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Preparing Before Proceeding:

A Call to Delay NY Inspires



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Preparing Before Proceeding: A Call to Delay NY Inspires

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Executive Summary

New York is seeking to launch one of the largest and most ambitious educational experiments in recent history. A new competency and performance-based learning initiative, called [NY Inspires](#), which includes the recently adopted Portrait of a Graduate framework, will redefine how the state assesses the graduation readiness of its 2.2 million students.

The goal of NY Inspires is to develop a graduation readiness system that moves away from traditional learning and assessment models in favor of competency and performance-based pedagogy, curricula, learning standards, and assessments designed to meet the evolving needs of the 21st century student.

EdTrust-New York welcomes the opportunity to modernize our expectations for students and develop rigorous, flexible, and innovative systems to assess student learning, particularly for students with disabilities and multilingual learners. We believe every New York student should have access to engaging learning opportunities that develop the skills and dispositions outlined in New York State Education Department's (NYSED's) [Portrait of a Graduate Framework](#).

We have deep concerns, however, about the current roll-out of NY Inspires. New York's current K-12 system is not prepared to equitably implement the sweeping changes to teaching, learning and assessment that NY Inspires requires. This is particularly true for the many New York districts that already struggle to help students meet proficiency standards in math and reading.

On the most recent National Assessment of Education Progress (NAEP), only [26% of New York 8th graders were proficient or above in math](#) and [31% in reading](#). Black, Latinx and Students with Disabilities are notably behind the average proficiency rating.

Percentage of New York 8th graders proficient or above

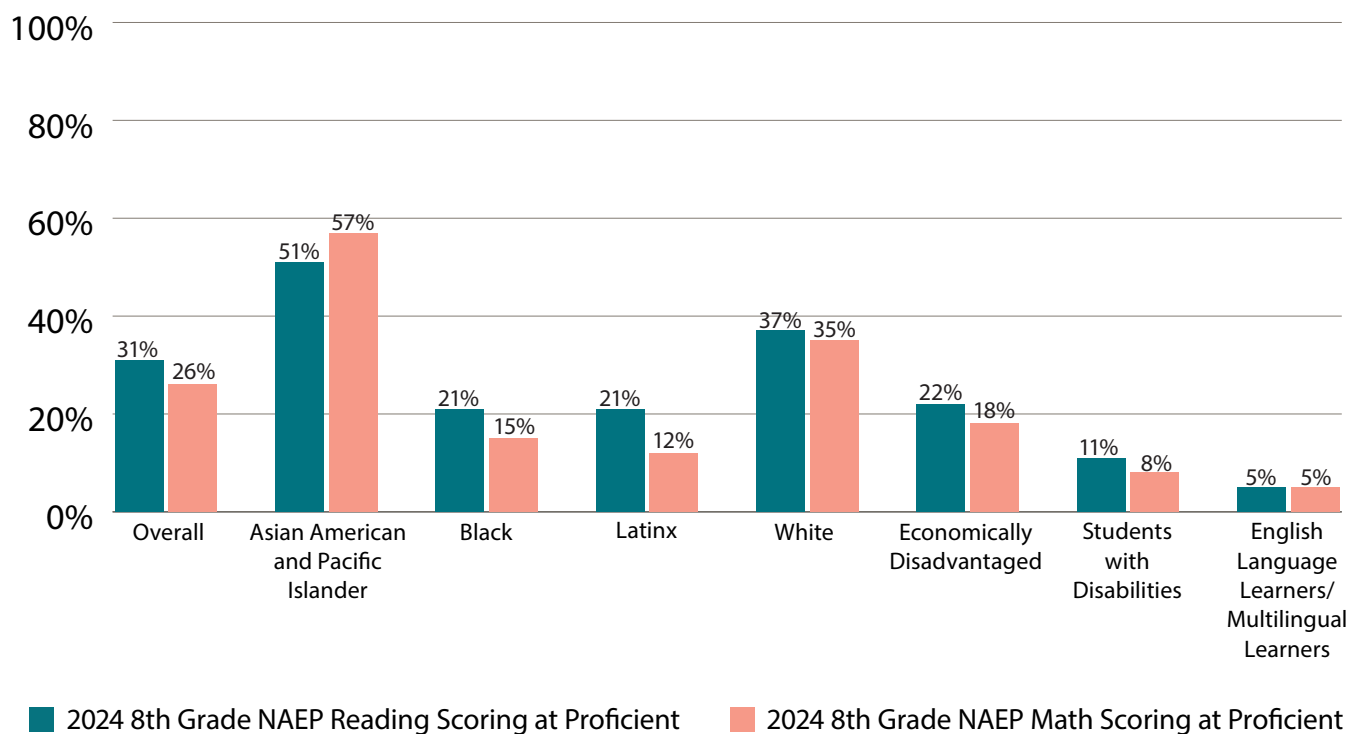
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In Philadelphia, approximately 40% of graduates in 2025 used pathways that rely on industry credentials, roughly twice the statewide rate. One of the most popular options for demonstrating graduation readiness was a free two-hour online course on ladder safety.

2024 8th Grade NAEP Percent of Students Scoring at Proficient or Above



**There are not sufficient data to provide Native American proficiency rates*

[Less than half of 8th graders](#) were proficient in math on the most recent New York State assessments¹. This means that a majority of students are entering high school without the basic skills needed to meaningfully participate in NY Inspires.

At the same time, NYSED has failed to explain how it will establish clear, consistent, and equitable standards for determining whether students have the skills they need to succeed after high school. The department has not provided districts, schools, students, educators, and families with sufficient clarity, guidance, or time to prepare for changes scheduled to begin in less than a year.

The experience of other states that have attempted similar reforms reveal that simultaneously changing graduation requirements and shifting to a competency-based system of teaching and learning can lead to significant challenges—in fact, several states abandoned their efforts after years of implementation. We are particularly concerned about the [experience of Pennsylvania](#), where early implementation of its multiple graduation pathways has highlighted disparities between high-need and more affluent districts. In Philadelphia, approximately 40% of graduates in 2025 used pathways that rely on industry credentials, roughly twice the statewide rate. One of the most popular options for demonstrating graduation readiness was a free two-hour online course on ladder safety.

¹ Disaggregated data for the 2025-26 New York State Assessments has not been released yet. EdTrust-New York is calling for NYSED to release preliminary disaggregated data by the end of the school year and publicly present that data to the Board of Regents as was done up [until 2019](#).

As a result, EdTrust-New York is concerned that NY Inspires could have unintended consequences that:

- ❖ Worsen inequity by creating uneven graduation pathways between and within districts and schools;
- ❖ Undermine consistent comparisons of post-secondary readiness across New York's more than 700 school districts and 1,300 schools serving high school students;
- ❖ Allow schools and districts to adopt pathways that lack sufficient rigor, leaving students unprepared for success in college and careers;
- ❖ Make it harder for families, policymakers, and the public to hold NYSED and districts accountable for student performance by reducing access to consistent, and objective assessment data;
- ❖ Overburden school leaders and teachers by requiring them to design and implement performance-based learning and assessments without sufficient guidance, capacity, or funding;
- ❖ Divert attention and resources from New York's [math](#) and [literacy](#) crisis in grades K-8, where stronger foundational skills are essential to attain the competencies of the Portrait.

Our outreach across the state over the last year has found that these concerns are shared among key stakeholders, including educators, school board members, families, business leaders, and equity advocates. The stakes are simply too high for NYSED to start an unprecedented experiment on New York students without a thoughtful, rigorous, and equitable plan in place.

Due to these concerns, EdTrust-New York is urging state leaders to delay the rollout of NY Inspires for two years and consider a phased-in implementation starting with 9th graders in the 2028-29 school year in strategically identified districts across the state.

This two-year pause will allow more time for:

- ❖ State leaders to provide additional guidance and clarity to districts on NY Inspires implementation;
- ❖ Districts to build capacity for the teaching, assessment, and administrative changes that NY Inspires will bring to schools;
- ❖ Educators to secure professional learning to support and evaluate performance-based learning in the classroom;
- ❖ Students to improve their reading and math skills through high-impact tutoring and other proven strategies that prepare them for success in high school;
- ❖ New statewide reforms in K-8 math and reading instruction to be implemented;
- ❖ Development of a new Statewide Longitudinal Data System (SLDS) that can monitor the short- and long-term impact of NY Inspires on student outcomes.

Four Critical Questions NYSED Must Answer Before Implementation

Far too many questions remain about how NY Inspires will be equitably implemented across New York's over 700 school districts. Before the state moves forward with implementation of NY Inspires, it must answer key questions, such as:



Regents Exams: What Role Will They Play in Graduation and Accountability?

While federal law requires that New York continue to assess all students in high school, the following remains unclear:

- ❖ Can students, schools, and districts still use a passing score on Regents exams to demonstrate graduation readiness? During the [September Board of Regents meeting](#), NYSED stated that districts could not withhold a diploma solely because a student failed a Regents exam. However, it remains unclear whether students could use Regents exam results as one option for demonstrating readiness, leading to confusion among schools.
- ❖ How will the state ensure at least 95% of students take the Regents exams as required by federal law? New York already falls far short of meeting this requirement, and with exams decoupled as a graduation requirement, participation is highly likely to decrease. This will make it more difficult to get reliable statewide data to monitor student progress and target resources to student needs, potentially violating a [key civil rights provision](#) designed to hold schools accountable for student progress, particularly in high-need districts.
- ❖ How will NYSED ensure that students do not end up taking more assessments? NYSED [recently shared](#) they are planning to introduce new statewide exams in grades 9-11, in addition to Regents exams, and new local assessments, which could lead to a significant increase in the number of assessments students must take in high school.
- ❖ Will students continue to be able to take Regents exams in school? NYSED has told state leaders that students will need to take Regents exams off-site, raising access and equity concerns.



Local Assessment Systems: How Will NYSED Ensure Consistent Standards Across Districts?

The [September Board of Regents meeting](#) highlighted that districts must develop a "local assessment system" during the 2027-28 school year. Since NY Inspires will decouple Regents exams as a graduation requirement next year, there will be no required local or state assessment available to determine student readiness for the class of 2028, raising concerns about how to evaluate the preparedness of these nearly 200,000 students.

Additionally, key questions about local assessment systems remain, including:

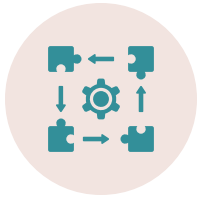
- ❖ Will the state develop equity guardrails that ensure every district assessment system has rigorous readiness measures that are comparable between districts and schools?
- ❖ Will the state require districts to include key equity guardrails or just provide guidance that leaves decisions to district and individual charter schools' discretion?
- ❖ Will the state provide a menu of approved, rigorous readiness measures that district assessment systems must select from or allow districts to create their own system?
- ❖ Will NYSED review, approve, and monitor each district's local assessment system?
- ❖ How should districts create local assessment systems? What learning standards should they be aligned with to assess student readiness?
- ❖ How will NYSED hold districts accountable for rigorous local assessment systems and monitor their outcomes?
- ❖ How will the state prevent disparities in rigor between high-need and low-need districts and within districts and schools?
- ❖ Can externally validated assessments such as AP, IB, and SAT be included in local assessment systems? If so, how will the state expand equitable access to these programs and assessments for all students?
- ❖ How will the state ensure that industry credentials are rigorous and aligned to state workforce needs?
- ❖ How will districts, schools, and educators ensure inter-rater reliability of performance-based learning assessments?



Portrait of a Graduate: What Will Students Be Expected to Know and Do?

NYSED's timeline shows that students will begin being assessed on the Portrait of a Graduate competencies in the 2029-30 school year, raising several questions:

- ❖ Will students still need to earn credits and show proficiency in core subject areas like math, reading, science, and social studies?
- ❖ How will students be evaluated on the Portrait of a Graduate competencies? Will they be in addition to or in lieu of core subject areas?
- ❖ How and when will NYSED develop rubrics and learning standards aligned to the Portrait of a Graduate?



Implementation Capacity: How Will NYSED Ensure Schools Are Ready?

NY Inspires will require significant new work at all levels of the K-12 education system, which will need to transform teaching and learning at the classroom, school, and district levels, leading to questions such as:

- ❖ Will districts receive funding to develop and implement NY Inspires?
- ❖ How will NY Inspires ensure that students who are not proficient in math and reading have the foundational skills needed to meaningfully participate in NY Inspires?
- ❖ What will NYSED do if there is a significant gap between graduation rates and outcomes on the new content area (e.g. ELA and Math) 9-11 state assessments?
- ❖ How will NYSED increase their capacity to support, monitor, and assess individual district readiness to implement NY Inspires?
- ❖ How will NYSED ensure inter-rater reliability across schools and districts on performance-based learning assessments?
- ❖ How will NYSED meaningfully engage key stakeholders, including district leaders, educators, families, students to ensure all considerations for implementation of NY Inspires — including professional learning and family communications — are incorporated into the rollout?

Six Risks That Could Undermine NY Inspires' Promise

EdTrust-New York recognizes the need to thoughtfully redefine graduate readiness to move away from Regents exams and towards a more innovative system to assess college and career readiness. We are concerned, however, that NYSED's current plan lacks the transparency, detail, and equity guardrails that must be firmly in place before NY Inspires is implemented and begins affecting thousands of New York students and educators in less than a year.

There are six leading concerns, that if not addressed, could reinforce longstanding inequities and make it even less likely that students of color—particularly Black Latinx, Native American, and Asian and Pacific Island students, those from low-income backgrounds, multilingual learners, and students with disabilities are prepared for post-secondary success.

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Without substantially increased investments and equity-based capacity building ahead of implementing NY Inspires, these longstanding inequities could produce disparately educated cohorts of graduates



Widen Opportunity Gaps

NY Inspires' promotion of alternative pathways and assessments is influenced by deeper learning and project-based learning pedagogies, which are increasingly viewed as best practices in education. These educational approaches emphasize experiential, collaborative, and real-world learning, often relying on smaller class sizes, skilled teachers, well-resourced internships, and community partnerships — all of which contributes to a students' college and career readiness.

Access to these opportunities, however, is [not equitable](#) across New York. Wealthier districts will be better positioned to develop alternative pathways, invest in teacher training, offer access to [advanced coursework](#), and establish workforce partnerships. Meanwhile, less affluent districts will lack the funding and capacity needed to scale these pedagogies and could consequently be forced to rely more heavily on less rigorous pathways, as has happened in other states, such as [Pennsylvania](#).

Without substantially increased investments and equity-based capacity building ahead of implementing NY Inspires, these longstanding inequities could produce disparately educated cohorts of graduates depending on which of New York's more than 700 districts and 1,300 schools serving high school students they attend, reinforcing and widening the gaps in opportunities and outcomes NY Inspires aims to address.



Erode Confidence in a New York Diploma

Evaluating potentially [700 different graduation pathways](#) (more if schools within districts make different choices) will be no easy task.

Without a statewide, objective measure of readiness — and a current lack of guidance from NYSED on what are indicators of readiness — it will be difficult for state and district leaders to determine how graduates are prepared for success, and how different learning portfolios should be evaluated against one another. This could result in real challenges for students, families, colleges, and employers.

Thousands of students from across the state may hold the same diploma and have completed the same pathway in name, but their learning experiences and skill mastery could be dramatically different based on which school and district they attended.

This means colleges will not be able to make comparisons necessary for admissions decisions between students from different schools and districts, even in similar diploma pathways.

Employers will face a similar challenge. They will not know what skills students who have completed similar pathways have earned if there are no consistent standard or assessment system to demonstrate high-quality learning opportunities across schools and districts.

The bottom line: without clear, consistent guidance across New York, employers, colleges, and other stakeholders will be in the dark about whether students have the preparation and the skills necessary for success. This will make it even more likely for employers, colleges and other stakeholders to resort to evaluating a student's readiness based on the reputation and resources of their school or use of validated external assessments like SAT scores to determine readiness, undermining the whole premise of NY Inspires.

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Lower Academic Expectations

The challenge of comparability also raises concerns about rigor and inter-reliability: ensuring that all students are held to the same clear, high standards and provided the necessary resources and supports — including access to challenging and advanced coursework — to meet them. Consistent rigor must be monitored, applied, and evaluated both within and across multiple pathways at the district and school level.

NY Inspires promises One Diploma for All will ensure “fairness and consistency” across all pathways — but NYSED and the Board of Regents have yet to make clear how they will make this a reality. They have also indicated there will be seals or endorsements, which could replicate the same dynamic between local, Regents and Advanced Regents diplomas where some seals represent a higher level of rigor and preparedness than others.

Rigor is the gateway to deeper learning — and as already stated, the resources and capacity building required for actualizing holistic pedagogy are not equitably distributed. To maintain and increase graduation rates under NY Inspires, districts may be incentivized to create less rigorous pathways, particularly for underserved students who are already struggling to meet grade level proficiency in reading, math and science. Indeed, we have [seen that happen in states](#) that have attempted similar efforts.



Mask Persistent Learning Gaps

NYSED's pivot away from standardized testing and Regents exams could not come at a more inopportune moment.

Detailed in EdTrust-New York's [recent graduation rates brief](#), Black and Latinx students, multilingual learners, and students with disabilities are graduating at disproportionately lower rates than other students since pandemic exemptions ended in 2022. While drops in graduation rates are concerning, this shift signals that underserved students are not getting access to the educational opportunities needed to meet state academic standards. For example, even with the state's current [85% graduation rate](#), only [56% of New York students passed the Algebra 1 Regents Exam](#) and only [26% of 8th graders](#) were proficient or above in Reading on the 2024 NAEP, revealing a disconnect between graduation rates and academic readiness.

EdTrust-New York is deeply concerned that the shift away from Regents exams as a graduation requirement will mirror and exacerbate what happened during the pandemic: without an objective and rigorous graduation measure, graduation rates will increase, masking the real learning challenges students continue to face in core subject areas.

We recognize a student's ability cannot be measured solely with a test score, but Regents exams provide a baseline understanding of where our students are at, and whether they are proficient enough in the foundational skills required in core subjects to be able to successfully pursue higher education or the workforce in a meaningful way. At this moment, they serve as an important accountability mechanism for NYSED, parents, and policymakers, particularly when existing data are already revealing significant disparities in student outcomes.

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Strain District and Educator Capacity

Shifting curricula and assessments within core subjects to comply with both the Next Generation Learning Standards and the six competencies of Portrait is a significant task. It requires multiple years of instructional planning and sequencing to be solidified by district leaders before it is passed on to school leaders and ultimately implemented by individual educators. Achieving this will also require updated and rigorous professional development to ensure effective and consistent delivery to students.

These necessary shifts will put a strain on district capacity to develop their own standards, rubrics, and local assessments with no current guidance or funding from NYSED. Educator capacity will also be tested as they tailor their pedagogy to these new standards and local assessments, particularly if they are performance-based assessments.

Schools and districts that successfully use performance-based assessments [have taken years to develop and refine](#), with a particular need to support the number of additional hours it takes for educators to develop, administer and rate performance tasks.

In an analysis of two Virginia school districts' attempts to develop performance-based assessments (PBA), 'time' was one of the key variables that impacted quality implementation. The [average PBA took two to four weeks to implement](#). Educators said this timeline did not include the significant amount of time that was allocated to developing the PBA. Additionally, one of the key reflections cited by the educators was the need for more time to ensure students were prepared to internalize the new expectations and procedures.

This preparation might be manageable if it were to be rolled out in stages, or classroom by classroom, with dedicated professional learning hours and funding available — and with the clear implementation guidelines, rubrics and competency-based assessments and evaluations provided. However, with still very little guidance shared from NYSED, it will create significant strain on the key stakeholders responsible for executing NY Inspires in the classroom.



Deepen New York's Math and Literacy Crisis

There is a major caveat to NY Inspires and the Portrait of a Graduate — it assumes all students are entering high school at grade level in core subjects. [This is not the case](#). Proficiency in reading and basic math skills is abysmally low across the state, as has been detailed in EdTrust-New York's most recent [literacy analysis](#) and [math report](#).

If the state is to successfully assess readiness using the Portrait, the floor must be raised. NYSED and state leadership must prioritize, invest in and expand evidence-based initiatives that are proven to get students back on grade level, like high-quality instructional materials, tutoring, and tiered interventions in math and reading.

NY Inspires runs the risk of distracting districts from addressing these learning gaps, and the essential work that is required to ensure more students reach high school with the foundational reading and math skills needed to meaningfully participate in an initiative like NY Inspires.



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Lessons From Other States: What New York Must Get Right

Across the country, states have sought to move beyond traditional graduation requirements and standardized exit exams, giving students new ways to demonstrate their knowledge and skills. Some states, including Maine, New Hampshire, Vermont, and Rhode Island, have pursued broader transitions toward competency-based education and performance-based assessments. Others, including Colorado, Pennsylvania, and Massachusetts, have focused on expanding graduation pathways while retaining or adapting existing requirements.

These experiences offer important lessons for New York: changing how students earn a diploma alone does not improve what they learn or ensure they are prepared for college, careers, and civic engagement. States have encountered [significant challenges](#) in establishing consistent academic expectations, preparing districts and educators for new requirements, and ensuring that expanded pathways provide equitable access to rigorous learning. It's also important to note that most of these states are smaller and less diverse than New York, making the scale of NY Inspires even more challenging for implementation.

As New York implements NY Inspires, it must look beyond the Portrait of a Graduate framework to the policies, resources, and safeguards needed to make the Portrait come to life.

Four lessons from other states are particularly important:



Establish clear statewide expectations;



Phase in reform at a sustainable pace;



Invest in implementation capacity; and



Make equitable access and outcomes a condition of success.

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Set Clear Statewide Expectations to Protect Rigor and Comparability

States that have expanded graduation pathways or adopted competency-based education offer a critical lesson for New York: **local flexibility must be balanced with clear, consistent, and rigorous statewide expectations for what students must know and be able to do.** Without shared definitions of proficiency and reliable methods for evaluating student learning, NY Inspires has the potential to exacerbate existing inequities across the state.



Vermont illustrates the risks of relying heavily on locally defined graduation requirements. Beginning with the class of 2020, the state required [proficiency-based graduation standards](#). This led to concerns about equity and comparability, with a [2024 U.S. Department of Education review](#) identifying inconsistencies in the rigor of locally determined graduation requirements and flexible pathways. [In 2025, the Legislature directed the State Board of Education](#) to establish common statewide graduation requirements that are scheduled to take effect in the 2027–28 school year, beginning with the graduating class of 2031. This shift reflects the state’s effort to establish greater consistency and equity while preserving flexibility in how students demonstrate proficiency.



New Hampshire offers an example of how performance-based assessments can operate within a competency-based education system. Local school boards establish competencies aligned with state graduation requirements and determine how students demonstrate proficiency. The state’s [Performance Assessment of Competency Education \(PACE\)](#) initiative sought to strengthen comparability through a [structured system](#) of performance assessments, common expectations, and evaluation. [Research](#) found that participating students performed about as well on state English language arts and mathematics assessments as comparable students in non-PACE schools after five years of implementation. These findings suggest that performance-based assessment need not come at the expense of academic achievement, nor do they increase academic achievement on their own.



Maine [demonstrates](#) the challenges of translating statewide proficiency requirements into consistent local practice. After adopting a proficiency-based diploma mandate in 2012, the state amended its law in 2018 to allow districts to award either proficiency-based or credit-based diplomas. [Research conducted during implementation documented both progress and substantial challenges](#) as districts developed the instructional practices, assessments, grading systems, and educator capacity necessary to support the reform. Maine’s experience underscores that statewide mandates alone cannot ensure consistent expectations or implementation. States must also provide clear guidance, sustained professional learning, and the infrastructure needed to evaluate proficiency reliably.



Colorado and Pennsylvania illustrate how states can expand [graduation pathways](#) within a more defined statewide framework. [Colorado requires](#) students to demonstrate readiness in reading, writing, and communication and mathematics through [a state-approved menu](#) of options, including assessments, advanced coursework, career-readiness credentials, and district-developed capstone assessments. Pennsylvania similarly [provides five pathways](#) for meeting statewide graduation requirements, supported by state guidance and implementation requirements. Both states allow districts flexibility while maintaining common statewide expectations. However, these approaches also raise important equity questions: when districts determine which pathways to offer, students may have unequal access to opportunities to demonstrate readiness, as demonstrated by the disparities noted earlier in Philadelphia.



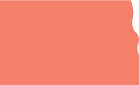
Rhode Island offers another example of balancing statewide academic expectations with locally designed demonstrations of learning. Following the adoption of proficiency-based graduation requirements in 2016, the state approved new [Readiness-Based Graduation Requirements](#) in 2022, which take effect with the graduating class of 2028. The revised requirements [establish college- and career-preparatory coursework](#) as the default expectation for all students, including Algebra I, Geometry, and Algebra II, while permitting approved alternative readiness pathways. Students must also complete at least one performance-based diploma assessment [demonstrating applied learning and proficiency](#) in one or more content areas. Although assessments must align with state standards, districts establish their own scoring criteria. Yet local discretion over assessment design and scoring raises questions about comparability across districts. Because the new requirements have not yet taken effect, their impact on academic preparation and graduation outcomes remains uncertain.



Massachusetts provides further caution for states moving away from a single graduation examination. Following voters' [elimination of the MCAS graduation requirement in 2024](#), the state revised its [Competency Determination requirements](#) to combine mastery of a common core of knowledge and skills with locally certified coursework. A subsequent statewide graduation-requirements review identified limitations in the existing competency standard, including its focus on academic expectations through grade 10 and reliance on districts to certify student mastery. The review recommended a [more comprehensive](#) statewide framework for graduation readiness. Massachusetts' experience illustrates that eliminating a standardized graduation examination does not eliminate the need for clear, rigorous statewide expectations or reliable evidence that students have met them.

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North Dakota offers an example of establishing common learning expectations while allowing districts flexibility in how they implement competency-based education. Beginning in 2017, the state [authorized districts to pursue innovative approaches to instruction, assessment, and credit accumulation](#). It subsequently developed a statewide [Learning Continuum](#), identifying competencies and expectations for demonstrated mastery, while allowing participating districts to adopt local mastery frameworks. North Dakota also established its [Choice Ready framework](#) to measure students' preparation for college, careers, and military service. Although the state has not adopted a universal competency-based graduation requirement, its approach demonstrates the value of developing shared expectations for student learning before expanding alternative approaches. At the same time, locally developed mastery policies underscore the need for mechanisms to ensure that students demonstrate comparable levels of readiness across districts.



Implications for New York: NY Inspires must establish a clear statewide definition of graduation readiness and specify the knowledge and skills all students must demonstrate, regardless of the pathway they pursue. New York should develop common standards for the rigor, quality, and criteria for local assessments, along with transparent criteria for determining whether students have met the required competencies.

Where districts have flexibility to design assessments or select graduation pathways, NYSED should establish mechanisms for validating assessment quality, calibrating scoring, and monitoring consistency across schools and districts. The state must also align graduation requirements with curriculum, instruction, grading, credit accumulation, assessment, and accountability policies.



Phase in Reform at a Pace Districts Can Sustain

States' experiences demonstrate that transforming graduation requirements is a multiyear undertaking that must be based on district readiness, careful sequencing, sustained preparation, and opportunities to evaluate and adjust implementation. Even when states establish clear graduation standards, districts need time to translate those expectations into instructional practices, assessments, grading policies, and systems for determining whether students have demonstrated proficiency.

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Maine [illustrates the risks](#) of advancing reform without sufficient implementation readiness. After adopting a statewide proficiency-based diploma mandate in 2012, the state repeatedly extended implementation timelines and modified requirements as districts struggled to develop the necessary systems. **In 2018, Maine reversed its mandate, allowing districts to return to credit-based graduation requirements.** Its experience demonstrates the challenges of using a statewide mandate, rather than a phased approach based on district readiness.



Rhode Island adopted [updated graduation regulations](#) in 2022 that will first apply to the class of 2028, providing districts six years to prepare for [new coursework and performance-based assessment requirements](#).



Colorado similarly developed its [graduation guidelines over several years](#) before implementation, allowing more than 8 years between adoption of its graduation guidelines in 2013 and full implementation in 2022. During this period, the [state refined graduation options, engaged educators and stakeholders, developed implementation resources, and gave districts time](#) to align their local graduation requirements with statewide expectations.



Pennsylvania repeatedly [delayed](#) its original graduation examination requirements before establishing [five alternative pathways](#) that took effect with the class of 2023, following state guidance to districts in 2019.



North Dakota illustrates the benefits of sequencing reform based on district readiness rather than requiring simultaneous statewide implementation. The state began with a small cohort of districts implementing personalized, competency-based learning and provided flexibility for participating schools to redesign instruction, assessment, and credit accumulation. Over several years, North Dakota developed [statewide learning frameworks](#), expanded participation through a network of districts and higher education partners, and refined its implementation supports. Rather than establishing a deadline for universal adoption, the state has allowed districts to participate as they develop the capacity to implement new approaches. **This experience suggests that a gradual, voluntary phase-in can provide opportunities to test new systems, identify implementation challenges, and build district readiness before considering broader requirements.**



Implications for New York: NY Inspires should follow a phased, multi-year implementation process tied to demonstrated district readiness rather than fixed deadlines alone. New York should continue piloting new assessment and graduation models in districts with relevant experience, while providing other districts time and support to prepare. Before expanding statewide, NYSED should establish clear readiness benchmarks for educator preparation, assessment quality, scoring consistency, and student supports. Independent evaluation should assess implementation and student outcomes, with findings informing revisions before requirements become mandatory statewide. The state should not make students' graduation contingent on new systems until it has demonstrated that districts can implement them reliably and equitably.



Invest in the Capacity Required to Deliver Reform

States' experiences demonstrate that transforming graduation requirements requires more than establishing new standards and pathways. Competency-based education and performance-based assessments demand significant changes to instruction, assessment, grading, and how schools document student learning. Without sustained state investment and implementation support, districts may struggle to meet new requirements, and differences in local resources and expertise may produce inconsistent results.

Maine [illustrates](#) the consequences of requiring districts to develop new systems without sufficient statewide infrastructure. Research on its proficiency-based diploma initiative documented challenges with developing assessments, aligning grading practices, and preparing educators to implement the reforms. These difficulties contributed to uneven implementation and the state's eventual reversal of its mandate in 2018.

New Hampshire offers an example of more structured state support. Through its Performance Assessment of Competency Education (PACE) [initiative](#), participating districts collaborated to develop performance assessments, scoring rubrics, and processes for evaluating student work. The initiative emphasized educator professional learning and scoring calibration to improve assessment quality and consistency. However, PACE operated in participating districts rather than statewide, raising [questions](#) about the resources and infrastructure necessary to scale such an approach.

Vermont developed proficiency frameworks and model scoring scales to guide local implementation, but districts continued to bear substantial responsibility for translating these resources into instructional and assessment practices. Its [experience](#) illustrates the limitations of providing statewide guidance without ensuring consistent local capacity to implement it.

Rhode Island established its [Let's Get Ready Community of Practice](#) to support implementation of its updated graduation requirements. The initiative brings educators and school leaders together to develop implementation plans, share effective practices, and address challenges. This approach recognizes that successful reform requires sustained collaboration and opportunities for educators to learn from one another.

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Colorado provides [guidance and tools](#) for implementing its graduation pathways, while **Pennsylvania** offers a graduation requirements [toolkit](#) to help districts navigate its five pathways. **Washington** has developed model performance assessments, scoring rubrics, and implementation [guidance](#) that can help districts design and evaluate student work.



North Dakota provides a particularly relevant example of sustained investment in implementation capacity. The state [partnered with KnowledgeWorks](#) and other organizations to provide multiyear technical assistance, professional learning, and opportunities for collaboration among an initial cohort of districts implementing personalized, competency-based education. It subsequently established the [North Dakota Network for Personalized Learning](#), bringing together participating districts and higher education partners to share practices and strengthen implementation. North Dakota's experience demonstrates the importance of creating an ongoing infrastructure for educator learning, technical assistance, and assessment development rather than relying primarily on regulations, guidance documents, or one-time professional development. Although evidence of improved student academic outcomes [remains limited](#), the state's sustained approach offers a useful model for building the capacity required to implement complex reforms.



Implications for New York: NYSED must establish a statewide implementation infrastructure before requiring districts to adopt new graduation models. This should include common assessment frameworks, high-quality model performance tasks and scoring rubrics, sustained professional learning, opportunities for collaborative assessment development and scoring calibration, and ongoing technical assistance.

New York must also provide dedicated, multiyear funding for educator planning time, assessment development, instructional coaching, and technology, with additional support for high-need districts. Finally, readiness should be demonstrated through objective benchmarks, not simply district willingness to participate. Without these investments, NY Inspires risks creating an unfunded mandate that widens disparities in districts' capacity to deliver rigorous graduation pathways.

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Make Equity a Condition of Implementation, Not an Afterthought

Expanding graduation pathways can create more meaningful opportunities for students to demonstrate learning, but it can also reinforce existing inequities if students have unequal access to rigorous coursework or are directed toward pathways with different academic expectations. NYSED must ensure that flexibility expands equity and opportunity rather than creating different standards for students based on where they attend school or their backgrounds.

Rhode Island offers an example of using equity concerns to inform graduation reform. A statewide [educational opportunity audit](#) identified substantial disparities in students' access to college-preparatory coursework. The state's [revised graduation requirements](#) establish more consistent coursework expectations while allowing alternative ways to demonstrate readiness. Its approach recognizes that expanding assessment options alone cannot address inequities in students' opportunities to learn the material being assessed.

Pennsylvania illustrates the potential risks of multiple pathways with different requirements. Early implementation has [raised questions](#) about whether students in high-need districts disproportionately rely on alternative, less rigorous pathways. In Philadelphia, approximately 40% of 2025 graduates reportedly used less rigorous pathways, roughly twice the statewide rate. These differences raise concerns about whether all pathways reflect comparable academic preparation and whether students have equitable access to the coursework and supports needed to pursue more rigorous options.

Vermont's move toward new, more [traditional statewide graduation requirements](#) similarly reflects concerns about inconsistent academic expectations when districts independently define proficiency.

North Dakota has framed personalized, competency-based education as a strategy for expanding opportunities for students to learn at different rates and demonstrate proficiency in multiple ways. Its [Choice Ready framework](#) also recognizes multiple forms of postsecondary preparation. However, because participation in competency-based learning initiatives is voluntary, students' access to these approaches depends partly on whether their districts choose to participate and have the resources to implement them effectively. This raises an important equity consideration: flexibility intended to expand opportunity can produce uneven access when implementation depends on local capacity. North Dakota's experience reinforces the need for states to establish equitable access requirements, monitor participation and outcomes across student groups, and direct additional implementation resources to districts with the greatest needs.

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Implications for New York: NYSED must establish enforceable equity safeguards before implementing new graduation pathways. Districts should demonstrate that all students have access to rigorous coursework and high-quality assessments. The state should establish transparent criteria for pathway eligibility, guard against steering students into less rigorous options, and ensure students and families receive clear information about the implications of different pathways.

NYSED should also publicly report pathway participation, competency attainment, graduation rates, and postsecondary outcomes by district and student subgroup. Independent evaluation should examine whether pathways provide comparable preparation for college and careers and identify disparities requiring corrective action.

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Recommendations



Delay Implementation and Convene a Representative Statewide Task Force

EdTrust-New York urges NYSED and the Board of Regents to delay the rollout for two years until more clarity and a stronger implementation framework can be provided to district leaders, teachers, families, and students.

During this two-year pause, we urge state leaders to build on the Blue Ribbon Commission recommendations by convening a statewide taskforce of higher education institutions, workforce partners, educators, education leaders, students, families and education advocates to develop a rigorous college and career readiness plan that can be consistently implemented and measured across the state. This plan should prioritize developing stronger guidance that addresses concerns about system design, implementation, and capacity, including:

- ❖ Developing a system to assess district readiness for preparing students for post-secondary success and implementation of NY Inspires,
- ❖ Exploring development of a phased system of implementation based on district readiness,
- ❖ Developing equity guardrails to ensure rigor and comparability for all students,
- ❖ Planning for and investing in the capacity building needs of educators and school leaders to implement NY Inspires,
- ❖ Examining and revamping credit requirements for all four core subject areas,
- ❖ Finalizing and publishing new learning rubrics aligned to the Portrait of a Graduate competencies,
- ❖ Exploring and recommending the development of innovative new assessments, including expansion of performance-based assessments that balance rigor and flexibility, with special attention to meeting the unique needs of both students with disabilities and multilingual learners.



Build on Proven Models of Performance-Based Assessments

The [Consortium](#) Schools and their performance-based assessment are helpful models for rigorous, effective and measurable 21st-century learning that should be improved and scaled to meet the needs of NY Inspires.

This will require extensive collaboration with consortium school leaders and will require substantial investment to ensure these schools and their leaders and educators are not overstrained during this process of peer-to-peer learning and development.

Given the entire graduation system in New York is being redesigned, this is an opportunity to not simply replicate Consortium schools, but also further develop and revamp their rubrics, standards and assessments to meet the current state of pedagogy research.

This is also an opportunity to create systems of inter-rater reliability across the Consortium schools, to ensure they are using calibrated, consistent and comparable performance-based tasks and scoring methodology. NYSED should also use this as an opportunity to create systems to check the fidelity of implementation across classrooms, schools and districts to ensure they are truly comparable.



Strengthen K–8 Math and Reading Before Expanding Graduation Reform

Regardless of the NY Inspires timeline, state and district leaders need to put as much, if not more, energy into K-8 teaching and learning to make sure that more students have the foundational skills necessary to meaningfully participate in NY Inspires.

To ensure 9th grade students are ready to be assessed using the Portrait of a Graduate, NYSED must:

- ❖ Fund and implement a multi-tiered systems of support framework to ensure students who are not yet proficient in core content receive targeted interventions that support students getting back on grade level. This should include high dosage tutoring and other tiered interventions, and universal screening for math and reading skills.
- ❖ Invest in high-quality instructional materials in math and reading that are aligned to evidence-based ways of learning and teaching that expose students to grade-level content while also providing students with scaffolds, interventions, and just-in-time supports—including for students with disabilities and multilingual learners.
- ❖ Recommit to culturally relevant curricula that aligns with the science of reading and prioritizes phonological awareness, word recognition, fluency, vocabulary and oral language comprehension, and text comprehension, as well as advanced foundational skills for students in grades 4-8.



Build a Statewide Data System to Track Long-Term Student Outcomes

The efficacy of NY Inspires can only be partially proven in high school. It relies heavily on validation from post-secondary outcomes as well as workforce data that cannot be measured by NYSED alone. [This reinforces the need for a robust statewide longitudinal data system \(SLDS\) that can be used to track the success of this new system and inform its future iterations.](#)

While NYSED is currently working to build an SLDS in partnership with key statewide stakeholders, EdTrust–New York is recommending new legislation to establish an independent managing entity overseen by a diverse statewide Governing Board. The legislation would provide the Board with clear decision-making authority and require that the system is operational in the next two years, which would align with and complement a delay in NY Inspires implementation. This structure would establish clear accountability, promote transparency, and ensure that data—spanning early childhood education through workforce—outcomes are used to advance student success, inform policymaking, and improve educational equity across New York. It would also allow NYSED and other system leaders to see the long term outcomes of NY Inspires and new pathways to graduation and assess whether each pathway provides students with long-term postsecondary success.

Conclusion

A More Equitable Graduation System Starts with Getting the Implementation Right

There is no doubt the framework of public education needs a fundamental redesign that reflects the realities of the 21st century, the information age, the needs of the modern student, and the skills of the modern educator. EdTrust–New York appreciates NYSED’s desire to bring this new framework to life, but the system is not ready for such a transformative effort that has been hindered by a poorly developed rollout.

State leaders must address the concerns laid out in this brief before NY Inspires begins implementation. Otherwise, the initiative will only perpetuate the already stark inequities students of color—particularly Black, Latinx, Native American and Asian American and Pacific Island students—those from low-income backgrounds, multilingual learners, and students with disabilities must already navigate across the state.

The country historically looks to New York as a beacon of progress — NY Inspires, in time, can serve as an example of that progress, but only if the state pauses the current implementation in order to build the plane — in collaboration with experts and critical stakeholders — before it tries to fly it with our next generation on board.

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