math.

Using both SAT and PSAT data, along with the validity data from the College Board (freshmen GPAs in more than 150 colleges across the country), and using both national and New York state student samples from the 2010 cohort, the College Board set the "cut scores" on the SAT and PSAT based on the empirical definition of college readiness. Next, the percentage of students at or above these "cut scores" was identified.

Assessment	NYS ELA CCR benchmark (75% probability of B- or higher)	College Board national recommendation (65% probability of B- or higher)
SAT Critical Reading	560	500
SAT Writing	530	470
Assessment	NYS Math CCR benchmark (60% probability of C+ or higher)	College Board national recommendation (65% probability of B- or higher)
SAT Math	540	610-630

COLLEGE READINESS BENCHMARKS

> NAEP External Benchmarks

The NAEP data supplied to the benchmarking panel are from the 2011 NAEP *The Nations Report Card* and are based on the percent of students performing at the proficient level on the NAEP assessments in New York state. Proficiency on the NAEP is defined as: solid academic performance for each grade assessed. Students reaching this level have demonstrated competency over challenging subject matter, including subject-matter knowledge, application of such knowledge to real-world situations, and analytical skills appropriate to the subject matter.



Source: New York State Testing Program 2013: English Language Arts Mathematics Grades 3-8 Technical Report, www.p12.nysed.gov/assessment/reports/2013/ela-math-tr13.pdf



Source: New York State Testing Program 2013: English Language Arts Mathematics Grades 3-8 Technical Report, http://www.p12.nysed.gov/assessment/reports/2013/ela-math-tr13.pdf

Panelists (typically content-area educators) were asked to articulate performance expectations for students given the Performance Level Descriptors, the threshold descriptions, the review of test items, and external benchmark data from the College Board and NAEP. They were then asked to participate in a process called the Bookmark Method. The panel was given all of the questions from the test in order by difficulty, from easiest to hardest. Panelists were asked to place a "bookmark" at the point between the hardest question borderline test-takers would be likely to answer correctly and the easiest question the borderline test-takers would not be likely to answer correctly.

The panelists were asked to start with the first question and consider whether a borderline test-taker is likely to answer that question correctly. If the answer is "yes" they proceed to the next question. At the first question to which they answer "no," they place their bookmark. Since more than one cut score was being set, the panelists would continue through the booklet asking the same question for the borderline student in the next higher level. Once the bookmarking took place, panelists were able to compare and discuss the impact data (percentages of students at or above the suggested cut scores), external benchmarks and performance expectations associated with their recommendations at each grade/subject.

However, SED guided the benchmarking panel to place the bookmarks where the impact data would meet the external benchmark data. This manipulation of the process resulted in the benchmarks for the newly designed Common Core assessments, purported to be aligned with college and career readiness, to be set in an artificial, arbitrary way that does not reflect actual performance on the standards of these assessments. It instead dictates an artificially low percentage of students performing at a proficient level on the assessments based on external benchmarks.

Subject Level		Grade 3	Grade 4	Grade 5	Grade 6	Grade 7	Grade 8	
ELA	Level 1	45	33	39	36	35	34	
	Level 2	24	36	30	34	37	35	
	Level 3	27 31%	21 30%	22 30%	16 30%	20 28%	18 31%	
	Level 4	4	9	8	14	8	13	
Math	Level 1	30	29	45	29	38	31	
	Level 2	35	35	25	40	34	41	
	Level 3	20 35%	24 37%	21 30%	18	20 27%	20 27%	
	Level 4	15	13	9	12	7	7	

NYS Benchmarks: Percentage of Students in each Performance Level based on Standard-setting Recommendations

Beyond the inappropriateness of the manipulation of the bookmarking process as described above, there are a number of reasons to be concerned about the use of NAEP and College Board proficiency numbers in benchmarking the New York state 3–8 Common Core assessments. They include:

NAEP:

- According to the research community, NAEP assessments lack validity. In fact, the science behind these benchmarks is so weak Congress insists that every NAEP report include the following disclaimer: "National Center for Educational Statistics (NCES) has determined that NAEP achievement levels should continue to be used on a trial basis and should be interpreted with caution."
- The NAEP proficiency benchmark is set so high it seems reachable only by students in a handful of jurisdictions, most typically those with an affluent population and accelerated courses of study.
- NAEP's definition of proficiency has little or nothing to do with proficiency as most people understand the term. NAEP experts think of NAEP's standards as "aspirational".
- The Washington Post analyzed NAEP as "A flawed benchmark producing the same old story."
- Research on NAEP suggests a fundamental disconnect between trends and scores on state tests and on NAEP tests. Student performance on state exams does not consistently align with student performance on the NAEP.

College Board:

- The New York state SAT Benchmarks for ELA are set much higher than the College Board percent probability of obtaining a first year GPA of 2.67 (B-) or higher.
- The College Board benchmark is also based on the relationship between SAT scores and performance in the first year of college, but it was developed by linking assessment scores to first-year grade point average, rather than to specific course grades. The methodology employed has resulted in discrepancies in the rates of college and career readiness estimated by ACT and College Board benchmarks.
- Using the PSAT/NMSQT benchmarks of college readiness should be considered along with other academic (i.e. high school grades, school projects, etc.) and nonacademic (i.e. motivation, college aspirations, etc.) factors to gain a more complete understanding of students' college readiness.
- A related concern is whether readiness for college is the same as readiness for a career and employment and whether the two should be combined into a single concept often labeled CCR. The current assessments ineffectively measure the multitude/diverse skills and strengths students possess.

Despite the inappropriateness of the state's process used to link standardized test scores with college and career readiness, the process has continued. Being college, career — and civic — ready is much more involved than the score on a standardized test. We urge educational and political leaders to move beyond defining goals of education in terms of student performance on standardized tests.

As a footnote to this discussion, in November 2015, the Vermont State Board of Education issued a memorandum to parents and guardians regarding the Vermont Comprehensive Assessment Program. Vermont uses the national "Smarter Balanced" consortium assessment. The board noted: "Tests are useful if used within the limits of their design but they cannot provide you with a comprehensive picture, by themselves. The State Board and Agency of Education support using a broad range of tools, measures and methods to help you and educators understand and improve your child's learning.

"We call your attention to the ... 'scale score and overall performance.' These levels give too simplistic and too negative a message to students and parents. The tests are at a very high level. In fact, no nation has ever achieved at such a level. Do not let the results wrongly discourage your child from pursuing his or her talents, ambitions, hopes or dreams.

"These tests are based on a narrow definition of 'college and career ready.' In truth, there are many different careers and colleges and there are just as many different definitions of essential skills. In fact, many (if not most) successful adults fail to score well on standardized tests. If your child's scores show that they are not yet proficient, this does not mean they are not doing well or will not do well in the future ...

"We must give every student a thorough and comprehensive education, and provide the nurturing and support each child needs to grow into an effective, productive and selfdirected citizen."

RECOMMENDATIONS FOR APPROPRIATE NYS BENCHMARKS

NYSUT offers five recommendations to support the design of appropriate New York State benchmarks.

1. DEFINE WHAT WE WANT TO MEASURE

Absent in New York state's process to establish benchmarks to determine college and career readiness are necessary definitions of key terms in this policy conversation. How does New York state define:

College?

The requisite knowledge for success in college differs based on the demands of specific programs. However, a postsecondary training program, proprietary school, trade school, two-year college, four-year college and postgraduate school are all considered the same for our assessment of college and career readiness. Postsecondary education life and what that means for all students needs to be considered.

Career?

The requisite knowledge for success is different based upon specific career paths. Upon exit from secondary school, a student may seek blue collar or white collar employment, full-time or part-time employment, military service or self-employment, yet all paths are considered the same for our assessment of college and career readiness. The current pathways are not sufficient and need to be broadened. Soft-skills employers seek, as well as social-emotional competencies and work ethic, need to be addressed.

Readiness?

Readiness is a measurement term offered by the College Board. NAEP measures preparedness, not readiness. Traditionally, New York state grades 3–8 tests measure proficiency. Readiness, preparedness and proficiency are not synonyms. Readiness is different for all students and dependent upon their chosen path. Readiness should be about possessing the necessary skills to be successful, the tools to mature and grow, and being a civically responsible member of a democratic society.

New York state has not been precise in what it seeks to measure. However, that has not prevented the establishment of narrowly defined, high-stakes assessments of college and career readiness on a faulty foundation.

See Appendix 3 for a listing of various definitions of college and career readiness.

How Do Other States Define College and Career Readiness?

States are implementing a variety of initiatives and policies to assess and support student college and career readiness. The College and Career Readiness and Success (CCRS) Center is based at the American Institutes for Research and funded through a grant by the Office of Elementary and Secondary Education at the U.S. Department of Education. In October 2015, The CCRS Center updated its interactive state map to provide a snapshot of state college and career readiness policies, metrics and initiatives across all states. New York, along with 12 other states, is listed as "has not adopted or made available a definition of college and career readiness." Thirty-eight other states and the District of Columbia have a wide range of definitions of college and career readiness, from successfully completing credit-bearing, first-year courses at a postsecondary institution and the skills to embark on a chosen career, to definitions that include detailed policies that describe college and career readiness that is detailed, nuanced and useful.

Kentucky

Students in Kentucky can graduate "college ready," "career ready" or "college and career ready."

Kentucky defines college readiness as the "level of preparation a student needs to succeed in creditbearing courses in college." Career readiness is defined as the "level of preparation a high school graduate needs to proceed to the next step in a chosen career, whether that is postsecondary coursework, industry certification or entry into the workforce."

College readiness is determined by meeting benchmarks in one of three categories. Students take the ACT their junior year. ACT scores of 18 for English and 20 for reading determine college readiness. Kentucky employs a three-tiered approach to mathematics college readiness. Depending on the student's chosen field of study, an ACT math score of:

- 19 determines college readiness for introductory courses in math, such as statistics or an applied math course;
- 22 determines college readiness for college algebra; and
- 27 determines college readiness for calculus.

All Kentucky public colleges and universities accept these ACT scores.

If students do not meet the ACT college readiness requirements, they can take the Kentucky Community College and Technical College System (KCTCS), ACT COMPASS or Kentucky Online Testing (KYOTE) college entrance exams.

A career-ready student must meet academic and technical benchmarks. The academic benchmarks are either a 55 or higher on the Armed Services Vocational Aptitude Battery (ASVAB) or a score of 4 or higher on the WorkKeys exam. The technical benchmarks are a passing score on the Kentucky Occupational Skills Standards Assessment (KOSSA) or receive an industry certificate.

A college-and career-ready student must meet one college-ready academic benchmark (ACT, or ACT COMPASS, or KYOTE) and one career-ready technical benchmark (KOSSA or industry certificate).

California

California's Career Readiness Initiative 2015 has 21 key objectives to support, sustain and strengthen Career and Technical Education (CTE) in the state. This includes promotion of California Department of Education's (CDE) Standards for Career Ready Practice. The standards describe the fundamental knowledge and skills all California students need to prepare for transition to postsecondary education, career training, and the workforce. The CDE is providing resources that will promote career readiness and 21st century skills for all California students.

In 2014, California adopted Standards for Career Ready Practice for all students. California adapted the Career Ready Practices from the Common Career Technical Core.

Standards for Career Ready Practice include:

- Apply appropriate technical skills and academic knowledge.
- Communicate clearly, effectively and with reason.
- Develop an education and career plan aligned with personal goals.
- Apply technology to enhance productivity.
- Utilize critical thinking to make sense of problems and persevere in solving them.
- Practice personal health and understand financial literacy.
- Act as a responsible citizen in the workplace and the community.

- Model integrity, ethical leadership and effective management.
- Work productively in teams while integrating cultural and global competence.
- Demonstrate creativity and innovation.
- Employ valid and reliable research strategies.
- Understand the environmental, social and economic impacts of decisions.

Massachusetts

The Massachusetts definition of college and career readiness is broader than just ELA and mathematics competence and is based on a student's chosen pathway.

Massachusetts has defined a set of learning competencies in ELA and math, competencies for workplace readiness and a focus on applying academic strategies to problem-solving in diverse professional and life contexts, appropriate to individual student goals.

Essential Competencies - ELA/literacy and mathematics:

- ELA/literacy demonstrate the academic knowledge, skills and practices necessary to enter into and succeed in:
 - Entry-level, credit-bearing courses in college English composition, literature or technical courses;
 - Certificate or workplace training programs requiring college-level reading and writing; or
 - A comparable entry-level reading and writing course at the institution.
- Mathematics demonstrate the academic knowledge, skills and practices necessary to enter into and succeed in:
 - Entry-level, credit bearing courses in college algebra, introductory college statistics, or technical courses;
 - Certificate or workplace training programs requiring an equivalent level of mathematics; or
 - A comparable entry-level math course at the institution.

Workplace Readiness:

The emphasis should be on career awareness, exploration and immersion as well as development of the foundational knowledge and skills necessary to successfully navigate the workplace. College- and career-ready students will demonstrate:

- Work ethic and professionalism
- Effective communication and interpersonal skills
- Qualities and strategies

Preparation for college and career should help students develop a wide range of quantitative and qualitative abilities that go beyond the minimum level of competence needed for entry-level college courses and employment. In high school, students should demonstrate:

- Higher order thinking skills of analysis, synthesis and evaluation
- The ability to think critically, coherently and creatively
- The ability to direct and evaluate their own learning, be aware of resources available to support their learning, and have the confidence to access these resources when needed
- Motivation, intellectual curiosity, flexibility, discipline, self-advocacy, responsibility and reasoned beliefs

"Together these attributes provide the framework for college and career readiness and support educational and work place success as well as serve as the basis for being an active participant in our democracy."

What are College and Career Predictors?

A 2013 research brief by the College and Career Readiness and Success Center at American Institutes for Research, Predictors of Postsecondary Success summarized available research that identified student skills, behaviors and other characteristics that predict college and career success. They reported limited research linking secondary characteristics to postsecondary readiness. None of the studies reviewed tracked students beyond the second year of postsecondary schooling. The research was based on correlational studies, not causal studies. The limited research available focused on course taking, test scores and early postsecondary outcomes. Additionally, it noted the need for additional research and the evaluation of identified measures due to the recentness of this topic (AIR, 2013).

The center found little or no research focused specifically on special populations such as English language learners (ELLs) and students with disabilities. No studies were found that identified early childhood (prenatal through kindergarten) indicators of postsecondary success.

No studies were found that identified elementary (grades 1-4) predictors of postsecondary success. Researchers did identify two indicators that were predictors of future academic success; reading by the third grade and less than 10 percent absenteeism in elementary school. Also identified were certain social skills and behavior predictors, such as the ability to develop and maintain relationships with others.

At the middle level (grades 5–8), there were numerous indicators of secondary-level success, including less than 20 percent absenteeism, remaining in the same school through the middle grades, no behavior problems, passing all ELA and math courses and meeting benchmarks on state exams, and course-taking pathways and rigorous coursework. Also identified were other potential factors, such as critical thinking and social-emotional and decision making-skills.

Numerous indicators and predictors were found at the high school level (grades 9–12), including attendance, GPA and test scores, specific course-taking pathways and participation in college preparatory programs. Other potential factors leading to postsecondary readiness include students who possess five core Social Emotional Learning (SEL) skills (self-awareness, self-management, social awareness, relationship skills and responsible decision-making).

Additional research suggests that predictors of college and career readiness are much more than standardized tests. David Conley and his colleagues at the Educational Policy Improvement Center (EPIC) have found that cognitive strategies important for success in college cannot be accurately assessed through existing standardized tests (Conley, 2007). He notes that college and career readiness needs to be measured in a variety of ways with "appropriately complex measures" (Conley, 2012).

The reality is that a range of postsecondary opportunities exists for students. "College" and "career" are general terms that do not recognize the continuum of possible outcomes. While the narrowness of a single measure creates an easily obtained data source, it is patently unfair to students, educators and communities, particularly when this rigid assessment of standards leads to a message of failure. New York state must reject a single measure and adopt more broadly based measurement tools to better assess post-secondary preparedness.

New York state must move beyond defining college and career readiness in terms of performance on standardized tests and a score of 75 or above on the English Regents and 80 or above on the Algebra Regents. College and career readiness needs to reflect the diverse needs of all students. As other states have done, New York State needs to define college and career readiness with consideration of individual students and the path they choose to pursue.

2. TRANSFORM THE COMMON CORE STANDARDS TO NYS STANDARDS

The current New York state Common Core Learning Standards for ELA/Literacy and Mathematics were adopted by the Board of Regents in January 2011. Districts were expected to implement the new standards immediately with testing to begin in the spring of 2013, two full years before most other states would test students on the Common Core. The first year's results were devastating, with proficiency in ELA and math hovering at 30 percent, a figure then-Education Commissioner John King had predicted at a press conference months before the tests were administered and scored.

Development of the Common Core State Standards bypassed classroom practitioners, thus leaving the knowledge of how students learn and developmental appropriateness largely out of the equation. New York state's implementation of the standards was widely criticized for serious shortcomings that included: an inappropriate rush to implement, lack of resources to districts, lack of preparation time and professional development for educators, and inadequate information and involvement of parents. Other states had mapped out a multi-year rollout that included professional development for educators delivered by educators, and time for districts to implement the standards and work to ensure teachers in those states had the resources necessary for instruction. New York state, on the other hand, rushed to pass a teacher/principal evaluation plan that inappropriately relied on students' test results as a component of teacher and principal effectiveness. When the first New York State Common Core Learning Standards-aligned tests were administered in 2013, only two of 64 math modules for grades Pre-K-8, and 15 of 113 Pre-K-8 ELA modules/domains were completed. The math and ELA modules and domains were not completed until the 2013-14 school year. Neither the state's Common Core Learning Standards nor the aligned modules and domains included differentiation for students with disabilities, English language learners or gifted and talented students. To complete the debacle, SED did not heed years of research nor the call of early childhood experts to suspend CCLS for kindergarten through grade 3.

What is needed now is a revision of New York State Learning Standards for ELA/Literacy and Mathematics.

- The first and most important part of any revision new standards must be written by New York state practitioners. They have the knowledge and pedagogy to write developmentally and grade-appropriate standards and to include strategies for students with disabilities, English language learners, and gifted and talented students. Practitioners who have used the state's CCLS should be significantly involved in re-examining the developmental appropriateness, especially at the early childhood and upper elementary levels.
- The standards should allow for strategies of differentiation to meet the needs of students with disabilities, English language learners, and gifted and talented students. They should include a section for appropriate instructional supports such as student services, individualized instruction and assistive technology. Strategies should also be incorporated to address the cognitive, linguistic, social and emotional needs of students.
- Standards should be introduced in kindergarten and progress through the grades so all students have a solid foundation. This would eliminate gaps in instruction that could affect the acquired knowledge of students.
- These new English Language Arts and Mathematics Standards should be taught in tandem with other New York state learning standards.
- SED should continue to offer multilingual and bilingual students the State Seal of Biliteracy when they are proficient in listening, speaking, reading and writing in English and another language. The State Seal of Biliteracy is one way New York state students demonstrate their Global Competence.
 - The National Education Association calls global competence a 21st century imperative. "Our students have the opportunity and challenge of living and working in a diverse and rapidly changing world. Public schools must prepare our young

people to understand and address global issues, and educators must re-examine their teaching strategies and curriculum so that all students can thrive in this global and interdependent society."

— former NEA President Dennis Van Roekel These competencies include:

- International Awareness
- Appreciation of Cultural Diversity
- Proficiency in Foreign Languages
- Competitive Skills, such as extensive knowledge of international issues, high-level thinking skills that enhance creativity and innovation, and a thorough understanding of the economic, social and technological changes taking place across the globe.
- Research-based, sound and appropriate professional development needs to accompany any revision and rollout of new standards. Teachers need the resources and tools to effectively transform instruction to align with new standards. Districts need to work with and support practitioners through professional development and resources.
- SED should develop a guidance document for implementation that includes awareness, transition and school readiness. A pipeline for communicating with parents and communities should be included in any implementation plan. Parents should be involved in reviewing any standards and provide feedback as they work with their children and teachers.
- SED should implement the Career Development and Occupational Studies (CDOS) standards. These skills should be incorporated into the content of other standards areas. Instruction in these standards would prepare students for college and careers in their post-secondary life. The issue of how to measure acquisition of these skills could be done through project-based learning.

The CDOS standards include:

- Career Development
 - Students will be knowledgeable about the world of work, explore career options, and relate personal skills, aptitudes and abilities to future career decisions;
- Integrated Learning
 - Students will demonstrate how academic knowledge and skills are applied in the workplace and other settings;
- Universal Foundation Skills
 - Students will demonstrate mastery of the foundation skills and competencies essential for success in the workplace; and
- Career Majors
 - Students who choose a career major will acquire the career-specific technical knowledge/skills necessary to progress toward gainful employment, career advancement and success in postsecondary

3. **REVISIT NYS GRADUATION POLICY**

New York state graduation policy is focused primarily on a Regents diploma with limited opportunities to obtain a local diploma as an alternative. Those are the only diploma options for students. Too many students who are unable to meet the graduation requirements on a traditional timeline may exit secondary education without any credential at all. State graduation policy needs to be revisited and recognize college- and career-readiness realities.

Multiple Pathways to a New York State Diploma

Middle-skill jobs that require education beyond high school but not a four-year degree make up the largest part of America's and New York's labor market. Education policies should ensure that highquality training are infused with education that result in market-ready skills and attaining postsecondary credentials for New York students.

The reauthorized Workforce Innovation and Opportunity Act (WIOA) contains a first-ever federal definition of career pathway that applies to all programs and titles in the act. The law defines a career pathway as a "combination of rigorous and high-quality education, training and other service" that, among other requirements, aligns with the skills needs of the state or regional economy; helps an individual enter into or advance within a specific occupation or occupational cluster; and enables an individual to obtain both a secondary diploma and at least one recognized postsecondary credential.

Multiple Pathways to Graduation, approved by the Board of Regents in January 2015, was a long overdue step in the right direction. The new regulations allow students to earn a Regents diploma by replacing one of the history or (eventually) science exams with a comparably rigorous technical, arts or other SED-approved assessment for the fifth examination. Students will still be required to take and pass four years of social studies, including two years of global history, one year of U.S. history and a semester each of participation in government and economics. While not all the options are yet available, 13 Career and Technical Education (CTE) exams have been identified as comparably rigorous to a Regents exam. To increase the number of assessments on this approved list, the Board of Regents has directed SED to convene an expert panel to evaluate other CTE assessments that could be used as alternatives, including alternatives for the required Regents science exam.

Including CTE assessments as an alternative to a Regents exam signifies that New York state values CTE as highly as traditional academic subjects in preparing students to be career and college ready. The adoption of the 4+1 option gives students greater flexibility in high school graduation requirements and opens the door for additional CTE exams to be approved.

For example, it is reported that more than 90 percent of Capital Region BOCES CTE students pursue college or technical school degrees post-CTE graduation.

NYSUT strongly supported the Regents plan to create a number of new pathways to graduation for students in CTE, Science, Technology, Engineering and Math (STEM); humanities and the arts. The approved pathways go a long way in addressing the diverse needs, talents and interests of our students but they must go even further.

Special Student Populations

The impact of the Regents' College and Career Readiness agenda on special populations of students such as English language learners (ELLs) and students with disabilities (SWDs) needs to be addressed in a more comprehensive, systemic and responsible fashion. A clearly coordinated set of proposals to move the agenda forward for this population of students is necessary. It is essential to establish a range of comparable alternatives that would provide these students with an equitable opportunity to obtain a diploma.

The availability of testing accommodations for special populations is one area to be considered. For example, while only certain testing accommodations are allowed for ELLs, research indicates that the single most effective testing accommodation is not currently allowed by New York state. It allows for re-wording of test items to clarify the meaning of information presented as well as to clarify the meaning of the questions asked. This finding is shared in a recent comprehensive study by the U.S. Department of Education, Language Instruction Educational Programs (LIEPs): Review of the Foundational Literature.

"The reviewed literature suggests that ELLs' scores on academic content assessments may not always be representative of these students' actual content skills and knowledge. Research on accommodations for ELLs suggests that, at best, many commonly used accommodations may be minimally effective for ELLs. At worst, research suggests that these accommodations are inappropriate for ELLs and may even hinder their performance (Rivera and Stansfield 2001; Rivera and Collum 2004; Willner, Rivera and Acosta 2008; Willner, Rivera, and Acosta 2009). Further, while English language proficiency assessments (ELPAs) are improving in terms of their capacity to measure the academic language used in content classrooms, early studies found that these assessments did not always measure the kind of language necessary to fully engage with the content assessments, let alone provide adequate responses (Abedi 2004; Abedi 2001; Butler and Castellon-Wellington 2000; Stevens, Butler, and Castellon-Wellington 2000). In states where this is true, this could mean that even former ELLs may continue to face barriers to showing their knowledge on academic content assessments in English. Based on these uncertainties, practitioners and policy makers should interpret ELLs' content assessment scores with care (Ragan and Lesaux 2006; Linquanti 2001; Stevens, Butler, and Castellon-Wellington 2000)."

The availability of a safety net for ELLs and SWDs should also be addressed in a more comprehensive manner. While a safety net is currently in place for ELLs and SWDs to obtain a local diploma, a wider safety net must be considered as part of a comprehensive policy discussion that considers the unique needs of these students.

In addition, it is time to incorporate multiple ways of demonstrating proficiency in subject area content. Performance-based assessments or other opportunities to demonstrate proficiency in the same state standards that are assessed through Regents exams must be explored. The identification and availability of additional assessment options in this way would not only benefit special populations of students but all students and allow them to demonstrate attainment of learning standards at the commencement level.

4. OBTAIN INPUT FROM PROVIDERS OF POSTSECONDARY OPPORTUNITIES

It is imperative that changes made in pre-K-12 college- and career-readiness benchmarking not be done in isolation. Input on skills, knowledge and qualities of future employees and/or students should be gathered, considered and incorporated into any new standards and requirements.

In 2010, a higher education panel consisting of representatives from all four sectors of higher education (SUNY, CUNY, Independent Colleges, and Proprietary Colleges) discussed College Readiness Challenges in New York state. The panel provided input to the Board of Regents and answered questions relating to New York state's high school graduates and how well they are prepared for college. The panel agreed that too many New York state students are lacking critical thinking, written expression and problem-solving skills. Students need more work in these non-academic areas and in time management and study skills. The panel discussed how college remedial courses are unsuccessful if a student is not college ready and that 75 percent of students entering the CUNY Community College system needed remediation. While the panel provided recommendations on necessary elements in college preparedness such as critical thinking, written expression, problem-solving skills, time management and study skills, these additional elements were never addressed by the Board of Regents in a substantive way. Such input must be respected and incorporated.

It is clear students may need remediation in higher education for many reasons. However, the need for remediation does not, in and of itself, reflect readiness for college. Prior educational performance is one measure but it is not the only indicator. A number of conclusions are drawn from factors that are independent and unrelated. For example, a student who does not finish college may be an outcome based on other issues, such as financial constraints, a life change or a change in personal goals. It is misleading to use such a metric in determining college readiness.

This discussion must address the range of college opportunities as well as the range of career opportunities. The requisite competencies necessary to pursue these varied paths should be identified based on input from the providers of these postsecondary opportunities. A New York state diploma should then appropriately reflect the attainment of the knowledge and skills needed for the respective path.

5. USE APPROPRIATE DATA INSTEAD OF AVAILABLE DATA

Education officials in New York state say they want to measure "college and career readiness" but have yet to develop a comprehensive plan to do so. Currently the measure of college and career readiness rests in the results of the state's grades 3–8 standardized testing and the Regents exams. Instead of using evidence and measures based on project-based learning, an ability to work with people and creative thinking, the state relies on assessments that require reading and endurance.

The exams do not necessarily measure the skills students need to be successful in life, but instead provide a number which can be compared to other numbers to unreliably identify some students as college and career ready while other are not.

Various stakeholder groups have in the past recommended moving away from a single measure of assessment and allow for development over time. SED has not listened to these voices. A March 2014 report for the NYS BOCES District Superintendents prepared by the Staff/Curriculum Development Network of New York State (S/CDN), which is, in effect, the instructional leadership arm of the 37 BOCES in New York state, indicated that the focus of Data Driven Instruction (DDI) should pivot to instruction. Resources and attention should be directed to DDI rather than to accountability data and the data portal.

As far back as 2008, the NYSUT High School Initiatives Task Force recommended that using data to inform instruction leads to clearer goals and improved achievement when instruction is targeted. The assessments in their current state do not allow for that. The release of data related to the assessments does not inform instruction and, therefore, does not allow for adjusting instruction to increase student achievement. Yet the results of these tests are used to determine college and career readiness because, unlike portfolios and other methods of evaluation, they allow for one comparable number across students throughout the state.

If these assessments based on the Common Core Learning Standards are true measures of what students should know and be able to do, the assessments themselves should be used to determine cut points as they increase in difficulty. They should be used to develop independent benchmarks rather than using outside, unrelated assessments to determine the benchmarks for proficiency.

The failures of Common Core implementation — lack of parent and teacher input, lack of resources, rushed roll-out, top-down decision making and one-size-fits all edicts — must be reversed. Educators, who are charged with protecting our students' wellbeing and their futures, stand against the state's unsupported benchmarking process that wrongly labels students and short circuits their dreams. NYSUT calls for high New York state standards of college, career and civic readiness based on input from parents, educators, employers and higher education faculty. Our students deserve no less.

APPENDIX 1

Date	SED/Board of Regents Action CCR
January 2002	Last administration of Sequential Math I Regents exam
June 2002	First administration of Math A Regents exam
2005-2006	• Transition year when the current grade 3-8 assessment system replaced one based on testing only in grades 4 and 8. Exams based on 2005 NY State Learning standards.
September 2008	• The passing rate is raised from 55 to 65 on Regents exams for those entering high school in 2008.
January 2009	• Grades 3-8 ELA exams (2005 standards) (CTB/McGraw Hill)
	• Last administration of Math A Regents exam (1996 standards).
March 2009	• Grades 3–8 Mathematics exams (2005 standards) (CTB/McGraw Hill)
June 2009	• First administration of Algebra I Regents exam based on 2005 Math Standards
November 2009	• Board of Regents (BOR) workgroup charged with developing recommendations for possible changes to the NY State high school diploma requirements and Regents exams to better align them with college and career readiness as well as a review of the GED policy and program.
April 2010	 Changes were made to the grades 3-8 ELA assessments format to make them longer and more rigorous. April 26-28, Grades 3-8 ELA exams (CTB/McGraw Hill) moved from January – April. CCR Workgroup was presented with updated information on P-12, Higher Education and national data, including: An analysis of Regents exam performance for the 2001-2005 cohorts and projections for the 2005-2008 cohorts Information on Trends in Demographics, College Enrollment and Remediation and Research from the New York Comprehensive Center on high school examination systems in other states and countries.
May 2010	 Changes were made to the grades 3-8 math assessments format to make them longer and more rigorous. May 5-7, Grades 3-8 Mathematics exams (CTB/McGraw Hill) moved from March to May.
June 2010	• First Administration of Geometry Regents exam based on 2005 Math Standards.
July 2010	 After the administration of the 2010 ELA and math exams, the department reset cut scores to signal student progress toward college and career readiness. The exams were written by CTB/McGraw Hill.
	 SED presents research (based on Math A/B Regents) and previous English Regents to the BOR showing the relationship between Regents exam scores and students' college readiness. (CUNY study to NYSED on Relationship of Regents ELA and Math Scores to College Readiness Indicators.)
	• Based on this research, the Department redefines "proficiency" on its grades 3–8 math and English assessments to mean that a student is on track to score an 80 or better on the math Regents exam and a 75 or better on the English Regents exam.
	 BOR adopts the Common Core State Standards (CCSS) for English Language Arts and Literacy in History/Social Studies, Science, and Technical Subjects and the CCSS for Mathematics with the understanding that additional K-12 expectations and prekindergarten standards may be added.
August 2010	• New York state awarded \$696.6 million in federal Race to the Top competition

September 2010	Dapal Discussion at BOR meeting: College and Career Readiness. The panel presents
1	overviews of programs and answers questions relating to New York state's high school
	graduates and how well they are prepared for college and the workforce. Discussion
	focuses on CTE programs and how important it is to integrate core courses into the CTE
	program so that students see the relevance to the work they are doing.
	• The BOR identified a strong foundation in math and English skills as an important aspect of college and career readiness.
	• The P-12 Committee asks SED to develop a transition plan to support the publishing of
	college and career ready graduation rates.
October 2010	• The Department presented its timeline for the release of graduation rate information,
	including releasing college and career readiness graduation rate calculations for the 2007
	cohort using the new USDOE cohort definition.
	• SED will publish college- and career-ready graduation rate calculations that show what
	math Regents exam and 75 or better on their English Regents exam. To facilitate
	comparisons, the college- and career-ready graduation rate data will be published alongside
	actual graduation rate data.
January 2011	• The Board of Regents approves the New York State P-12 Common Core Learning
	Standards for English Language Arts (ELA) and Literacy; the New York State P-12
	Common Core Learning Standards for Mathematics; and the New York State Prekindergarten Learning Standards
	 I ast administration of Math B Recents Evam (1996 standards)
	 East administration of the redesigned English Regents to be administered in one, three
	hour session instead of two, three-hour sessions.
February 2011	• Contract with Pearson, Inc. is finalized for the development of state assessments in grades
	3–11 English and grades 3–8 Mathematics. The initial contract period is from Jan. 1, 2011
	- Dec. 31, 2015 for \$32,136,276.00. The 5-year contract includes development of test
	questions, conducting field testing, scoring field tests, developing all operational test forms,
May 2011	May 2.6 orados 2-9 ELA overse (Deerson)
2	 May 1-0, grades 3 = 8 mathematics exams (Pearson)
June 2011	First Administration of Alashar H and Trie Decents areas hand an 2005 Math Standards
July 1, 2011	First Administration of Algebra II and Trig Regents exam based on 2005 Math Standards
September 2011	• New Annual Protessional Performance Review (APPR) regulations take effect.
September 2011	• SED advises that teachers should be implementing one Common Core unit every semester.
December 2011	• SED announces its commitment to embed multiple-choice questions for field testing
	within the Spring 2012 grades 3-8 English language arts (ELA) and mathematics tests.
March 2012	• BOR presentation on the Findings and Recommendations of the Independent Review of
	the Department's Test Integrity Policies and Procedures
April 2012	• April 17-19, grades 3-8 ELA exams (Pearson)
	• April 25-27, grades 3-8 mathematics exams (Pearson)
	• Grades 3-8 tests were longer than those given in previous years, because they also contain
	many field-test questions.
	 Eighth-grade ELA tests contain reading passages about talking pineapples and misleading questions.
August 2012	SED Guidance: Grades 3-8 Mathematics Testing Program Guidance
	September-to-April / May-to-June Common Core Learning Standards
October 2012	• SED testing guides for grades 3–8 ELA and math CC Assessments promised
November 2012	• CED release Deviced Tests for the 2012 and 1, 2, 0 M (1, 1, 1) Test
	• SED releases Kevised 1001s for the 2013 grades 3–8 Mathematics Tests

January 2013	• SED issues memo with information regarding required field testing "All schools that administer state operational tests are also required to administer the field tests associated with them."
March 6, 2013	• SED releases an important field memo on the implementation of the CCLS and the transition to CC assessments.
March 18, 2013	• SED updates the test guides for ELA and mathematics.
April 16, 2013	• At a <i>Times Union</i> editorial board meeting, Commissioner John King says the number of students considered proficient will likely drop by 30 points
April 2013	• April 16-18 First administration of grades 3-8 ELA CC aligned assessments (Pearson, Inc.)
	• April 24-26 First administration of grades 3–8 math CC aligned assessments
July 15-19, 2013	• Range finding for the grades 3-8 CC ELA and math assessments
July 29-Aug. 2, 2013	• Item review for the grades 3-8 CC ELA and math assessments
August 7, 2013	• SED releases 2012–13 grades 3–8 English Language Arts (ELA) and math test scores.
	• SED releases 25 percent of the test questions used on the 2013 grades 3-8 assessments
September 2013	• Regents adopt amendment to provide flexibility to school districts for one year in the requirement for providing Academic Intervention Services (AIS)
April 2014	• April 1-3, grades 3–8 ELA CC assessments
May 2014	• April 30 – May 2, grades 3–8 math CC assessments - Day 2 grade 3 math, Form D books with missing pages
	• BOR approves expansion of Integrated Credits in approved CTE Programs to 8 applied to respective core areas as determined at the local level.
April and May 2014	• Approximately 60,000 parents opt-out their students from state assessments
August 2014	• SED releases approximately 50 percent of the questions used on the 2014 grades 3-8 assessments
January 2015	Board of Regents approves Multiple Pathways to Graduation
April 2015	• April 14-16, grades 3–8 ELA exams (Pearson)
	• April 22-24, grades 3–8 mathematic exams (Pearson)
	Approximately 200,000 parents opt-out their students from state assessments
April 2016	• April 5-7 grades 3–8 ELA exams (Pearson/Questar, Inc. transition)
	April 13-15 grades 3-8 math exams (Pearson/Questar, Inc. transition)
June 2016	First administration of Algebra II CC Regents exam
	English CC Regents exam

APPENDIX 2

NY's changing standards: Three major overhauls in a student's K-12 career

Standards taught and assessments administered for a student who entered kindergarten in 2004-05 and graduates in 2017

	1996 Standards					2005 Standards					Common Core Standards				
School Year	2004-05	2005-06	2006-07	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14	2014-2015	2015-16	2016-17		
Grade level	Kindergarten	Grade 1	Grade 2	Grade 3	Grade 4	Grade 5	Grade 6	Grade 7	Grade 8	Grade 9	Grade 10	Grade 11	Grade 12		
ELA and Mathematics standards for instruction	1996	2005 grades 3-8 1996 HS	2005 grades 3-8 1996 HS	2005 grades 3-8 1996 HS	2005 grades 3-8 Transition year for high school	2005 grades 3-8 and HS	2005 grades 3-8 and HS	2005/CC Transition year Grades 3-8 2005 HS	Common Core grades 3-8 2005/CC HS transition year for Math, ELA	Common Core Grades 3-8 HS transition year for English, Math	Common Core Grades 3-8 and HS	Common Core Grades 3-8 and HS	Common Core Grades 3-8 and HS		
ELA and Mathematics State Testing requirements 2004-2017	Grades 4 and 8 based on 1996 standards Math A/B (1996) English Regents (1996)	Grades 3-8 (2005) CTB/McGraw-Hill Math A/B (1996) English Regents 2 day, 6 hour (1996)	Grades 3-8 (2005) CTB/McGraw-Hill Math A/B (1996) English Regents 2 day, 6 hour (1996)	Grades 3-8 (2005) CTB/McGraw-Hill Math A/B (1996) English Regents 2 day, 6 hour (1996) Regents 2 day, 6 hour	Grades 3-8 (2005) CTB/McGraw-Hill Math A/B (1996) transition year Algebra I Regents (2005) English Regents 2 day, 6 hour (1996)	Grades 3-8 (2005) CTB/McGraw-Hill reset cut scores Algebra I Regents (2005) Geometry (2005) Math B (1996) English Regents 2 day, 6 hour (1996)	Grades 3-8 Pearson Algebra I (2005) Geometry (2005) Algebra II/Trig (2005) Redesigned English Regents (2005) 1 day, 3 hr.	Grades 3-8 Pearson-Embed multiple-choice questions for field testing Algebra I (2005) Geometry (2005) Algebra II/Trig (2005) English Regents (2005)	Grades 3-8 CC Reset cut scores Pearson- Embedded field test questions. 25% questions released. Algebra I (2005) Geometry (2005) Algebra II/Trig	Grades 3-8 Pearson- Embedded field test questions. 50% questions released. Algebra I CC Geometry (2005) Algebra II/Trig (2005) English Regents	Grades 3-8 Pearson- Embedded field test questions. 50% questions released. Algebra I CC Geometry CC Algebra II/Trig (2005) ELA Regents	Grades 3-8 Pearson/Questar transition Algebra I CC Geometry CC Algebra II/Trig CC ELA CC Regents	Grades 3-8 Questar, Inc. Algebra I CC Geometry CC Algebra II/Trig CC ELA CC Regents		
I.	1996 Stan	dards		(1996)			Standards	05 s Change	(2005) English Regents (2005)	(2005) ELA CC Regents	(2005) ELA CC Regents		2010 Change to CC Standards		

And a changing roster of test-makers:					CTB/McGra	w Hill			Pea	rson			Questar
School Year	2004-05	2005-06	2006-07	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14	2014-2015	2015-16	2016-17
Testing	ELA - Grade 4,	ELA	ELA	ELA	ELA	ELA	ELA	ELA	ELA	ELA	ELA	ELA	TBA
administration	Jan 31- Feb 4	January 9-20	January 8-19	January 7-18	January 12-23	April 26-28	May 3-6	April 17-19	April 16-18	April 1-3	April 14-16	April 5-7	
Grades 3-8	Grade 8, 10-14	Math	Math	Math	Math	Math	Math	Math	Math	Math	Math	Math	
(grades 4	Math – Grade 4,	March 6-17	March 5-16	March 3-12	March 2-13	May 5-7	May 11-13	April 25- 27	April 24-26	April 30 – May 2	April 22-24	April 13-15	
and 8 only	May 10-12					Reset cut scores							
2004-2005)	Grade 8,					to show CC							
	May 10-11					readiness.						/	

Definitions of College and Career Readiness (CCR)

"Traditional indicators of core academic skills, such as high school grade point average, class rank, scores on the ACT college readiness assessment and the SAT, and the rigor of coursework, have typically been used to define CCR, even though the various definitions of CCR employ unique sets of indicators (ACT, 2004; Berkner & Chavez, 1997; Greene & Winters, 2005; Wiley, Wyatt, & Camara, 2010).

"Differences among the various definitions of CCR often lead to different conclusions about whether a student is ready for college and a career as well as vastly different implications about the readiness of US student more generally"

[Source: ACT Research Report Series 2014 (5), Broadening the Definitions of College and Career Readiness: A Holistic Approach by Krista Mattern, Jeremy Burrus, Wayne Camara, Ryan O'Connor, Mary Ann Hanson, James Gambrell, Alex Casillas, Becky Bobek]

ACT

ACT has long defined college and career readiness as the acquisition of the knowledge and skills a student needs to enroll and succeed in credit-bearing, first-year courses at a postsecondary institution (such as a two- or four-year college, trade school or technical school) without the need for remediation. **[Source:** The Condition of College and Career Readiness 2011,

www.act.org/research/policymakers/cccr11/pdf/ConditionofCollegeandCareerReadiness 2011.pdf]

NYC Department of Education (DOE)

The DOE's **College and Career Readiness Benchmarks** define the qualities and achievements students need to complete in order to be ready to enroll, persist and succeed in college, postsecondary training opportunities, and gain entry into meaningful careers. [Source: NYC Department of Education

http://schools.nyc.gov/Academics/CommonCoreLibrary/About/CCR/default.htm]

Career and Technical Education Technical Assistance Center (CTE TAC) of New York College and Career Ready 2012:

To be college and career ready, all students in New York state should have preparation in the three major skill areas of core academic skills, employability skills and technical skills, which will allow them to transition seamlessly into career and/or a postsecondary credentialing program (e.g. industry training, apprenticeship, licensure, community or four-year college).

- Core Academic skills: The ability to apply those skills to concrete situations in order to function in the workplace and in routine daily activities.
- Employability Skills: The soft skills (such as critical thinking and responsibility) that are essential in any career area.
- Technical, job-specific skills: These skills have been emphasized across numerous pieces of research and allow students to enter true career pathways that offer family sustaining wages and opportunities for advancement.

[Sources: New York State High School Graduates. What does it mean to be College and Career Ready? CTE April 2012

www.nyctecenter.org/spn/media/files/articles/files/10151/College%20and%20Career%20Ready%20W P%20April%202.pdf] and Association for Career and Technical Education (ACTE), What is "Career Ready"?]

Achieve

"College and career readiness refers to the content knowledge and skills high school graduates must possess in English and mathematics — including, but not limited to, reading, writing communications, teamwork, critical thinking and problem-solving — to be successful in any and all future endeavors. Of course, readiness for college and careers depends on more than English and mathematics knowledge; to be successful after high school, all graduates must possess the knowledge, habits and skills that can only come from a rigorous, rich and well-rounded high school curriculum."

What is "college" ready?

College today means much more than just pursuing a four-year degree at a university. Being "college ready" means being prepared for any postsecondary education or training experience, including study at two- and four-year institutions leading to a postsecondary credential (i.e. a certificate, license, associate, or bachelor's degree). Being *ready* for college means a high school graduate has the English and mathematics knowledge and skills necessary to qualify for and succeed in entry-level, credit-bearing college courses without the need for remedial coursework.

What is "career" ready?

In today's economy, a "career" is not just a job. A career provides a family-sustaining wage and pathways to advancement, and requires postsecondary training or education.

A job may be obtained with only a high school diploma but offers no guarantee of advancement or mobility. Being ready for a career means a high school graduate has the English and mathematics knowledge and skills needed to qualify for and succeed in the postsecondary job training.

[Source: Excerpt Citation: Achieve. (n.d.). *What is college- and career-ready?* Washington, DC: Author. Retrieved January 3, 2012, from www.achieve.org/files/CollegeandCareerReady.pdf.]

American Youth Policy Forum (AYPF)

AYPF takes a broad view of the concept of college and career readiness, expanding it to include the concept of success, not just readiness. By this definition, readiness means being prepared to successfully complete credit-bearing college coursework or industry certification without remediation, having the academic skills and self-motivation necessary to persist and progress in postsecondary education, and having identified career goals and necessary steps to achieve them. Readiness also requires the developmental maturity to thrive in the increasingly independent worlds of postsecondary education and careers, the cultural knowledge to understand the expectations of the college environment and labor market, and the employer-desired skills to succeed in an innovation-based economy. In order for students to be successful in this broader framework of expectations, they need rigorous academic preparation, college and career planning, academic and social supports, employer-desired skills and personal resources.

It is also important, in the discussion of college and career readiness, to recognize that youth will choose their own paths in life, with some young people charging forward on a traditional four-year college pathway and others moving equally quickly to pathways that are more technically or occupationally oriented.

[Source: Excerpt Citation: Hooker, S., & Brand, B. (2009). Success at every step: How 23 programs support youth on the path to college and beyond. Washington, D.C.: American Youth Policy Forum. Retrieved January 3, 2012, from www.aypf.org/publications/SuccessAtEveryStep.pdf]

College Board TM

The Eight Components of College and Career Readiness Counseling chart is a comprehensive, systemic approach for school counselors' use to inspire all students to, and prepare them for, college success and opportunity — especially students from underrepresented populations. The eight components build

aspirations and social capital, offer enriching activities, foster rigorous academic preparation, encourage early college planning, and guide students and families through the college admission and financial aid processes. By implementing these eight components, school counselors provide information, tools and perspective to parents, students, schools and their communities that build college and career readiness for all students.

The eight elements:

- College Aspirations
- Academic Planning for College and Career Readiness
- Enrichment and Extracurricular Engagement
- College and Career Exploration and Selection Processes
- College and Career Assessments
- College Affordability Planning
- College and Career Admission Processes
- Transition from High School Graduation to College Enrollment

[Source: Excerpt Citation: The College Board National Office for School Counselor Advocacy: Eight Components of College and Career Readiness Counseling. Copyright © 2010. The College Board. www.collegeboard.org. Citation from National High School Center, Defining College and Career Readiness]

Center for American Progress

College-ready students are prepared learners and empowered customers with reliable information and support in high school and college and flexible financial assistance, able to design a college experience leading to degree completion and successful education-career transitions.

[Source: Center for American Progress

Excerpt Citation: Soares, L., & Mazzeo, C. (2008). College-ready students, student-ready colleges: An agenda for improving degree completion in postsecondary education.

Washington, D.C.: Center for American Progress. Retrieved Jan. 3, 2012, from www.americanprogress.org/issues/2008/08/pdf/highered3.pdf.]

Educational Policy Improvement Center (EPIC)

The college and career readiness model is composed of four "keys."

1. *Key Cognitive Strategies* describe the ways of thinking that are necessary for college-level work. They include formulating hypotheses and developing problem-solving strategies, identifying sources and collecting information, analyzing and evaluating findings or conflicting viewpoints, organizing and constructing work products in a variety of formats, and monitoring and confirming the precision and accuracy of all work produced.

2. *Key Content Knowledge* refers to key foundational content and "big ideas" from core subjects all students must know well, and an understanding of the structure of knowledge in core subject areas, which enables students to gain insight into and retain what they are learning.

3. *Key Learning Skills and Techniques* consist of two broad categories — student ownership of learning, which includes goal-setting, persistence, help seeking and self-efficacy; and specific learning techniques, such as time management, study skills, strategic reading, memorization techniques, collaborative learning and self-monitoring.

4. *Key Transition Knowledge and Skills*, or "college knowledge," encompasses specific knowledge necessary to select an appropriate college, to apply and be admitted, to obtain financial aid, to be focused on an appropriate career or major upon admission, to understand college-level norms and expectations, and to be a self-advocate within the institutional framework of colleges.

College and career readiness refers to the content knowledge, skills and habits young people and adults must possess to be successful in postsecondary education or training that leads to a family sustaining career. Prerequisite skills and capabilities include, but are not limited to, proficiency in reading a range materials, with an emphasis on informational texts; fluent writing in several modes, most notably expository and descriptive; quantitative literacy through algebra and including geometry, combined with the ability to understand and interpret data; an understanding of the scientific method and some insight into the organization of knowledge in the sciences; an awareness of how social systems operate and how they are studied; basic proficiency in a second language and awareness that languages reflect cultures; and experiences in and appreciation of creative and expressive arts. While not every student needs exactly the same proficiency in each of these areas, a student's interests influence the precise knowledge and skill profile necessary to be ready for postsecondary studies.

A student who is ready for college and career can qualify for and succeed in entry-level, credit-bearing college courses without the need for remedial or developmental coursework.

Some states have defined, or are in the midst of establishing, college and career readiness benchmarks based on outcomes in postsecondary institutions. These benchmarks can take the form of assessments or course completion.

Being college ready and career ready are similar but not necessarily the same. Analyses of college courses find that the learning skills and foundational knowledge associated with college success overlap considerably with those necessary for success in training programs that lead to careers. Given this overlap, it serves no useful purpose to separate students into two groups, one bound for college, the other for work. All students aspire to enter the workforce, and, to do so, all will need a comparable set of foundational skills and learning abilities if they are to succeed in their careers.

[Source: Excerpt Citation: Conley, D. T. (2012). A brief summary of college and career readiness. Retrieved from www.epiconline.org]

National Assessment Governing Board

How the National Assessment of Educational Process (NAEP) will define preparedness: The Technical Panel recommends research that will develop NAEP reports of academic preparedness:

- For college, academic preparedness refers to the reading and mathematics knowledge and skills necessary to qualify for placement into entry-level college credit courses that meet general education requirements without the need for remedial coursework.
- For the workplace, academic preparedness refers to the reading and mathematics knowledge and skills needed to qualify for job training.

[Source: Excerpt Citation: Achieve. (n.d.). *Preparedness of 12th Graders*. Washington, D.C.: Author. Retrieved March 13, 2012, from http://nagb.org/newsroom/PressReleasePDFs/12thgrade-brochure.pdf.]

International Network for Public Schools

Internationals Network's College Readiness Initiative links and supports International High School activities that promote a greater awareness of postsecondary educational access and success for immigrant English language youth. College readiness entails promoting an early awareness of the U.S. postsecondary system, strengthening content and language development in preparation for postsecondary success, and a program of transition into the postsecondary system. Our initiative builds on the assets of the immigrant experience and aligns that experience with a successful integration into college and/or the world of work.

[Source: Excerpt Citation Internationals Network for Public Schools. (n.d.). College readiness. New York: Author. Retrieved Jan. 3, 2012, from www.internationalsnps.org/our-services/our-services-college-readiness.html]

U.S. Department of Education

The USDOE does not provide a clear definition of what it is to be college and career ready but defines what the standards should include.

College- and career-ready standards:

Content standards for kindergarten through 12th grade that build toward college- and career-ready graduation requirements (as defined in this document) by high school graduation. A states college- and career-ready standards must be either (1) standards that are common to a significant number of states; or (2) standards that are approved by a state network of institutions of higher education, which must certify that students who meet the standards will not need remedial course work at the postsecondary level. [Source: U.S. Department of Education, Definitions www.ed.gov/race-top/district-competition/definitions]

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