



THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK

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December 22, 2021

Hon. Miguel Cardona
Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-6100

RE: Request for a Waiver of Statutory and Regulatory Requirements of Every Student Succeeds Act (ESSA) Pertaining to Accountability and Title I School Improvement Funds

Dear Secretary Cardona:

On behalf of the New York State Board of Regents and the New York State Education Department (NYSED or "the Department"), I am writing to submit to the United States Department of Education (USDE) a request for a waiver from certain provisions of the Every Student Succeeds Act (ESSA). Enclosed with this letter is detailed information and evidence regarding the need for a waiver to support schools in recovery as communities continue to face the impact of the ongoing COVID pandemic and how granting of this waiver will support both equity and student achievement. This waiver request is being submitted based upon ongoing consultation with and the support of Local Education Agencies and other stakeholders across the state.

Given the time sensitive nature of this waiver request, we respectfully seek an expedited review and decision by the USDE. As students, families, and school communities continue to need support during these challenging times, we eagerly await your positive response.

Sincerely,



Betty A. Rosa
Commissioner

Enclosures

cc: Kimberly Wilkins
Jason Harmon

**New York State Education Department (NYSED)
Sections 1111(c)(4) and 1111(d)(2)(C)-(D) Request for Waiver
Under the Every Students Succeeds Act (ESSA)**

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Hon. Miguel Cardona
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400 Maryland Avenue, SW
Washington, DC 20202-6100

RE: Request for a Waiver of Statutory and Regulatory Requirements of the Elementary Secondary Education Act (ESEA) on behalf of all LEAs in New York State

Dear Secretary Cardona:

Section 8401 of the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA) (hereafter referred to as ESSA), provides authority to the Secretary of the United States Department of Education (USDE) to waive certain statutory and regulatory requirements at the request of a State Educational Agency. By way of this letter, the New York State Education Department (NYSED or "the Department") is formally requesting a waiver of the accountability requirements in Sections 1111(c)(4), 1111(d)(2)(C)-(D), and 1003(b)(1)(a) on behalf of all Local Education Agencies (LEAs) in New York State.

As required in Section 8401 of ESSA, NYSED is submitting a formal request, containing the information described in subsection (b)(1) to the USDE for its consideration. This waiver request is being submitted based upon ongoing consultation with LEAs and other stakeholders across the state and a review of the impact of the ongoing COVID-19 pandemic. The Department is requesting New York State be granted a waiver of the identified sections for the 2021-22 school year. Below is a detailed plan that addresses each requirement in Section 8401(b)(1) of ESEA/ESSA.

A. Identify the Federal programs affected by the requested waiver.

Title I, Part A Improving Basic Programs Operated by Local Educational Agencies
Subpart 1- Basic Program Requirements, Section 1111 State Plans and Title I-Improving the Academic Achievement of the Disadvantaged, Section 1003 School Improvement.

B. Describe which Federal statutory or regulatory requirements are to be waived.

NYSED requests a waiver for the following statutory requirements:

- Accountability and school identification requirements in Sections 1111(c)(4) and 1111(d)(2)(C)-(D): the requirements that a State annually meaningfully

differentiate all public schools and the requirements to identify schools for comprehensive and targeted support and improvement and additional targeted support and improvement.

- School improvement requirements in Section 1003(b)(1)(a): the requirements that a State not allocate less than 95 percent of that amount to make grants to local educational agencies on a formula or competitive basis, to serve schools implementing comprehensive support and improvement activities or targeted support and improvement activities under section 1111(d).

C. Describe how the waiving of such requirements will advance student academic achievement.

New York State's Commitment to Diversity, Equity, and Inclusion

Numerous studies examining the effects of the pandemic have demonstrated that certain subgroups of students measured by the ESSA accountability system – students of color, students with disabilities (SWD), English language learners (ELL), and economically disadvantaged students – have been disproportionately affected by deep disparities in academic opportunity and mental health challenges.¹ As school communities of New York State continue to face the ongoing and differentiated impacts of the COVID-19 pandemic, the Board of Regents and NYSED are committed to making the promotion of diversity, equity, and inclusion the cornerstones of recovery. NYSED has responded to the needs of these students with policies that strengthen school communities and increased resources that can be used to drive evidence-based support.

At its April 2021 meeting, the New York State Board of Regents introduced a new Diversity, Equity, and Inclusion framework for New York State schools that will serve as the basis for forthcoming policy. The Board of Regents and the Department believe it is critically important to establish and communicate to all New Yorkers expectations for all students and all entities under the University of the State of New York. In a draft framework titled, “The NYS Board of Regents Framework on Diversity, Equity, and Inclusion in New York’s Schools: A Call to Action”² presented at that meeting, the Board of Regents asserted:

The Department, and the schools and districts it oversees, must use data to establish clear expectations for students and their families. They must set goals and targets that are connected to academic attainment and growth. The work we do must always focus on outcomes – and the outcome that matters most in our education system is student learning. ***However, merely reporting the numbers can cause us to focus on the symptoms of structural, institutional, and systemic inequities, losing sight of what lies beneath the surface, at the deeper policy level. For example, discussions of New York’s “achievement gap” can be misinterpreted if we fail to account for the lack of student opportunities to learn. As New York’s education policymakers, it is our***

¹ <https://www2.ed.gov/about/offices/list/ocr/docs/20210608-impacts-of-covid19.pdf>

² <https://www.regents.nysed.gov/common/regents/files/421brd1.pdf>

responsibility to go deeper than the numbers might initially reveal. (emphasis added)

The following month, at its May 2021 meeting, the Board of Regents discussed a new “Policy on Diversity, Equity and Inclusion.”³ The policy notes that:

A growing body of research finds that all students benefit when their schools implement strong Diversity, Equity and Inclusion (DEI) policies and practices – including academic, cognitive, civic, social-emotional, and economic benefits. Strong DEI policies, in partnership with parents and families, empower students from all backgrounds to visualize successful futures for themselves and provide them with a sense of belonging and self-worth. These benefits can lead to improved student achievement, which in turn can lead to better outcomes in other areas of their lives, including work and civic engagement. This is true regardless of a school’s geographic location or the demographic composition of its students and faculty.

With that understanding, the Board of Regents adopted the policy statement on DEI. That policy made it a priority to encourage and support efforts at the State and local level to create within every school an ecosystem of success built on a foundation of diversity, equity, inclusion, access, opportunity, innovation, confidence, trust, respect, caring, and relationship-building. All students must be welcomed in our schools and feel that they belong and are supported.

The Board of Regents and the Department believe that sustained academic success can happen for all students when thoughtful accountability is partnered with robust support and equity-minded decision making. As USDE noted in a February 22, 2021 letter⁴ to Chief State School Officers, “State assessment and accountability systems play an important role in advancing educational equity.” NYSED agrees and believes in the collective value of administering a statewide assessment program; using transparent and reliable accountability measures to identify schools in need of improvement; deploying high-quality, rigorous, and responsive supports; and transparent public reporting. Throughout the pandemic, NYSED has upheld the principles of DEI and cultural responsiveness by providing amplified supports to schools, continually expanding the number and type of supports provided to identified Comprehensive Support and Improvement (CSI) Schools, Targeted Support and Improvement (TSI) Schools, and Target Districts. Further, the Department anticipates a return to typical administrations of state assessments and reporting of student performance data in the 2021-22 school year.

The Department believes, however, that the timeline and manner for restarting accountability determinations must be addressed differently from other components of the broader accountability and school improvement system. NYSED has maintained that accountability “turn off” and “turn on” must be considered like two different types of light switches. While the Department has been able to turn off accountability systems focused

³ <https://www.regents.nysed.gov/common/regents/files/521bra7.pdf>

⁴ [dcl-assessments-and-acct-022221.pdf \(ed.gov\)](#)

on school identification like a traditional light switch, restarting the system can only be done appropriately using a dimmer switch model to gradually return to pre-pandemic accountability practices.

When considering restart efforts, many educational experts believe, as does NYSED, that equity must be a top priority in restarting accountability systems in the 2021-22 school year. For example, Nathan Dadey, Senior Associate at the Center for Assessment, suggests that:

If states are able to complete achievement testing, they must consider that this disparate impact may be reflected in subgroup performance. One equity-minded response would be to seek a waiver for school identification and in place of those identifications and associated supports, provide supports aimed at helping students who are most likely to be negatively impacted by school closure to catch up and keep up.⁵

Considerations for Re-Starting Accountability Determinations in New York State

Within the context of the new DEI policy and available flexibilities provided by USDE, NYSED is compelled to analyze whether reliable and accurate accountability determinations that support student academic success, including growth and achievement, can be made in the current year and whether such determinations are appropriate.

Even while underscoring the value of state assessments and accountability in promoting equity efforts, USDE recognized in its February 22, 2021 memo⁶ that, “Schools and school districts may face circumstances in which they are not able to safely administer statewide summative assessments this spring using their standard practices.” In addition to not compelling students learning remotely to be brought to school solely for the purpose of taking a state assessment, USDE identified several flexibilities in the administration of statewide assessments, several of which NYSED implemented. These included administering a shortened version of required statewide assessments and extending the testing window to the greatest extent practicable. In the same communication, USDE noted that, “the intent of these flexibilities . . . is to focus on assessments to provide information to parents, educators, and the public about student performance and to help target resources and supports.” USDE subsequently affirmed the appropriate uses of the results from the 2020-21 school year through its approval of New York State’s 2020-21 school year accountability waivers⁷. Specifically, the June 9, 2021 letter from the Deputy Assistant Secretary for Policy and Programs Delegated the Authority to Perform the Functions and Duties of the Assistant Secretary in the Office of

⁵<https://www.nciea.org/blog/covid-19-response/considering-equity-within-accountability-systems-response-interruptions>

⁶ [dcl-assessments-and-acct-022221.pdf](https://www2.ed.gov/policy/elsec/guid/stateletters/dcl-assessments-and-acct-022221.pdf) (ed.gov)<https://www2.ed.gov/policy/elsec/guid/stateletters/dcl-assessments-and-acct-022221.pdf>

⁷ <http://www.nysed.gov/memo/accountability/united-states-department-education-usde-waiver-every-student-succeeds-act-essa>

Elementary and Secondary Education granting NYSED’s previous accountability waiver encouraged State Education Agencies, Local Educational Agencies (LEAs), and schools to, “consider steps to further reduce the stakes of assessments from 2020-21.”⁸

Under ESSA, New York State’s system for annually meaningfully differentiating a subgroup’s performance is based on the following measures: Academic Achievement; Student Growth; Graduation Rate; Academic Progress; English Language Proficiency (ELP); Chronic Absenteeism; and College, Career, and Civic Readiness (CCCR). The use of current year data in combination with immediate prior year data is integral to the way in which subgroup performance is determined on each of the measures listed above. Firstly, all the measures use prior year data as necessary to ensure as many subgroups as possible are included in the ESSA accountability system. Secondly, the Student Growth and ELP measures require immediate prior data to measure student growth attributable to a student’s school. Additionally, to ensure stability of data, the Student Growth measure is computed using a subgroup’s Student Growth Percentile (SGP) from the current year and the immediate two prior years. Finally, the Academic Progress, Graduation Rate, Chronic Absenteeism, and CCCR measures compare subgroup performance to pre-set Measures of Interim Progress (MIP) targets and include a mechanism by which current year performance is compared to prior year performance to determine whether a subgroup should be credited with meeting Safe Harbor or Accelerated Growth targets.

New York State’s accountability system for differentiating school performance using state assessment data is essentially a “three legged-stool” comprised of achievement, progress, and growth results. If New York State cannot **meaningfully** differentiate school performance by using 2021-22 school year data in combination with 2020-21 school year data or 2018-19 school year data, the remaining option is to attempt to determine school performance with a limited, “one-legged” approach using just 2021-22 school year data. With that in mind, NYSED has conducted substantial modeling to consider the following accountability re-start options:

1. Make accountability determinations using 2021-22 school year data with 2020-21 school year as the prior year.
2. Make accountability determinations using 2021-22 school year data with 2018-19 school year as the prior year.
3. Make accountability determinations using only 2021-22 school year data.
4. Delay making accountability determinations until 2022-23 school year data is available and instead focus on providing more rigorous supports to more schools and districts during the 2021-22 school year.

After consulting extensively with experts in assessment and accountability and with stakeholders throughout New York State,⁹ NYSED strongly believes that making accountability determinations using 2021-22 school year data alone, or in combination with data from the 2018-19 school year or 2020-21 school year, would dramatically

⁸ <https://oese.ed.gov/files/2021/06/NY-Accountability-waiver-Response.pdf>

⁹ <http://www.nysed.gov/accountability/accountability-waiver-public-survey>

undermine confidence in the accountability system and hinder New York State's DEI goals to improve academic outcomes and to promote equitable learning environments. The accountability system would be considered biased against schools that educate student populations with the most challenges, regardless of how much progress and growth is achieved. Additionally, to build and maintain public confidence in the accountability system, NYSED believes it is essential that it be fully transparent and readily understood by stakeholders and the public. The complexity associated with using and explaining these options is antithetical to that policy goal. Therefore, due to the specific concerns detailed below, the Department is seeking a waiver from the requirements to identify CSI Schools, TSI Schools, ATSI Schools, and Target Districts based on 2021-22 school year results.

In addition to delaying accountability determinations until the 2022-23 school year, NYSED is seeking flexibility from the limitations in Section 1003(b)(1)(a) that permit Title I School Improvement Funds only to be used for grants to local educational agencies to serve schools implementing Comprehensive Support and Improvement activities or Targeted Support and Improvement activities. NYSED is seeking the ability to use School Improvement funds to support schools in Good Standing that were previously identified as being at risk of becoming identified as a Targeted Support and Improvement School prior to the pandemic, but for which that identification may have been delayed due to pandemic-related interruptions to the accountability system.

Concerns Regarding Making Accountability Determinations Using 2021-22 School Year Data With 2020-21 School Year as the Prior Year

The COVID-19 pandemic disrupted every aspect of learning in New York during the 2019-20 and 2020-21 school years, including the administration of required state assessments of student achievement. For states like New York that use multiple years of prior data to calculate indicators (e.g., student growth), numerous experts have urged extreme caution when combining prior and current year data. Chris Domaleski, Associate Director at the Center for Assessment, suggests that it is preemptive to restart accountability systems based on data from pandemic-affected school years:

Even states that desire to move aggressively will likely need significant time after the 2020-21 academic year to analyze data and confer with policymakers and technical advisors to inform their decisions. The point is, asking states to quickly return their systems to the status quo is not a reasonable goal.¹⁰

Scott Marion, Executive Director at the Center for Assessment, also expresses that experts are concerned that the data from the 2020-21 school year will be neither complete nor comparable: "Every one of them is nervous about the validity of the results... You can pretend it's comparable, but it's not going to be comparable."¹¹ Sean Reardon, Professor of Poverty and Inequality in Education and Professor (by courtesy) of Sociology at Stanford University and developer of the Stanford Education Data Archive (SEDA), which

¹⁰ <https://www.nciea.org/blog/essa/outlook-essa-school-accountability-after-covid-19>

¹¹ <https://www.chalkbeat.org/2021/2/24/22299804/schools-testing-covid-results-accuracy>

measures educational opportunity, average test score performance, academic achievement gaps, and other information for public schools throughout the country, states that testing in 2021 is very limited:

If you had a random sample of kids [in the testing pool], then that would be fine...but testing in 2021 wasn't random. Kids and families chose whether they took the test. Unless you have a lot of information to support a claim of comparability, I think the default assumption for 2021 is that they're not comparable [to 2019 test scores]. I wouldn't draw too many conclusions based on them and I'd use a lot of caveats.¹²

Concerns about comparability are spotlighted in recently released rates of participation on the grades 3-8 assessments in math and ELA. As a result of NYSED implementing flexibilities provided by USDE regarding the administration of assessments during the pandemic,¹³ a significant number of students that received hybrid instruction or entirely remote instruction did not participate in Spring 2021 assessments for grades 3-8. Assessment results for the 2020-21 school year indicate approximately 40% of students statewide participated in elementary and middle level state assessments in ELA and mathematics, which is significantly less than half of the participation rate for the 2018-19 school year. Participation rates varied significantly among subgroups. Students of color, students with disabilities (SWD), English language learners (ELL), and economically disadvantaged students were much less likely to participate in state assessments compared to the "All Students" subgroup. Attachment A shows the 2020-21 school year participation rates by subgroup for grade 3-8 ELA and math, by grade level and by Need Resource Category (NRC).¹⁴

These low participation rates significantly undermine the use of 2020-21 school year results as prior year data because the ESSA accountability system requires that all students in the tested grades be assessed annually and when calculating the Academic Achievement indicator, the denominator be based on the number of students assessed in ELA and mathematics or 95% of the student population, whichever is greater.¹⁵ Experts like Marianne Perie, President of Measurement in Practice and former Director of The Achievement and Assessment Institute's Center for Educational Testing and Evaluation advises that, "participation rates below 50 percent would make it tough to draw any meaningful conclusions from test results."¹⁶

Of specific concern, there were fewer students participating in 2020-21 school year assessments in higher grades compared to lower grades. NYSED has also identified significantly lower participation in some of our larger urban and suburban areas, and higher rates of participation in rural areas. Because New York has a system that

¹² <https://www.edweek.org/teaching-learning/state-test-results-are-in-are-they-useless/2021/10>

¹³ <https://www2.ed.gov/policy/elsec/guid/stateletters/dcl-assessments-and-acct-022221.pdf>

¹⁴ The New Resource Category is a measure of a district's ability to meet the needs of its students with local resources. The Need/Resource Capacity (N/RC) categories are determined using the definitions found here: <http://www.p12.nysed.gov/irs/accountability/2011-12/NeedResourceCapacityIndex.pdf>.

¹⁵ <https://oese.ed.gov/files/2020/03/COVID-19-OESE-FINAL-3.12.20.pdf>

¹⁶ <https://www.edweek.org/teaching-learning/state-test-results-are-in-are-they-useless/2021/10>

establishes the same standards for elementary and middle schools, the low participation rates in middle schools will skew accountability determinations toward those schools whose enrollment primarily consists of students in the upper grades. Significant differences in participation rates by subgroup present compounding concerns as to whether an annual meaningful differentiation can be made using 2021-22 school year data. Accountability determinations based on incomplete and non-representative data would undermine confidence in the accountability system, have significantly negative effects on schools and would not uphold the following standards identified by the American Educational Research Association, the American Psychological Association, and the National Council on Measurement in Education's publication titled, *Standards for Educational and Psychological Testing*.¹⁷

- Standard 3.6: Where credible evidence indicates that test scores may differ in meaning for relevant subgroups in the intended examinee population, test developers and/or users are responsible for examining the evidence for validity of score interpretations for intended uses for individuals from those subgroups. What constitutes a significant difference in subgroup scores and what actions are taken in response to such differences may be defined by applicable laws.
- Standard 13.5: Those responsible for the development and use of tests for evaluation or accountability purposes should take steps to promote accurate interpretations and appropriate uses for all groups for which results will be applied.
- Standard 13.7: When tests are selected for use in evaluation or accountability settings, the ways in which the test results are intended to be used, and the consequences they are expected to promote, should be clearly described, along with cautions against inappropriate uses.
- Standard 13.8: Those who mandate the use of tests in policy, evaluation, and accountability contexts and those who use tests in such contexts should monitor their impact and should identify and minimize negative consequences.

NYSED's system for making differentiated identifications of schools and districts is intended to yield equitable, effective, and fair determinations that offer schools with accurate insights into both areas of growth and need for improvement. The extent of missing data and the unevenness of the available data makes it highly unlikely, if not impossible to make equitable, effective, and fair accountability determinations in the 20-21 school year. This reality underscores that the right course is to provide New York State schools with resources and tools to continue their recovery efforts, not proceed with formal accountability determinations.

Low participation rates have also generated concerns affecting the high school accountability cohort system under New York's ESSA plan.¹⁸ As a result of NYSED implementing flexibilities regarding the administration of state assessments during the pandemic,¹⁹ a sizable number of students who were learning in a hybrid or entirely remote setting also did not participate in assessments at the high school level. Students who

¹⁷ <https://www.testingstandards.net/uploads/7/6/6/4/76643089/9780935302356.pdf>

¹⁸ <http://www.nysed.gov/common/nysed/files/programs/accountability/2020-21-haw-092721-updated.pdf>

¹⁹ [dcl-assessments-and-acct-022221.pdf \(ed.gov\)](#)

otherwise would have taken Regents Examinations were exempted from multiple administrations of the exams during the 2019-20 and 2020-21 school years.²⁰ All students in the 2018 Cohort were exempted from the ELA Regents Examination, which is typically taken during grade 11 if they intended to take the exam in the 2019-20 or the 2020-21 school years. Consequently, the exempted students do not have a Regents score that can be included in the state's performance index calculation, thus affecting the computation of Composite Performance and Academic Progress. Moreover, uneven cohort participation in Regents Examinations skew the cohort's performance based on participation and exemptions. Attachment B shows the percentage of students in the 2017 Cohort who have scores for the Regents Examinations from the 2020-21 school year used for Composite Performance. Since New York State uses a ranking method to identify the bottom 10% of schools for performance, schools with greater proportions of missing data are more likely to be included in the bottom 10% without an equitable methodology for incorporating exemptions into a modified calculation of Composite Performance. Additionally, due to the exemptions, students also missed the opportunity to improve upon a lower Regents score by retaking the exam.

The Department is also concerned that accountability measurements involving 2020-21 school year Chronic Absenteeism will result in misidentifying or not holding accountable a significant percentage of subgroups. When developing its ESSA State Plan, New York State used 2016-17 school year data as the baseline to set long-term goals and MIPs for each school by subgroup. Data from the 2020-21 school year indicate that schools with high Black and Hispanic populations had lower attendance. Due to the anticipated increase in Chronic Absenteeism, NYSED expects that most schools will not meet their 2021-22 school year MIPs, which will make schools fall behind their required targets.

Concerns Regarding Making Accountability Determinations Using 2021-22 School Year Data With 2018-19 School Year as the Prior Year

Without the ability to confidently use 2020-21 school year results, the Department would need to amend its approved ESSA State Plan to use pre-pandemic data from the 2018-19 school year and earlier as prior year data. Such an approach would significantly compromise the Department's ability to provide schools and districts with current, meaningful growth determinations. For example, as previously stated, New York State's elementary and middle school growth measure is based on SGPs computed for the current school year as well as the prior two school years. For the 2021-22 school year, growth calculations would include SGPs computed based upon equally weighted growth data from 2016-17 to 2017-18, 2017-18 to 2018-19, and 2020-21 to 2021-22 school years. Therefore, NYSED would only be able to implement a limited version of its accountability system that would be based primarily on 2021-22 school year academic achievement, since no state tests in grades 3-8 were administered in the 2019-20 school year, and 2020-21 school year data are not a reliable baseline for measuring student

²⁰ <http://www.p12.nysed.gov/assessment/hsgen/2021/memo-june-august-2021-assessments.pdf#:~:text=Students%20enrolled%20in%20NYSED%20approved%20CTE%20programs%20culminating,for%20the%20purposes%20of%20earning%20an%20industry%20certification.>

growth. In addition, 2018-19 school year data will, in many instances, no longer be reflective of the performance of students in recent years and would be inappropriate to combine with 2021-22 school year data to meet current year n-size requirements. Similarly, it would be inappropriate to use 2018-19 school year data to measure annual progress of schools or make determinations whether schools should be credited with achieving safe harbor targets or making accelerated growth. Such an approach would overly rely on pre-pandemic assessment data and is not likely to accurately reflect the current learning needs of students.

Concerns Regarding Making Accountability Determinations Using Only 2021-22 School Year Data

Using 2021-22 school year results alone will result in a significantly lower proportion of subgroups that can be included in school and district-level accountability determinations due to small N-size rules being adjusted to set-aside the 2-year combination rule. Based upon modeling using 2018-19 school year data, NYSED expects fewer than 56% of the SWD subgroup to be included at the elementary/middle level using single year data compared to 96% when 2 years of data are used. For the Black and Hispanic subgroups, fewer than 61% will be included in determinations at the elementary/middle level compared to 72% when 2 years of data are used. Historically, over 20% of Black and Hispanic subgroups were included at schools identified for TSI status. By using single year data, many of these subgroups will not have a large enough N-size to be included in new accountability determinations, nor will previously identified subgroups be able to show progress. Attachment C reflects the low percentage of subgroups accountable using single-year data. Attachment D shows the participation rate by subgroup from the 2018-19 school year compared to the 2020-21 school year for elementary and middle school level students.

The 2021-22 school year student performance data will mostly reflect the performance of a school's larger subgroups without the 2-year combination rule. Many schools with at-risk subgroups such as SWD, ELL, Black, and Hispanic subgroups will not have a Composite Level for those subgroups and, therefore, will not be accountable. Additionally, other accountability metrics like Safe Harbor and Accelerated Growth cannot be calculated, which would affect Academic Progress, Chronic Absenteeism Rate, Graduation Rate, and CCCR. Resuming the accountability system with these significant calculation limitations would prevent meaningful differentiation, especially given the challenges of accurately measuring performance for the most vulnerable subgroups of students. Such an approach to restarting the identification component of the ESSA accountability system will result in a shift backwards toward identification patterns under No Child Left Behind which concentrated identifications of schools in need of improvement in larger urban districts with higher percentages of economically disadvantaged students and students of color. This "one-legged" approach to accountability, in which the entire focus is on academic achievement while progress and growth are ignored, will result in the identification of schools that are, in fact, improving. Consequently, community support for the strategies that schools are using to achieve more equitable student outcomes may be undermined.

Based on modeling, NYSED strongly believes that using 2021-22 school year data to make accountability determinations will bias the process towards identification of schools with high concentrations of traditionally underserved communities rather than on those schools where students are showing the lowest growth in achievement. Such identifications would undermine years of effort by the Department to develop, implement, and communicate an ESSA accountability system that is not about punishing or shaming schools and districts, but is instead a system designed for supporting schools that do least well at promoting student growth in learning.

Benefits of Delaying Accountability Determinations until 2022-23 School Year

Obtaining a waiver of the requirements detailed in Sections 1111(c)(4) and 1111(d)(2)(C)-(D) in the 2021-22 school year is the most appropriate course of action for New York State's re-start of its accountability system – both from a technical perspective and from an advancement of equity perspective. Preliminary feedback received from a wide variety of stakeholders, including parents, students, superintendents, principals, teachers, school support staff, other district personnel, and members of the community, document that such an approach would be welcomed by stakeholders. Throughout New York State, educators and students are still facing significant challenges and struggles in seeking a return to normalcy. Those stressors are manifest in reports of widespread student behavioral issues, increased need for mental health and academic interventions and difficulties in recruiting and retaining school personnel. It is critical that the Department mitigate rather than exacerbate stress on fragile communities that need time to recover and heal from the pandemic. The risk of marginalizing both stakeholders and subgroups of students by making premature determinations is a significant concern. By removing the additional stressor of having academic performance and growth inaccurately identified through premature and invalid accountability determinations, the Department will be better positioned to partner with and support schools and districts that most need assistance.

Benefits of Focusing on Providing More Rigorous Supports to More Schools and Districts During 2021-22 School Year

Educational experts agree that local and state leaders need to intensify supports in the 2021-22 school year as schools are in a critical time of recuperation. The Center for School and Student Progress asserts in their research findings on COVID-19's impact on learning outcomes in ELA and math for the 2020-21 school year that affected communities need to be prioritized:

As daily life increasingly returns to 'normal,' we must confront what this means in the context of education...next year [2021-22] cannot be a 'normal' year. We cannot return to the classroom and do things the same as they have always been done and expect to see a different outcome. Instead, we must use this critical moment in education to radically rethink how programs, policies, and opportunities

are designed and fiercely commit to prioritizing the communities most impacted by the pandemic and distributing resources accordingly.²¹

Restarting the accountability system prematurely based on 2021-22 school year results will hinder, if not preclude that much-needed rethinking. During numerous conversations with stakeholders across New York State, district leaders, school leaders and classroom teachers have noted feeling compelled to divert their attention away from engaging in critical social-emotional learning (SEL) work to focus on ELA and math assessment preparation more narrowly, which may, in the longer term, reduce student achievement and growth. At the local level, waiving the requirements in ESSA Sections 1111(c)(4) and 1111(d)(2)(C)-(D) for the 2021-22 school year will allow all school communities with needed flexibilities to identify student needs using more reliable measures of growth and progress during pandemic-impacted years and to intensify the socio-emotional development supports, services, and opportunities that students need to achieve academic growth and, while still maintaining high expectations for achievement.

At the state level, this needed intensification of supports in the 2021-22 school year – particularly in those schools already identified under previous accountability determinations – is consistent with the model NYSED has already deployed throughout the 2019-20, 2020-21, and 2021-22 school years. While the identification component of the accountability system was turned off in the 2019-20 school year and again in the 2020-21 school year, the support component of our system has continued to grow in both years based on interest from the field and interest from the Department to move in a more service and support -oriented direction.

NYSED has required the completion of improvement plans and maintained ongoing support for 215 previously identified districts and 487 previously identified schools. In addition to reviewing multiple sources of recent data, such as annual survey results, assessment data, and attendance data, the schools have also been required to look closely at student interviews and the “Equity Self-Reflection for Identified Schools”²² to examine how they are creating an equitable learning environment in which all students experience dignity, a sense of belonging, and inclusion. Providing LEAs with the time to focus on these efforts to reach their goals, with support from NYSED staff, is the most logical and equitable way to support student success.

In addition to the universal level of support offered to identified schools, NYSED believes it is important for schools and districts to have agency when taking ownership of their improvement, and as a result, the Department has been offering optional additional support to our CSI Schools. For example, for the past three years, nearly two-thirds of our Receivership CSI Schools have participated in the optional support offered by NYSED through the Targeted Support program that combines additional funding with additional technical assistance and individualized principal coaching. Through this model, more

²¹ <https://www.nwea.org/content/uploads/2021/07/Learning-during-COVID-19-Reading-and-math-achievement-in-the-2020-2021-school-year.research-brief-1.pdf>

²² <http://www.nysed.gov/accountability/needs-assessment>

than two dozen schools have received a combined total of more than 1200 hours of specialized coaching since January 2020.

NYSED supports to non-ReceiverShip CSI Schools have also continued to intensify during the pandemic through our CSI Enhanced program. Over the past three years, these schools have been offered the opportunity to participate in one of the additional supports provided by NYSED to advance improvement in their school. When these supplemental options were first introduced in 2019, NYSED offered three Enhanced Options to non-ReceiverShip schools, and 43% of the schools participated. The Department added two new additional support options in the 2020-21 school year and will be offering three additional options for the 2021-22 school year, so that there are now eight options from which schools may choose. As of the time of this waiver request, 164 CSI Schools (approximately 85% of the non-ReceiverShip CSI Schools statewide) have opted into one of these additional models of support during the 2021-22 school year. Further, NYSED has recently launched two new communities of practice. The first community will facilitate conversations among Assistant Superintendents, Directors of Curriculum and Instruction and others from all 215 Target Districts statewide about pandemic responsive improvement strategies to address student needs. The second community will facilitate peer-to-peer conversations among school-based staff from all 487 CSI and TSI Schools focused on Addressing Chronic Absenteeism.

Under the DEI Framework, waiving the limitations of Section 1003(b)(1)(a) directing Title I School Improvement funds only to identified CSI and TSI Schools is consistent with the intensification of supports model we have employed. This will enable creation of an additional cohort of nearly 350 schools at risk of identification for improvement pre-pandemic to access resources can be utilized to meet differentiated needs. It is important to note that providing funds to non-identified schools can be accomplished without any diminution of services to currently identified schools because these funds had previously been earmarked to be used to support newly identified schools in the 2019-20 and 2020-21 school years. Many of these schools would have received these funds had accountability determinations been able to be made in the past two years.

For these “pre-identified” schools, NYSED will provide fiscal resources and programmatic supports not currently available because the schools are not formally identified under the ESSA accountability system. Expanding the cohort of schools supported with dedicated Title I School Improvement funds and activities, including optional use of improvement plan templates and processes, while maintaining ongoing support for previously identified districts and schools directly addresses past and emerging equity gaps and student needs. In addition to supporting the review of multiple sources of recent data, such as annual survey results, assessment data, and attendance data, the additional schools to be served will have access to tools and resources that support the incorporation of student voice via student interview protocols and the “Equity Self-Reflection for Identified Schools”²³ to examine how they are creating an equitable learning environment in which all students experience dignity, a sense of belonging, and

²³ <http://www.nysed.gov/accountability/needs-assessment>

inclusion. Providing LEAs with the time to focus on these proactive and preventive efforts to reach their goals is the most effective and equitable way to advance student success in the immediate post pandemic era.

D. Describe the methods the State educational agency, local educational agency, school, or Indian tribe will use the monitor and regularly evaluate the effectiveness of the implementation of the plan.

NYSED will maintain its focus on providing high-quality support to 487 CSI Schools, TSI Schools, and ATSI Schools, and 215 Target Districts. NYSED will expand most of the supports that existed prior to the COVID-19 pandemic in the following ways:

- Supply optional supports to schools to ensure that they are supported throughout the school year to minimize the likelihood of reidentification, such as consulting, on-site technical assistance, and virtual support.
- Require previously identified districts and schools to develop annual improvement plans and receive both fiscal assistance and technical assistance on implementing their improvement strategies.
- Continue the Department's Office of Innovation and School Reform established progress reporting and management process for 38 Receivership/CSI Schools for the 2021-22 school year. This process consists of regularly submitted progress reports, performance review calls, and site visit monitoring (with virtual visits taking place until in-person site visits are once again possible).
- Require Receivership Schools to engage in ongoing monitoring of established Demonstrable Improvement indicators.
- Require all 228 CSI Schools to submit their improvement plans to NYSED for approval. Prior to this, the Department's Office of Accountability staff will work closely with principals of CSI Schools to support their development of the improvement plan. After the plan is approved, the Department partners with the CSI Schools throughout the school year to provide technical assistance on the implementation of the improvement plan.²⁴
- Increase enhanced support models from five to eight and continue to make them available to 190 identified non-Receiverhip CSI Schools. Some examples of the enhanced support models are, "Advancing Equity," "Developing Restorative Practitioners," "Extending Digital Learning," "Supporting New CSI Principals," and "Enhancing Principal Leadership."²⁵
- Provide support to new TSI School principals via a cohort coaching model while overseeing district support for ATSI and TSI Schools.
- Use a consolidated application process to monitor for fiscal responsibility and follow-up on improvement goals for schools and districts receiving Title I funds.

²⁴ <http://www.nysed.gov/common/nysed/files/programs/essa/nys-essa-plan.pdf>

²⁵ <http://www.nysed.gov/accountability/school-support>

- Provide technical assistance to improve results for identified subgroups of students with disabilities and distribute Section 611 and 619 grants under Individuals with Disabilities Education Act (IDEA)-American Rescue Plan (ARP).²⁶

In addition to a focus on high-quality support, NYSED will also continue and expand its collection and communication of available student data. NYSED has a robust data collection and reporting system that will be leveraged to provide parents, school and district leaders, and the public with available data on how students are achieving and progressing. This data system is not limited to test result data and includes detailed information about student enrollment, attendance, access to technology resources, course completion, graduation results as well as school climate.²⁷ Additionally, NYSED will continue to require LEAs to report student achievement as well as other important school-level data. Collection of these data elements will directly support NYSED's ongoing efforts to better understand the pandemic's impact on school communities and identify appropriate actions to meet the academic, social-emotional, and physical health and safety needs of students.

E. Include only information directly related to the waiver request.

Section 8401(b)(3)(A) requires the New York State Education Department to: (1) provide the public and any interested local educational agency in the State with notice and a reasonable opportunity to comment and provide input on the request, to the extent that the request impacts the local educational agency; (2) submit the comments and input to the Secretary, with a description of how the State addressed the comments and input; and (3) provide notice and a reasonable time to comment to the public and local educational agencies in the manner in which the applying agency customarily provides similar notice and opportunity to comment to the public. The New York State Education Department has fulfilled this requirement by:

- Providing notice and information to the public to inform the Department's consideration of submitting a waiver request to USDE related to making school and district accountability determinations based on results from the 2021-22 school year on its website at: <http://www.nysed.gov/accountability/accountability-waiver-public-survey>. In accordance with normal procedures of the Department, the public was provided with ten (10) business days to provide responses to the survey.
- Providing notice and information to the public regarding this request for a waiver on its website at: <http://www.nysed.gov/essa/assessment-and-accountability-waivers>. In accordance with normal procedures of the Department, the public was provided with ten (10) business days to provide formal written comments.
- Distributing notification of the waiver request and solicitation of comments via email to all district superintendents, school superintendents, charter school officials, and nonpublic school representatives. In accordance with normal procedures of the

²⁶ <http://www.p12.nysed.gov/specialed/finance/2021-23-idea-arp-grant/application-instruction-memo.html>

²⁷ <http://www.nysed.gov/memo/information-reporting-services/digital-equity-survey-data-collection-and-reporting-sirs>

Department, LEA representatives were provided with ten (10) business days to provide comments.

- Distributing notification of the waiver request and solicitation of comments via email to the State's Title I Committee of Practitioners. In accordance with normal procedures of the Department, members of the Committee of Practitioners were provided with ten (10) business days to provide comments.

The initial survey issued on November 4, 2021 seeking stakeholder input on a potential waiver request to USDE generated 3,888 responses from stakeholders. The survey results were overwhelmingly supportive of the Department submitting a waiver request. More than 90.5% of respondents indicated that NYSED should not use 2021-22 results to make accountability determinations. Among the survey responses received:

- 54.9% of respondents indicated that NYSED should neither report the performance of schools on ESSA accountability indicators using results from the 2021-22 school year nor use the results to make accountability determinations.
- 35.6% of respondents indicated that NYSED should report the performance of schools on ESSA accountability indicators using results from the 2021-22 school year for informational and planning purposes, but not use the results to make accountability determinations.
- Only 8% of respondents indicated that NYSED should report the performance of schools on ESSA accountability indicators using results from the 2021-22 school year and use the results to make accountability determinations.

In addition to the interest survey, the Department invited the public to share opinions regarding the waiver request by submitting formal written comments during the period of December 1, 2021 through December 15, 2021. By the close of the ten-day public comment period, the Department received 3,931 responses indicating their degree of support for the waiver. Additionally, the Department received 1,270 comments and several letters from stakeholders, including individuals and organizations. Similar to the initial interest survey, the degree of support and the public comments were overwhelmingly supportive of the Department's proposed waiver requests related to accountability determinations and the use of Title I School Improvement funds. Among respondents:

- 81.2% of respondents supported or strongly supported the Department's proposed waiver requests.
- Only 16.2% of respondents opposed or strongly opposed the proposed waivers.
- 2.4% of respondents indicated they neither supported or opposed the waiver or had no opinion about the waiver.

Attachment E shows evidence of public postings and email communications by NYSED. Attachment F shows data from the interest survey and all public comments received.

F. Describe how schools will continue to provide assistance to the same populations served by programs for which waivers are requested and, if the waiver relates to provisions of subsections (b) or (h) of section 1111, describe how the State educational agency, local educational agency, school, or Indian tribe will maintain or improve transparency in reporting to parents and the public on student achievement and school performance, including the achievement of the subgroups of students identified in section 1111(b)(2)(B)(xi).

As described above, the requested waiver will allow all school communities with the time and focus needed to identify student needs, including the needs of students with disabilities, English Language Learners, and economically disadvantaged students, using more reliable measures of growth and progress during pandemic-impacted years and to intensify the supports, services, and opportunities that students need to achieve academic growth and socio-emotional development, while still maintaining high expectations for achievement. LEAs will receive continual supports with efforts to increase accessibility to academic and mental health services to students with high needs. The Department will continue to engage with LEAs and community stakeholders to track progress in areas of academic performance, attendance and initiatives related to student engagement. LEAs will have access to information and resources, such as the school report card and professional development tools, on the NYSED website.

Should you have any questions or need additional information, please feel free to contact me directly at commissioner@nysed.gov. We look forward to your prompt and favorable response to New York's waiver requests.

Sincerely,



Betty A. Rosa
Commissioner

ATTACHMENT A. Participation Rates by Subgroup for Grade Levels 3-8

Table 1: 2020-21 School Year Grades 3-8 Participation Rate by Subgroup and Subject

Subgroup	Enrolled	% ELA Tested	% Math Tested
All Students	1,195,169	42%	40%
SWD	251,796	29%	28%
Native American	8,354	33%	31%
Asian	117,565	43%	40%
Black	196,603	27%	25%
Hispanic	341,880	30%	29%
White	491,552	56%	53%
ELL	109,126	33%	34%
Economically Disadvantaged	683,643	35%	34%

Table 2: 2020-21 School Year Participation Rate by Grade

Subject	% ELA Tested	% Math Tested
Grade 3	48%	49%
Grade 4	48%	48%
Grade 5	45%	45%
Grade 6	41%	41%
Grade 7	38%	37%
Grade 8	33%	21%
Grades 3-8	40%	31%

Table 3: 2020-21 School Year Grades 3-8 Participation Rates by Need Resource Categories (NRC)

NRC Category	% ELA Tested	% Math Tested
Large Cities	38%	38%
Urban-Suburban	48%	47%
Average Needs	57%	54%
Low Needs	58%	53%
Rural	74%	72%
Charter	26%	25%

ATTACHMENT B. Students in the 2017 Cohort with Four Regents Examinations from the 2020-21 School Year

2017 Cohort - 4 Year Outcome					
Subgroup	Cohort Count	ELA Regents Tested	Math Regents Tested	Science Regents Tested	Soc. Studies Regents Tested
All	208,217	48%	83%	80%	77%
SWD	37,194	29%	54%	52%	50%
Nat. Amer.	1,506	49%	77%	73%	69%
Asian	20,391	64%	91%	86%	86%
Black	34,899	50%	73%	66%	64%
Hispanic	53,726	48%	73%	68%	66%
White	93,421	43%	90%	90%	87%
Multiracial	4,274	46%	82%	81%	76%
ELL	13,793	11%	43%	26%	32%
ED	108,306	48%	77%	72%	69%

ATTACHMENT C. Percentage of Subgroups Accountable Based on Single Year Data (2018-19 School Year)

Subgroup	Elementary-Middle Level Measures					High School Level Measures					
	Composite	Growth	ELP	Academic Progress	Chronic Absenteeism	Composite	Graduation Rate	ELP	Academic Progress	Chronic Absenteeism	CCCR
All Students	98.7	0	0	96.6	92.9	92.1	86.7	0	89.6	92.1	92.1
SWD	55.8	0	0	55.2	11.4	23.3	18.1	0	23.2	23.3	23.1
Native American	15.1	0	0	15.1	2.4	7.1	1.8	0	7.1	7.1	7.1
Asian	40.8	0	0	40.5	16.9	25.1	20.5	0	25.1	25.1	25.1
Black	59.1	0	0	57.7	28.5	42.8	35.3	0	40.5	42.8	42.6
Hispanic	62.2	0	0	60.8	33.6	50.7	43.6	0	49.7	50.7	50.6
White	80.9	0	0	80.2	61.7	70.3	67.7	0	70.1	70.3	70.3
ELL	44.2	0	0	43.1	18.5	23.4	15.4	0	21.2	23.4	23.4
Economically Disadvantaged	87.5	0	0	85.5	61.8	75.3	66.5	0	72.9	75.3	75.3
Multiracial	9.5	0	0	9.4	0.4	2.8	0	0	2.3	2.8	2.8


ATTACHMENT D. Participation (Part.) Rate by Subgroup in the 2018-19 School Year and 2020-21 School Year for Elementary and Middle School Level Students

Subgroups	2018-19 Weighted Average Achievement Index	2020-21 Part. Rate	Estimated Weighted Average Achievement Index based on 10% decline in Part. Rate (Base: 2018-19)	Estimated decline in Weighted Average Achievement Index points based on 10% decline in Part. Rate	Estimated Weighted Average Achievement Index based on 2020-21 Part. Rate (Base: 2018-19)
All Students	123.1	40.9	102.8	20.3	58.0
SWD	64.3	28.5	52.8	11.5	23.7
Native American	119.2	32.0	100.5	18.7	40.8
Asian	186.1	41.8	158.3	27.8	77.2
Black	108.3	26.0	91.5	16.8	29.5
Hispanic	108.1	29.7	90.9	17.2	35.1
White	124.6	54.1	102.4	22.2	86.6
ELL	97	33.3	81.9	15.1	34.0
Economically Disadvantaged	110.8	34.3	93.3	17.5	41.2
Multiracial	115.6	NA	95.2	20.4	N/A

ATTACHMENT E. Evidence of Public Postings and Email Communications by NYSED

NYSED Accountability Waiver Public Interest Survey

<http://www.nysed.gov/accountability/accountability-waiver-public-survey>

 Accountability

Office of Accountability

About Us

Contact Us

Accountability Waiver Public Survey

November 4, 2021:

The New York State Education Department (NYSED) is seeking stakeholder input on a potential waiver request to the United States Department of Education (USDE) related to making school and district accountability determinations based on results from the 2021-22 school year under the Every Student Succeeds Act (ESSA).

NYSED is accepting responses to the survey through 5:00p.m. EST on Friday, November 19, 2021. The survey results will be valuable in the development of a possible waiver. If the Department moves forward with a potential waiver, that document would be made available approved for public comment and be presented to the Board of Regents prior to submission to USDE.


[The survey can be found here.](#) The survey was created in Microsoft Forms and can be translated into languages other than English with a browser's translator. [Further instructions on how to translate the survey are available here.](#)

The survey will be receiving responses through 5:00p.m. EST on Friday, November 19, 2021.

NYSED ESSA Page Public Comment Posting:

<http://www.nysed.gov/essa/assessment-and-accountability-waivers>

← → ↺ 🏠 ⚠ Not secure | www.nysed.gov/essa/assessment-and-accountability-waivers 📄 ⭐ ⚙ 👤 ...

 Every Student Succeeds Act (ESSA)

≡ Every Student Succeeds Act (ESSA)

New York State ESSA Plan

2021-2022 Consolidated Application for ESSA-Funded Programs

Assessment and Accountability Waivers

Accountability Designation Materials

Allocations, Poverty Data, and Student Counts

Complaint Procedures

Assessment and Accountability Waivers

This page contains information about New York State's Every Student Succeeds Act (ESSA) Assessment and Accountability Waiver Requests that were submitted on Friday, February 12, 2021 to the United States Department of Education (USDE).

December 1, 2021:

The New York State Education Department (NYSED) is accepting public comment on a waiver request to the United States Department of Education (USDE) for additional flexibility related to certain provisions of the federal Every Student Succeeds Act (ESSA) pertaining to identification of schools and districts for improvement using data from the 2021-22 school year and to usage of Title I School Improvement Funds.

[Comments on the waiver proposal may be submitted here.](#) The form for submitting public comments was created using Microsoft Forms and can be translated into languages other than English with a browser's translator. [Further instructions on how to translate the form can be found here.](#) 📄 Comments will be accepted through 5:00p.m. EST on Wednesday, December 15, 2021.


[2021-22 NYSED Accountability and School Identification Waiver Request Letter to USDE](#) 📄

Twitter Public Interest Survey Posting:



NYS Education Department
@NYSEDNews

ICYMI: NYSED is seeking stakeholder input on a potential waiver request to USDE related to making school and district accountability determinations based on results from the 2021-22 school year. Survey responses will be accepted through November 19.
bit.ly/3mKvADJ

A graphic with a textured, light brown background. The text "Stakeholder Input Requested" is centered in a large, bold, black sans-serif font, arranged in three lines.

**Stakeholder
Input
Requested**

10:57 AM · Nov 10, 2021 · Hootsuite Inc.

3 Retweets **1** Like

Twitter Public Comment Posting:



NYS Education Department

@NYSEDNews

Public comments are now being accepted on a proposed waiver request to [@usedgov](#) related to state accountability requirements under [#ESSA](#) and Title I School Improvement Funding. Find out how to share your feedback: bit.ly/31mIP4X

Public Comment Requested

11:29 AM · Dec 1, 2021 · Twitter Web App

6 Retweets 4 Likes



NYS Education Department @NYSEDNews · Dec 1

Replying to [@NYSEDNews](#)

Chnc. Young: "New York's schools continue to feel the impact of the pandemic and the unprecedented circumstances it has caused. We encourage educators, families, students and, indeed, all those with interest in education to provide feedback on this important matter." [#ESSA](#)

1



NYS Education Department @NYSEDNews · Dec 1

Cmsr. Rosa: "The Department is committed to determining the most appropriate timeline and manner for re-starting the ESSA accountability system."

1

1

1



NYS Education Department @NYSEDNews · Dec 1

Cmsr. Rosa: "In a year that tested the resolve and ingenuity of our educators, we continue to work with identified schools to provide support models that encourage growth."

1

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NYS Education Department @NYSEDNews · Dec 1

Cmsr. Rosa: "Stakeholders may rest assured that even if [@usedgov](#) approves a waiver, the critical work to support our schools will continue." [#ESSA](#)

1



NYS Education Department @NYSEDNews · Dec 1

You can read the full waiver and find the link to submit public comment on the NYSED website:



nysed.gov

Proposed Federal Waiver for State Accountability Requirements and School Improvement Funding Now...

LinkedIn Public Comment Posting:

<https://www.linkedin.com/company/new-york-state-education-department>



Facebook Public Comment Posting:

[New York State Education Department](#)

December 1 at 8:30 AM ·

Public comments are now being accepted on a proposed waiver request to the [U.S. Department of Education](#) related to state accountability requirements under the Every Student Succeeds Act (ESSA) and Title I School Improvement Funding, State Education Commissioner Betty A. Rosa announced today. #ESSA

"New York's schools continue to feel the impact of the pandemic and the unprecedented circumstances it has caused," Board of Regents Chancellor Lester W. Young, Jr. said. "We encourage educators, families, students and, indeed, all those with interest in education to provide feedback on this important matter."

"The Department is committed to determining the most appropriate timeline and manner for re-starting the ESSA accountability system," Commissioner Rosa said. "In a year that tested the resolve and ingenuity of our educators, we continue to work with identified schools to provide support models that encourage growth. Stakeholders may rest assured that even if USDE approves a waiver, the critical work to support our schools will continue."

You can read the full waiver and find the link to submit public comment on the NYSED website: <https://bit.ly/31mIP4X>

Public Comment News Release Email Communication from NYSED

From: [Title1-Cops](#)
To: [Title1-Cops](#)
Cc: [Jason Harmon](#); [Erica Meaker](#)
Subject: NEWS RELEASE: PROPOSED FEDERAL WAIVER FOR STATE ACCOUNTABILITY REQUIREMENTS AND SCHOOL IMPROVEMENT FUNDING NOW AVAILABLE FOR PUBLIC COMMENT
Date: Wednesday, December 1, 2021 12:00:47 PM
Attachments: [image002.png](#)
[image003.emz](#)
[image001.png](#)
Importance: High

Good afternoon colleagues,

Please see message below regarding the comment period for a proposed waiver request to the U.S. Department of Education (USDE) related to state accountability requirements under the Every Student Succeeds Act (ESSA) and Title I School Improvement Funding.

Best regards,

Office of Accountability

From: NYSEDCommunications <NYSEDCommunications@nysed.gov>
Sent: Wednesday, December 1, 2021 11:20 AM
To: NYSEDCommunications <NYSEDCommunications@nysed.gov>
Subject: NEWS RELEASE: PROPOSED FEDERAL WAIVER FOR STATE ACCOUNTABILITY REQUIREMENTS AND SCHOOL IMPROVEMENT FUNDING NOW AVAILABLE FOR PUBLIC COMMENT



New York State Board of Regents
Betty A. Rosa
Commissioner of Education
The State Education Department
The University of the State of New York / Albany, NY 12234
Office of Communications

NEWS
FOR IMMEDIATE RELEASE December 1, 2021

Media Contact:
JP O'Hare or Jeanne Beattie

PROPOSED FEDERAL WAIVER FOR STATE ACCOUNTABILITY REQUIREMENTS AND SCHOOL IMPROVEMENT FUNDING NOW AVAILABLE FOR PUBLIC COMMENT

Public Comments Accepted Through December 15

Public comments are now being accepted on a proposed waiver request to the U.S. Department of Education (USDE) related to state accountability requirements under the Every Student Succeeds Act (ESSA) and Title I School Improvement Funding, State Education Commissioner Betty A. Rosa announced today.

“New York’s schools continue to feel the impact of the pandemic and the unprecedented circumstances it has caused,” Board of Regents Chancellor Lester W. Young, Jr. said. “We encourage educators, families, students and, indeed, all those with interest in education to provide feedback on this important matter.”

“The Department is committed to determining the most appropriate timeline and manner for re-starting the ESSA accountability system,” Commissioner Rosa said. “In a year that tested the resolve and ingenuity of our educators, we continue to work with identified schools to provide support models that encourage growth. Stakeholders may rest assured that even if USDE approves a waiver, the critical work to support our schools will continue.”

The New York State Education Department (NYSED) waiver request proposes to eliminate some accountability indicator requirements to identify schools for improvement in fall 2022 based on 2021-22 school year results. The waiver request also seeks the ability to use Title I School Improvement funds to support schools in Good Standing that were previously identified as at risk of becoming identified as a Targeted Support and Improvement School prior to the pandemic but were not identified due to pandemic-related disruptions to the accountability system.

The full text of the proposed waiver is posted on [NYSED’s ESSA webpage](#), as is information on how to submit a [public comment through an online submission form](#). The submission form can be translated into languages other than English. Public comments will be accepted through Wednesday, December 15.

Next Steps

If the waiver is approved by the USDE, the Department will propose to the Board of Regents that it adopt such amendments to Commissioner’s Regulations to implement the waiver.

-30-

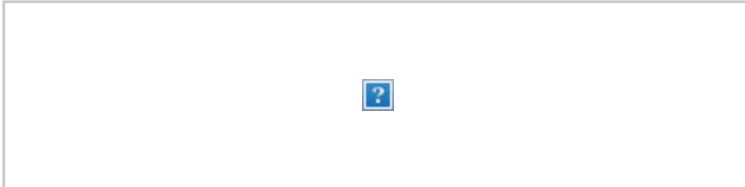
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From: [NYSEDP12](#)
To: [NYSEDP12](#)
Subject: NEWS RELEASE: PROPOSED FEDERAL WAIVER FOR STATE ACCOUNTABILITY REQUIREMENTS AND SCHOOL IMPROVEMENT FUNDING NOW AVAILABLE FOR PUBLIC COMMENT
Date: Wednesday, December 1, 2021 12:07:43 PM
Attachments: [image001.png](#)
[image002.jpg](#)
[image003.emz](#)
[image004.png](#)
[image005.jpg](#)
[image006.jpg](#)
[image007.jpg](#)



New York State Board of Regents
Betty A. Rosa
Commissioner of Education
The State Education Department
The University of the State of New York / Albany, NY 12234
Office of Communications



NEWS
FOR IMMEDIATE RELEASE December 1, 2021

Media Contact:
JP O'Hare or Jeanne Beattie
(518) 474-1201
www.nysed.gov

**PROPOSED FEDERAL WAIVER FOR STATE ACCOUNTABILITY REQUIREMENTS
AND SCHOOL IMPROVEMENT FUNDING NOW AVAILABLE FOR PUBLIC COMMENT**

Public Comments Accepted Through December 15

Public comments are now being accepted on a proposed waiver request to the U.S. Department of Education (USDE) related to state accountability requirements under the Every Student Succeeds Act (ESSA) and Title I School Improvement Funding, State Education Commissioner Betty A. Rosa announced today.

"New York's schools continue to feel the impact of the pandemic and the unprecedented

circumstances it has caused,” Board of Regents Chancellor Lester W. Young, Jr. said. “We encourage educators, families, students and, indeed, all those with interest in education to provide feedback on this important matter.”

“The Department is committed to determining the most appropriate timeline and manner for re-starting the ESSA accountability system,” Commissioner Rosa said. “In a year that tested the resolve and ingenuity of our educators, we continue to work with identified schools to provide support models that encourage growth. Stakeholders may rest assured that even if USDE approves a waiver, the critical work to support our schools will continue.”

The New York State Education Department (NYSED) waiver request proposes to eliminate some accountability indicator requirements to identify schools for improvement in fall 2022 based on 2021-22 school year results. The waiver request also seeks the ability to use Title I School Improvement funds to support schools in Good Standing that were previously identified as at risk of becoming identified as a Targeted Support and Improvement School prior to the pandemic but were not identified due to pandemic-related disruptions to the accountability system.

The full text of the proposed waiver is posted on [NYSED’s ESSA webpage](#), as is information on how to submit a [public comment through an online submission form](#). The submission form can be translated into languages other than English. Public comments will be accepted through Wednesday, December 15.

Next Steps

If the waiver is approved by the USDE, the Department will propose to the Board of Regents that it adopt such amendments to Commissioner’s Regulations to implement the waiver.

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ATTACHMENT F. Accountability Waiver Interest Survey Data and Public Comments Received

November 4-19, 2021 Accountability Waiver Public Interest Survey Response Data
(Based on 3,888 Responses)

3. Which statement most closely represents your opinion?

NYSED should neither report the performance of schools on ESSA accountability indicators using results from the 2021-22 school year nor use the results to make accountability determinations.

[2134 responses](#)

NYSED should report the performance of schools on ESSA accountability indicators using results from the 2021-22 school year and use the results to make accountability determinations.

[313 responses](#)

NYSED should report the performance of schools on ESSA accountability indicators using results from the 2021-22 school year for informational and planning purposes, but not use the results to make accountability determinations.

[1385 responses](#)

Other. Please explain in the following question.

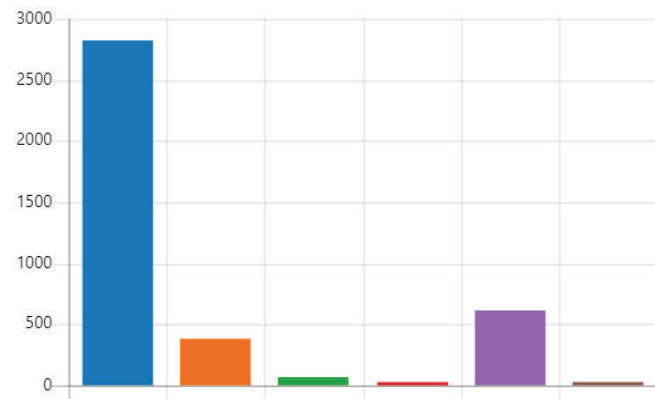
[56 responses](#)

December 1-15, 2021 Accountability Waiver Public Comment Period: Data Analysis
(3,931 Total Responses)

5. To what degree do you support NYSED's proposed waiver request?

[More Details](#)

● Strongly Support	2816
● Support	377
● Neither Support nor Oppose	67
● Oppose	28
● Strongly Oppose	608
● Don't Know/No Opinion	28



Public Comments:

Of the 3,931 respondents, 1,270 respondents provided comments.

#	Date of Submission	Stakeholder Group	Degree of Support for Waiver	Provided Comment (Note: Items have been redacted to ensure privacy of stakeholders)
1	12/1/21 12:51:36	Principal	Strongly Support	We have so many students that have missed an incredible amount of school due to quarantines, illness etc. In addition, when using remote learning many of our students (over 20%) do not have high speed internet therefore cannot participate in much of the instruction. It is unfair to both students and teachers under these circumstances these past 2 plus years.
2	12/1/21 12:57:23	Principal	Strongly Support	<p>The 3-8 assessments should not be given during the 2021-2022 school year or any future years. The 8th grade assessments alone take up six days of instructional time. This is not smart when we are trying to the loss of learning that resulted from the COVID epidemic. In addition, NYS Regents exams should be waved as a graduation requirement. I feel the test is useful, but should not determine whether a student should graduate. The state and federal governments should trust that schools and communities have a vested interest in teaching students beyond the fear of retribution for not doing so.</p> <p>As a CSI school, we have done everything that state has asked and recommended. We have shown great improvements, but are unclear what has to be done to be considered in good standing.</p>
3	12/1/21 12:58:25	Principal	Strongly Support	This is the first year all students are back in the classroom. Students have had a lack of school structure for 13 months prior to this school year. We have spent countless days this year focusing on students' social and emotional health, as we should, and it is all that we should be focused on this year. We are playing catch-up academically, but to force a mandated assessment on these children will do nothing more than cause unnecessary frustration. Give them this year to adjust back to as normal of a school life as we can with mask and social distancing requirements. It will give students time to catch up academically and assess them during the 2022-2023 school year. As both a parent and a principal, please understand our children mean more to us than a test score!
4	12/1/21 12:58:28	Assistant Superintendent	Strongly Support	I strongly support the waiver and believe Teacher scores should be handled the same way. Meaning that it should be based on the 2021-22 and the shown growth in the 2022-23 school year. Otherwise the growth scores are going to not mean anything.
5	12/1/21 13:06:15	Teacher	Strongly Support	For the past several years, the role of Regents exams in an equitable public education system has been known as dubious at best. Now more than ever, in the context of an enduring global pandemic, it is essential to provide students with educational experiences that account for the disruption and trauma that so many have endured, and to remove barriers that may hinder their success in post-secondary life. The Regents exam should be waived in the best interests of educational equity for New York City public school children.
6	12/1/21 13:09:14	Superintendent	Oppose	I oppose because of the concept "to not remove Targeted Support" schools from the list. I perfectly agree that metrics from the last two years are problematic in identifying schools in need of improvement / support. That said, the metrics themselves are quite considerably flawed to begin with. Further, by completing this action without a way to exit a list you will keep schools on the list who have made considerable changes in practice over the past few years. Those schools are now left facilitating plans that originated in data sets from 18-19. It makes very little sense and adds to a general malaise about the right work. Please strike that language and figure out a better way to support schools who would like to be removed from lists that uncharacteristically target them as "bad" schools.
7	12/1/21 13:16:21	Principal	Strongly Support	I strongly support this waiver as the pandemic is still raging. We are quarantining students each day and their education is interrupted and is lacking continuity. Until we can mandate this vaccine and get COVID and all its variants under control, we need to get rid of state/federal testing mandates for education. If we cannot do that, we need to remove the accountability and make allowances for schools.
8	12/1/21 13:19:05	Superintendent	Strongly Support	<p>As already recognized by NYSED and in Board of Regents Chancellor Lester Young's comment "New York's schools continue to feel the impact of the pandemic and the unprecedented circumstances it has caused", recovery to meet standards of accountability will take time. As we progress in the current year, we recover from a year and a half of basically being "shut down". Although our school district saw in-person learning for grades K-8 and alternating days for grades 9-12 within that year and a half, the instruction was not to the level of rigor due to COVID restrictions. Small group and 1-1 learning opportunities, critical especially at the younger, developmental levels, were and are, non-existent due to COVID restrictions. Currently, we have full PreK-12, in-person learning, but still with restrictions of mask-wearing, being socially distanced, and being placed on "forced" quarantine restrictions. Quarantine regulations place students on remote learning which disrupts the learning process and are not ideal.</p> <p>It is my opinion in regards to Commissioner Rosa's statement "The Department is committed to determining the most appropriate timeline and manner for re-starting the ESSA accountability system," that until we lift the current COVID restrictions of mask-wearing, socially distancing, and quarantining, expecting the current accountability standards are unrealistic. To also add that attendance recovery for our school, which historically has not been an issue pre-COVID, will take time to earn back the trust and the feeling of security that schools are safe and that education is important, given all the waivers of expectations that have occurred.</p> <p>I truly appreciate NYSED and Commissioner Rosa for allowing submittal of thoughts and do not envy the task of defining a final decision, but again, in my opinion, we need a year of "normal" learning to then be followed by a year where accountability is expected. Learning recovery to meet the high standards of rigor for NYS (which I am a proponent of) will take time. The only other solution would be to redefine accountability measures which wouldn't be my recommendation after all the work that has gone into defining the system.</p> <p>Best of luck in the decision making process.</p>
9	12/1/21 13:22:08	Parent	Strongly Support	I also feel that NYS Assessments should be reconsidered this year. Teachers are feeling pressure to help their students do well on the test, and as a result are not having time to fill gaps.
10	12/1/21 13:26:24	Teacher	Strongly Support	The pandemic has affected all of our students and teachers in myriad ways. The impact of the remote/hybrid schooling has not fully been studied. Many students in urban schools were unable to access their curriculum for a variety of reasons. Holding these students and teachers accountable for circumstances out of their control would further exacerbate the inequities already experienced by so many of people during the pandemic. Please waive the accountability determinations and school improvement identifications using data from the 2021-22 school year and provide flexibility in the use of Title I School Improvement Funds.
11	12/1/21 13:34:36	Parent	Strongly Support	There have not been two days in a row at our own school with things "normal" let alone comparisons to other districts and their Covid messes. I cannot imagine how there could be any norms that could be established with Covid constantly changing the game unequally.
12	12/1/21 13:40:38	School Staff	Strongly Support	We need to make things equitable. At this point, our students coming from various socio- economic backgrounds, races, ethnicities, etc., have had very differing experiences due to the pandemic. Students and schools should not be penalized for factors that are outside of their/ our control. As a school counselor, I am seeing first hand from a mental health standpoint that our students are suffering. Their lack of social interaction, structure and rigor has caused them to spiral now that we are back full time. Using all of this against us would be unjust.

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13	12/1/21 13:41:56	Parent	Strongly Support	We are in unprecedented times and the pressure of this type of accountability is not fair to schools, teachers, but most of all students. This pandemic is not yet over and life is not back to normal, which means this level of accountability is unfair and blind to the greater needs and challenges our nation, schools, families, and children are facing. When the government can get this under control and life become more normal that will be the time we can start worrying about assessment data and school accountability.
14	12/1/21 13:43:48	Teacher	Support	With all things pandemic being considered the ONLY thing that has become glaringly obvious is how much SCHOOLS
15	12/1/21 13:44:20	School Administrator	Strongly Support	There is not enough data from the past two years to provide for an accurate accountability status rating.
16	12/1/21 13:46:05	Teacher	Strongly Support	Students have had disrupted schooling since March of 2020 and we are barely beginning to get our footing around being back- I strongly feel that we should continue to hold off on administering Regents exams for the duration of this school year.
17	12/1/21 13:50:43	School Staff	Strongly Support	Please consider supporting the removal of Regents Exams for the 21-22 school year
18	12/1/21 13:51:26	Community Based Organization Leader/Representative	Strongly Support	As a board member and parent I feel we need to focus on supporting our schools, teachers, and students to help move us forward. The assessment data accountability and how schools access to Title 1 funds should not be a priority when there are many more pressing issues facing all Americans today. We need to prioritize social emotional health and address the affects of the pandemic on our students. School districts needs to be supported by good policies, financial support, and waivers such as this. Standardized test scores should not be a priority right now. Schools should not have to worry about access to Title 1 funding and budget woes. Please really listen to educators, parents, and school administrators from New York and all across the nation. They are the ones living this. Government officials in their offices likely have not idea what it is like in school today, so they should not be making decisions that board members and parents, like myself, as well as educators, administrators, and unions do not support.
19	12/1/21 13:53:07	Teacher	Strongly Support	Students have been impacted by the COVID-19 pandemic socially, emotionally, academically, and economically. They are severely behind in all areas and are operating at a maturity level much lower than their age level. Students are struggling with maintaining emotions for an entire school day. They do not see the value in setting goals for the future and do not understand the importance of achieving high standards in their academic classrooms. The ripple effect of the pandemic has set back our students tremendously in all of the above listed areas, and it is unfair to assess teachers and school districts on test results for this school year (2021-2022).
20	12/1/21 14:00:26	Parent	Strongly Support	Please eliminate some accountability indicator requirements to identify schools for improvement in fall 2022 based on 2021-22 school year results.
21	12/1/21 14:05:38	Teacher	Support	With regard to all things pandemic, the ONLY thing that has become glaringly obvious is how much schools actually do for our kids. From counseling, to interventions, to diagnosing mental health issues, to parenting, to transportations, watching out for physical and mental well being, to basic necessities; schools do it all. While our kids have been out these things have all suffered, tying scores and improvement levels to factors out of our hands is not only ludicrous. The level of control that professionals and districts have over anything that happens when students are not in front has become apparent as well. Attaching scores that are punitive and damaging to a system caused by handcuffing our teachers and schools would be ill-advised. Another suggestion would be to detach or change the way that graduation is attached to school rankings. Calling attention to dropout rates was a problem in decades past. Now schools are punished if a child takes an extra semester or year to graduate because they are not exiting with their cohort. If the goal is graduation then the time it takes to get there should be irrelevant.
22	12/1/21 14:06:05	Principal	Strongly Support	Even though we are 100% in person, the impact that COVID has created a greater disruption to the delivery of education and support services than the previous year and half. We have seen a significant increase in the number of young students contracting COVID, which is resulting in a much higher rate of students/classes needing to quarantine and miss school compared to last year. Students are being quarantined multiple times in the first 1/3 of the year. Despite vaccination status, the COVID impact on staff attendance has not improved this year, leaving many classes to be covered with substitutes during staff quarantine.
23	12/1/21 14:08:17	Teacher	Neither Support nor Oppose	I feel that all schools need extra support this year, especially at the primary level. The children at the primary level haven't even experienced a full year of school. Teachers need support from para professionals on a full time basis in order to have these children successful in their academic careers.
24	12/1/21 14:14:18	Teacher	Strongly Support	The COVID 19 pandemic continues to affect families and students and therefore schools. Students are missing school for quarantine due to sick family members. Students are on extended medical leave when they have COVID. Attendance continues to be terrible. Students ability to keep up with work is diminished by lack of high speed internet, parental support at home (possible due to illness!) and the simple fact that they are sometimes too ill to work. Not to mention some districts are forced to go remote due to staff shortages. There continues to be massive gaps in learning and students and schools should not be penalized.
25	12/1/21 14:25:09	Superintendent	Strongly Support	Response has been emailed.
26	12/1/21 14:30:19	Parent	Strongly Support	I do not feel it is fair or appropriate to hold students, teachers and taxpayers hostage to the data gathered during Covid/interrupted learning. There is no way an already flawed system can accurately assess progress during the last few years.
27	12/1/21 14:30:52	School Staff	Support	The entire public school paradigm needs to be completely scrapped and start all over. It is a broken system that hasn't worked in years. All of the programs and money spent on fixing these problems are like putting a band aid on a broken leg.
28	12/1/21 14:59:33	Teacher	Don't Know/No Opinion	All schools are struggling right now in the wake of an unprecedented global health emergency. While it would be unfair and illogical to hold school districts to standards established in the pre-pandemic era during the current school year that is still being adversely affected by Covid-19, it is also absurd to continue to use these measurements of accountability for any districts. We shouldn't hold schools accountable for needs identified prior to the 2019-2020 school year. We should establish new measurements to ascertain school accountability and abolish the old system along with the lists of schools identified based on them. It's a new world of teaching which requires new evaluation procedures.
29	12/1/21 15:12:43	Superintendent	Strongly Support	The teachers at the [REDACTED] have been working hard all year. We have been concentrating on the learning gap created by shut downs that forced us to pivot to remote learning. In addition we had to implement the hybrid model for the 2020-21 School Year. Given the many barriers that we faced, I feel that holding teachers and school districts accountable during the COVID 19 Pandemic would not be fair or just.
30	12/1/21 16:27:24	Teacher	Strongly Support	As an English teacher who works with 100% English Language Learners, I strongly support the waiver. In the wake of the pandemic, our students need a lot of additional space and support for language development. I hope that we can provide a fair and equitable response that considers the needs of all learners, particularly those most impacted by the pandemic.

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31	12/1/21 16:28:57	Principal	Strongly Support	The pandemic continues to directly affect learning on a daily basis. It is unfair for schools to be ranked and labeled during a global pandemic that is far from being under control. It is also unfair for schools with high needs to lose funding.
32	12/1/21 17:05:29	Superintendent	Strongly Support	The waiver is the prudent way to go at this time and the 2022-2023 return to accountability is a fair measure as this would allow for back-to-back year (21/22 and 22/23) comparisons where students were physically and more consistently in school.
33	12/1/21 17:15:26	Principal	Strongly Support	We are still fully in this pandemic and navigating the trauma our students are enduring. Students are quarantined and missing vital pieces of the curriculum that they just can't fully receive online or worse not at all.
34	12/1/21 18:09:27	Principal	Support	<p>I would like to partially support the waiver request because it states "proposes to eliminate some accountability indicator requirements to identify schools for improvement in fall 2022 based on 2021-22 school year results". I believe in a school year that has continues to have several challenges for students and families academically, socially, and economically. should eliminate all indicators. As the Principal of a small transfer school, our students have been tremendously impacted by the pandemic. Many of our students and their families have suffered in a variety of ways which include but not limited to:</p> <ul style="list-style-type: none"> - reduction of wages by parent(s) or caregiver - not having permanent housing due to economic reasons - students having to care for younger siblings - students forced into part or full time work instead of attending school. - socially students have been more withdrawn socially and academically - unresolved trauma which requires professional counseling - students and families afraid of Covid - students and families afraid of vaccine <p>These are some of the major issues that still impact our school and many other schools around NYC for the last year and a half. While students and their families have been happy to return, they have struggled to balance these issues and function in school "as students normally would". i believe many of our students are trying to adjust to the new normal but are still having a difficult time despite all of our outreach, counseling, and more importantly educating. It is extremely difficult for students to think about science when they are hungry (don't like school food) or have to worry about working all night.</p> <p>Thank you</p>
35	12/1/21 18:23:14	Principal	Strongly Support	Students and staff are struggling more this year. We need to focus on the Social Emotional Wellbeing of students and staff during this challenging time. It is unethical to hold a high stakes assessment over the heads of everyone involved. Student's progress is monitored routinely as that is what good instruction involves.
36	12/1/21 18:25:48	District Personnel	Strongly Support	This year, due to quarantine regulations, we have had more that 600 children miss over a week of school. Our teachers are doing as much as they can to keep students on track with their studies but nothing can replace time in the classroom with our professional educators. I would urge the Federal Government to waive the requirements around accountability status until we have students in school consistently.
37	12/1/21 18:57:46	Teacher	Strongly Support	Students in our district live in poverty and many have missed weeks, even months of school over the last two and a half years due to the pandemic. They have been learning remotely with no parental supervision and in some cases no devices. In addition, once back in school, many students have had to quarantine over and over losing valuable instruction time.
38	12/1/21 19:30:09	Teacher	Strongly Support	COVID is devastating our school education system. More tests is not what is needed now.
39	12/1/21 20:33:50	Principal	Strongly Support	As a leader in a city school district, I experience on a daily basis the ongoing effects of the COVID-19 pandemic. This waiver gives all learners more time to recover from the trauma caused by the pandemic. Thank you for your consideration.
40	12/1/21 20:54:30	Principal	Strongly Support	The 21-22 school year is one of transition where some students and teachers have not been in the classroom for 18 months. There are a myriad of challenges and
41	12/1/21 21:05:43	Parent	Strongly Support	School Accountability would not be fair or appropriate when school can not be responsible for student lack of learning due to quarantine status. Many quarantines students had to repeatedly quarantine due to large family units acquiring exposure or illness.
42	12/1/21 21:07:43	Principal	Strongly Support	We have exhausted our abilities to educate students to the best of our abilities due to the pandemic, school closures, repeated quarantined and learning loss from the shutdowns.
43	12/1/21 21:14:49	Principal	Strongly Support	So many of our students have not experienced a normal school year in almost two years. Teachers and school districts are doing everything they can to close gaps, but it is proving to be more difficult than anyone expected. The social emotional state of our students is lower than I have ever seen. Our students need to relearn how to be in school and interact with others. Our students and our schools need grace and time to grow socially and academically. This in no way means students will not be challenged and expected to work hard and reach for the standards expected, but they do need grace and time.
44	12/1/21 21:24:20	Parent	Strongly Support	As our nation, state and communities continue to recover from the pandemic, focus should be placed on things more meaningful and impactful for students and schools. High stakes accountability measures are not important in comparison to quality local assessments. Local assessments, such as project-based and problem-based assessments do more to help students to develop the 21st century skills that they truly need to be successful and well adjusted adults. Having the pressure of the federal and state accountability measures does nothing to re-acclimate our children towards their developmental goals and are an impediment to community schools who are trying to provide their students with engaging learning experiences and support their social-emotional wellbeing.
45	12/1/21 21:54:51	Teacher	Strongly Support	This school year has already been more inconsistent and stressful than last year was. Students are struggling. Assessment results will not be accurate because students are not back to a normal schedule, as much as we would like to think they are.
46	12/1/21 22:00:57	Other	Strongly Support	I was a superintendent during the pandemic and saw the impact on students. A new accountability system is necessary as students relearn who they are as learners. Consideration should be given to project based assessment over standardized. Grading practices and scores have a significant impact on social emotional wellness and we should be rethinking new ways to measure growth and performance. Title 1 SIG monies for schools in good standing should be earmarked for addressing COVID 19 learning loss similar to the ESSER and GEER grants this year.

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47	12/1/21 22:37:49	Principal	Strongly Support	The shortage of teachers and TA's through the pandemic has made it very difficult to provide the appropriate supports needed for students. The learning loss that has happened needs to be considered, as well. This may take districts many years to recover from last school year and this school year is just as difficult with students being quarantined on multiple occasions. They are able to Zoom in, but it is not the same and their social-emotional well being is being compromised significantly.
48	12/2/21 5:11:46	Parent	Strongly Support	The pandemic has left our communities extremely fragile- we need time to heal and not felt the burden of strong measures of accountability at this time. Please pause and allow us flexibility to continuing healing.
49	12/2/21 6:15:53	Teacher	Strongly Support	Teachers and schools should not be held accountable for students scores. Many students are 1 yr- 2 years behind due to Covid. There are so many quarantined students each month. It will take years to try to get students back on track.
50	12/2/21 6:54:26	School Staff	Strongly Support	Teachers deal with enough. Stop punishing schools for the mistakes of politicians.
51	12/2/21 7:14:36	Teacher	Strongly Support	Students are at least 1.5 years behind, it is not fair to schools to hold them accountable due to having to teach virtually the last 2 years.
52	12/2/21 7:32:51	Teacher	Strongly Support	This year really should be focusing on Social-emotional learning since day one. There is some curriculum required for the classroom, but it doesn't come close to covering everything students have dealt with since March 2020. They need more tools and supports, rather than to be pushed into curriculum that is not feasible to catch up with. Move everything back a year. But give everyone some breathing room. This year has somehow been even harder for students and teachers than last year was. Speaking with teachers in the building, every week has somehow seemed worse and worse. Meaning every week you speak with a teacher, you are seeing them at the worst point they have been at.
53	12/2/21 7:47:03	Teacher	Strongly Support	I think that given the circumstances of the school year and all of the outside factors of the pandemic it would difficult to use the Regents Exam as a factor in rating teachers this year. There is a lot of stress on teachers just to keep up with the demands of each students education let alone when students, teachers, and teachers family members are getting quarantined/diagnosed with Covid. In a normal year, these factors don't exists so given the circumstances I strongly believe that teachers shouldn't have the added pressure of worrying about this affecting their end of the year rating.
54	12/2/21 7:55:57	Teacher	Strongly Support	This school year has been anything but normal so far. In fact, it has been quite a bit more challenging than last year. Major learning gaps aside, we are still dealing with mass quarantines daily, inadequate resources, and a lack of overall state support while trying to give our students the best education possible, while still honoring their mental and physical health.
55	12/2/21 8:02:24	Superintendent	Strongly Support	There needs to be a process/plan for schools and districts to earn their way out of being identified as a school of improvement or district in need of improvement without State Assessment scores. We have done a tremendous amount of work and continually need to submit our plans although we are making significant progress.
56	12/2/21 8:05:59	Teacher	Strongly Support	Although students are in school full time, the gaps from the previous two years are very evident. We are having to go back and teach concepts from previous courses, ex. teaching a topic that is in Algebra to Algebra II or Pre-Calculus students. As well as some students are still being quarantined at times so the learning is still not consistent. The students are also having difficulties being back in school full time with their study skills and socially. Getting back to a "normal" is happening slowly.
57	12/2/21 8:06:33	District Personnel	Strongly Support	Thank you. Every District anticipated that our students would struggle when they returned to full-time, in-person school in September 2021, but what has actually happened since students returned has surpassed anything we could have imagined. Students, faculty, staff, parents, families, and administrators are all struggling right now. The social-emotional needs are so strong that academics are suffering. We greatly appreciate the flexibility and need to focus on supporting our community's social-emotional well-being. The impact of COVID-19 on education is tremendous. We need to put our time and energy into figuring out new ways to support our students academically and emotionally. In order to do this, accountability needs to be put on hold making this waiver critical. This is a complex situation that will require all of us to work together as a team to solve. I am confident that, together, we will figure this out. T
58	12/2/21 8:14:20	Teacher	Strongly Support	It would be an injustice to everyone involved to even consider the idea. Our teachers, students, families, and communities as a whole are being negatively affected every single day between illness, quarantines, staff shortages, etc.
59	12/2/21 8:14:41	Superintendent	Strongly Support	Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State must continue to request waivers to federal accountability standards. The information gleaned from student performance data and social-emotional interventions presents an inarguable fact: excluding students from school (Mandated school closure, and quarantines) has had, and continues to have negative consequences for students. Districts across the state have borne the weight of this pandemic since its inception. We have: drastically altered instructional models and interventions to ensure continuity of instruction, fed every child who has required breakfast and lunch in our institutions, developed extensive plans to return students to in-person learning, and retrofitted our facilities and operations to accommodate public health mandates. All are eager to return to normal operations. The question remains: What is the new normal? Grace must be granted while all in the field are still grappling with the answer to this question. It is absolutely appropriate to assess our students to discern the true impact of the pandemic and establish new baselines for accountability. This will take time, patience, courage from our leaders, and most importantly a renewed focus on what is best for our students and staff.
60	12/2/21 8:22:06	Teacher	Neither Support nor Oppose	I don't believe that any growth that schools make with students should be overlooked. We continue to face a high absentee rate due to the pandemic. We should celebrate and take schools and districts off identified lists for any and all successes they achieve. However, in light of the high absentee rate and the disgrace to teaching (concurrent model of delivery) we should not be penalizing schools or districts for any short fall. They are facing and will continue to face huge obstacles and should not be demoralized for trying new things to overcome the barriers.

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61	12/2/21 8:23:48	School Staff	Strongly Support	<p>Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State must continue to request waivers to federal accountability standards. The information gleaned from student performance data and social-emotional interventions present an inarguable fact: excluding students from school (Mandated school closure, and quarantines) has had and continues to have negative consequences for students.</p> <p>Districts across the state have borne the weight of this pandemic since its inception. We have drastically altered instructional models and interventions to ensure continuity of instruction, fed every child who has required breakfast and lunch in our institutions, developed extensive plans to return students to in-person learning, and retrofitted our facilities and operations to accommodate public health mandates.</p> <p>All are eager to return to normal operations. The question remains: What is the new normal? Grace must be granted while all in the field are still grappling with the answer to this question. It is absolutely appropriate to assess our students to discern the true impact of the pandemic and establish new baselines for accountability. This will take time, patience, courage from our leaders, and most importantly a renewed focus on what is best for our students and staff.</p>
62	12/2/21 8:32:36	Superintendent	Strongly Support	<p>Due to the pandemic and the need to hold instruction in a Hybrid method, the data that can be gleaned from the accountability tests is not complete and will not allow for correct information. Although students attended school on a regular basis-- two days per week in person, three days remotely - only students who attended in school instruction on the day of the tests sat for the tests. Many parents kept their student home on testing day with the belief that the stress and upset caused by the pandemic was enough for their student and they also did not want their students' scores to negatively impact future years.</p> <p>Our teachers have been heroes during this pandemic crisis; doing what is best for each child, learning a new way to instruct without much professional development. I am amazed that they have done so well, considering they are also handling the effects of the pandemic personally.</p> <p>On a side note -- it was frustrating for me as well as others to call any state or federal agency for help or reporting as most were working from home. Our teachers came to school every day to teach our students, took chances with their own and their families health. If the scores from these tests are used and we find that districts need to be under scrutiny based on the scores -- aren't we just punishing those that came in a did what needed to be done for students? Adding the stress of state and/or federal mandates onto an already stressful workload seems unrealistic to me -- particularly because the data is incomplete.</p>
63	12/2/21 8:38:04	School Administrator	Strongly Support	We as educators are trying our best to combat the effects of this pandemic. We are seeing attendance rates go down for several reasons beyond our control which are negatively affecting our students.
64	12/2/21 8:42:57	Teacher	Strongly Support	We have had students who are absent due to quarantine who cannot receive adequate instruction remotely. There are just some things that students can't teach themselves and when you stack all of those things up, it leads to poor test scores.
65	12/2/21 8:46:27	Teacher	Strongly Support	With the learning gaps due to COVID modifications to schedules and learning, students and teachers need to be focused on filling gaps and not on external standardized testing.
66	12/2/21 8:51:53	Superintendent	Strongly Support	Districts are still dealing with an enormous amount of COVID related issues. In many ways, this school year is more challenging than last year with everyone in school. Student behaviors due to increased social-emotional concerns are making it very difficult for educators. Teachers are responsible for engaging students in missed learning and new learning in order for them to meet the grade level or content level expectations. Districts frequently have students on mandatory quarantine who are either engaging or not engaging remotely this year. Adjustments need to be made for districts where remote learning for mandatory quarantine students is not possible. Since we want to encourage participation on 3-8 assessments, the accountability switch needs to be turned off. Use these assessments as a baseline for future assessments.
67	12/2/21 9:12:16	Assistant Superintendent	Strongly Support	This accountability system needs to be thoroughly examined, as we have not had meaningful assessment data for multiple years now.
68	12/2/21 9:15:01	Teacher	Strongly Oppose	If we remove the accountability standards, teachers are less likely to continue to focus on meeting standards and students also do not have an incentive. It is likely to make our results even worse down the road without that incentive. We need to have accurate data about the gaps in learning caused by the pandemic. Removing accountability standards will make that data less reliable and useful for our purposes going forward.
69	12/2/21 9:42:09	Assistant Superintendent	Strongly Support	Thank you for taking the time to thoughtfully consider the needs of all school districts during this school year. The information and rationale for each point in this memo are spot on.
70	12/2/21 9:45:41	Principal	Oppose	Waste of time if it is anything like what was done last time
71	12/2/21 9:56:24	School Administrator	Strongly Support	There is STILL a pandemic going on. We cannot even cover for sick teachers or bus drivers, and therefore should not be subject to the same accountability measures we were pre-pandemic.
72	12/2/21 10:02:35	District Personnel	Strongly Support	Things are not back to "normal" at schools, we are still trying to find our footing as what this new normal is.
73	12/2/21 10:36:13	Principal	Strongly Support	As a school leader I have found the needs assessment and plan development as part of school accountability process to be incredibly beneficial. However, that work is only productive when analyzing and making decisions based on meaningful and accurate data. Knowing that the NYS assessments in 2021 were incredibly modified (use of released questions, no written or extended response answers) and having very little participation with our fully virtual students, the assessment data is not meaningful. I strongly support NYSED's proposed waiver request for the 2021-2022 school year.

#	Date of Submission	Stakeholder Group	Degree of Support for Waiver	Provided Comment (Note: Items have been redacted to ensure privacy of stakeholders)
74	12/2/21 11:03:59	Superintendent	Strongly Support	<p>Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State must continue to request waivers to federal accountability standards. The information gleaned from student performance data and social-emotional interventions presents an inarguable fact: excluding students from school (Mandated school closure, and quarantines) has had, and continues to have negative consequences for students.</p> <p>Districts across the state have borne the weight of this pandemic since its inception. We have: drastically altered instructional models and interventions to ensure continuity of instruction, fed every child who has required breakfast and lunch in our institutions, developed extensive plans to return students to in-person learning, and retrofitted our facilities and operations to accommodate public health mandates.</p> <p>All are eager to return to normal operations. The question remains: What is the new normal? Grace must be granted while all in the field are still grappling with the answer to this question. It is absolutely appropriate to assess our students to discern the true impact of the pandemic and establish new baselines for accountability. This will take time, patience, courage from our leaders, and most importantly a renewed focus on what is best for our students and staff.</p>
75	12/2/21 11:04:56	Superintendent	Strongly Support	<p>Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State must continue to request waivers to federal accountability standards. The information gleaned from student performance data and social-emotional interventions presents an inarguable fact: excluding students from school (mandated school closure, and quarantines) has had, and continues to have negative consequences for students.</p> <p>Districts across the state have borne the weight of this pandemic since its inception. We have: drastically altered instructional models and interventions to ensure continuity of instruction, fed every child who has required breakfast and lunch in our institutions, developed extensive plans to return students to in-person learning, and retrofitted our facilities and operations to accommodate public health mandates.</p> <p>All are eager to return to normal operations. The question remains: What is the new normal? Grace must be granted while all in the field are still grappling with the answer to this question. It is absolutely appropriate to assess our students to discern the true impact of the pandemic and establish new baselines for accountability. This will take time, patience, courage from our leaders, and most importantly a renewed focus on what is best for our students and staff.</p>
76	12/2/21 11:18:30	Parent	Strongly Support	With the current world climate as it is, it would be insane to use any accountability measures against students and teachers.
77	12/2/21 11:33:23	School Staff	Strongly Support	<p>Until the pandemic ends for all parts of NY, SED must continue to request waivers from federal accountability standards. The information gleaned from student performance data and social-emotional interventions presents an inarguable fact: mandated school closures, remote learning, interrupted learning and quarantines have had negative consequences and continue to impact learning.</p> <p>Districts across the state have borne the weight of this pandemic since it began. We have drastically altered instructional models and interventions to ensure continuity of instruction. We have fed every child who has required breakfast and lunch in our institutions. We have developed extensive plans to return students to in-person learning and we have retrofitted our facilities and operations to accommodate public health mandates.</p> <p>All are eager to return to normal operations yet the question remains, "What is the new normal?" Grace must be granted while all in the field are still grappling with the answer to this question. It is absolutely appropriate to assess our students to discern the true impact of the pandemic and establish new baselines for accountability. This will take time, patience, courage from our leaders, and most importantly a renewed focus on what is best for our students and employees.</p>
78	12/2/21 11:42:13	School Staff	Strongly Support	As a School Psychologist it is clear to me that use of 20-21 data for comparison purposes would lack validity because of differentiated instruction styles (and lack of exposure for a significant portion of the sample size) to the comparison sample.
79	12/2/21 11:53:00	School Administrator	Strongly Support	Until the pandemic ends for all parts of NY, SED must continue to request waivers from federal accountability standards. The information gleaned from student performance data and social-emotional interventions presents an inarguable fact: mandated school closures, remote learning, interrupted learning and quarantines have had negative consequences and continue to impact learning. Districts across the state have borne the weight of this pandemic since it began. We have drastically altered instructional models and interventions to ensure continuity of instruction. We have fed every child who has required breakfast and lunch in our institutions. We have developed extensive plans to return students to in-person learning and we have retrofitted our facilities and operations to accommodate public health mandates. All are eager to return to consistent operation in person. It is absolutely appropriate to assess our students to discern the true impact of the pandemic and establish new baselines for accountability. This will take time, patience, courage from our leaders, and most importantly a renewed focus on what is best for our students and employees.
80	12/2/21 11:56:26	Teacher	Strongly Support	<p>Until the pandemic ends for all parts of NY, SED must continue to request waivers from federal accountability standards. The information gleaned from student performance data and social-emotional interventions presents an inarguable fact: mandated school closures, remote learning, interrupted learning and quarantines have had negative consequences and continue to impact learning.</p> <p>Districts across the state have borne the weight of this pandemic since it began. We have drastically altered instructional models and interventions to ensure continuity of instruction. We have fed every child who has required breakfast and lunch in our institutions. We have developed extensive plans to return students to in-person learning and we have retrofitted our facilities and operations to accommodate public health mandates.</p> <p>All are eager to return to normal operations yet the question remains, "What is the new normal?" Grace must be granted while all in the field are still grappling with the answer to this question. It is absolutely appropriate to assess our students to discern the true impact of the pandemic and establish new baselines for accountability. This will take time, patience, courage from our leaders, and most importantly a renewed focus on what is best for our students and employees.</p>
81	12/2/21 11:58:22	Assistant Superintendent	Strongly Support	The impact of the pandemic has disproportionality effected traditionally marginalized groups - the groups we are cited for in our DCIP. While we continue to work tirelessly to support all students - a target designation distracts from this hard work. It creates a negative stereotype threat that inhibits our ability to succeed.

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82	12/2/21 12:13:05	Teacher	Strongly Support	As a teacher, there are so many factors that are having a negative impact on students learning/gains that I hadn't necessarily thought of. Families are thankfully being very cautious about sending their child to school if they are not feeling well. While we all appreciate this, we end up with an increase in student absences. We also have students who have had to be quarantined throughout the school year. They are able to and encouraged to participate in learning via Zoom, but there is no replacement for physically sitting in the classroom. There are educational activities that we would normally do with our classes that are not allowed because of social distancing guidelines. Group work is very beneficial for students, and now has to be very limited and have strict guidelines. Although we are back in school 5 days a week, our year is still very far from "normal."
83	12/2/21 12:46:29	Teacher	Strongly Support	At this point I believe it would be completely unfair to hold schools accountable for student achievement. The pandemic has changed schools and families. Teachers are providing work daily to quarantined students many of which do not complete it. Teachers are sending messages daily to students who are absent many of which do not even answer the message. Teachers are calling parents to try to get students at home engaged in instruction. Many of the comments we as teachers hear are: my child is having a hard time due to the pandemic, it is affecting my child's mental health. Other parents have taken it to the extreme that due to the pandemic they need more time to unplug as a family, and take additional "vacations" while school is in session. We as educators are inundated with email from parents and students daily. We are providing in-person instruction while trying to keep students at home engaged in learning. We can't be held accountable for the choices parents make in terms of educating their child. I don't believe schools can be held accountable until there is more normalcy to daily education.
84	12/2/21 12:52:25	District Personnel	Strongly Support	This school year as a school counselor has been the most stressful and trying -even compared to the last two school years dealing with pandemic-related consequences and concerns. Our students are more stressed-out than I have ever observed them to be in my 28 years as a school counselor and it is definitely impacting their ability to learn via memory issues, depression and anxiety attacks even in our top students. It is completely draining on teachers and staff as well. Any ESSA requirements that could be waived to relieve this stress for educators and students is vital.
85	12/2/21 13:05:42	Teacher	Strongly Support	There needs to be a waiver for the Regent's Examinations as this is our first year back in person in almost two years, many of these students are relearning how to study, and just be amongst other people in a structured setting. Additionally, for graduating seniors, they have not taken a Regents Exam in two years, and those who failed the ones during their Freshman year should not be held back or penalized for not passing.
86	12/2/21 13:10:41	Parent	Neither Support nor Oppose	As a parent, I am not really informed on what this waiver is for or what it will do. However, I just feel that it is necessary for the NYSED to understand how difficult this year has been so far for our kids. First, I have seen many of my friends' kids, who are very smart, dropping more advanced classes. It just seems that there is a lack desire, heart, devotion, or whatever you want to call it, amongst many of the students. Now, most of the people I know have kids in advanced classes, but I would assume that this is also affected the "other" kids as well. After a year of being "out" of school, the transition to being a top, quality student is going to take longer than the schools made it out to be. Secondly, our district suffered from problems from bus staffing issues that lasted for over 10 weeks. This cut back on the time of instruction, which had to put most of the teachers behind, in terms of covering the necessary information/material. Just with these two items, the likelihood of putting these kids in front of a high stakes test may NOT be the best idea, especially ones that can determine if a school is "failing" in any specific area.
87	12/2/21 13:40:40	Teacher	Strongly Support	Although the 2021-2022 school year has allowed full-time face-to-face instruction rather than online instruction for our students, they continue to have excessive absences because they are required to quarantine (mandated by New York State) after exposure to COVID which affects their performance on state exams. Therefore, it's unfair to impose such laws under the current circumstances of this this school year and imperative that the waiver be passed.
88	12/2/21 13:52:55	School Administrator	Neither Support nor Oppose	I am not informed enough on the data to give advice, although I do believe that the 2020-21 school year was not in line with any other year and the data should be looked at with caution when determining proposed change.
89	12/2/21 14:28:57	District Personnel	Strongly Support	We are still battling covid related issues in our school. We've been at times this school year, with the winter yet to come. Outside consultants that have worked with our district on improvement are hesitant about face to face interactions. The work that needs to be done seems to take longer than usual. Please provide us some relief from the requirements and provide the waiver request as suggested.
90	12/2/21 17:02:43	Superintendent	Support	Districts across the state have borne the weight of the pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In [REDACTED], we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request

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91	12/2/21 17:35:28	Parent	Support	<p>The NYSED should not be placing any additional schools on either the Targeted School Improvement (TSI) or Comprehensive School Improvement (CSI) lists. In addition to not getting a waiver from placing schools on these lists, the NYSED must go further and insist on the ability to immediately remove ALL NYS schools currently on either the TSI or CSI list. It appears that there is essentially NO OFF RAMP currently provided to any of these schools. My child's school was placed on this list because over 75% of the students refused to participate in State testing in 2019 - as is their right. The school has been stuck on this list since then because of cancelled State tests in 2020 and essentially no testing in 2021.</p> <p>It is absurd for NYS to evaluate any schools based on the senseless NYS standardized testing in ELA and/or Math. And it is even more absurd to put a highly functional school on one of these lists based on extremely limited testing and then to create absolutely no path for that school to ever be removed from the list. The burdens placed on our school as a result of this listing are immoral and detract from the important work going on in our classrooms to support students. The charade of "Participation Improvement Plans" - which essentially force schools to coerce children into participating in harmful standardized testing against the will of their parents - needs to be stopped immediately.</p> <p>It is essential that NYSED request a waiver from both identifying new schools to be placed on the TSI or CSI lists and that NYSED immediately release all schools currently trapped in that status. ENOUGH!</p>
92	12/2/21 17:48:28	Teacher	Strongly Support	students and teachers are facing on going challenges with the COVID pandemic. With students and teachers being quarantined and/or sick, this school year has proven to be very disjointed and difficult to prepare students, equitably, for high stakes examinations such as the Regents Examinations.
93	12/2/21 18:31:39	Parent	Strongly Support	It is completely inappropriate to be holding anyone accountable based on pre-pandemic standards.
94	12/2/21 18:34:49	Teacher	Strongly Support	We are working very hard and making lots of progress, but so many students are frequently missing that it would not be accurate or fair to measure anyone based on this year's stats. Kids are still missing an abnormal amount of school and we're still trying to catch up, all the while spending much time distracted by kids who need to be quarantined who show up and then need to leave (that was an entire class of mine yesterday) and exposing even more people because of their refusal to wear masks correctly.
95	12/2/21 18:38:44	Principal	Support	There is a typo in the 2nd bullet. "indicators" is spelled "indictors".
96	12/3/21 7:07:12	Teacher	Strongly Support	I am seeing a huge deficit in students academic abilities and performance on summative assessments. Students are struggling simply to survive. Allowing school not to be judge based on the performance of these scared children is the right move. We are all just trying to survive and expecting students to excel at pre pandemic levels is an unrealistic goal. Continued monetary support to make sure our students have breakfast and lunch every day is also very important as so many of our students live in poverty. The more we support our schools, the more our students are supported, and the better community we cultivate for the future.
97	12/3/21 11:04:32	Teacher	Strongly Support	<p>Until the pandemic ends for all parts of NY, SED must continue to request waivers from federal accountability standards. The information gleaned from student performance data and social-emotional interventions presents an inarguable fact: mandated school closures, remote learning, interrupted learning and quarantines have had negative consequences and continue to impact learning.</p> <p>Districts across the state have borne the weight of this pandemic since it began. We have drastically altered instructional models and interventions to ensure continuity of instruction. We have fed every child who has required breakfast and lunch in our institutions. We have developed extensive plans to return students to in-person learning and we have retrofitted our facilities and operations to accommodate public health mandates.</p> <p>All are eager to return to normal operations yet the question remains, "What is the new normal?" Grace must be granted while all in the field are still grappling with the answer to this question. It is absolutely appropriate to assess our students to discern the true impact of the pandemic and establish new baselines for accountability. This will take time, patience, courage from our leaders, and most importantly a renewed focus on what is best for our students and employees.</p>
98	12/3/21 11:06:59	Teacher	Strongly Support	Our students have been through a lot in the past two years. We are working daily to close the learning gaps from March of 2020. Our district was fully remote for a year. When students came back, there were a lot of changes for them and no sense of normalcy. When students came back to the classroom we had to work to help them readjust to life at school. Some of them are still adjusting and that is evident daily. When my fourth graders went remote they were in second grade. Many of them are still struggling with second grade skills but are expected to perform at a fourth grade level. It is impossible for us to close all of these gaps in such a short period of time.
99	12/3/21 11:55:47	Other	Strongly Support	<p>The schools should not be accountable due to the following reasons:</p> <ul style="list-style-type: none"> - it is difficult to hold accountable attendance due to the nature of COVID and not wanting it to spread. - Students were not in a typical setting for over 18 months and they need a year to reacclimate to the school environment and expectations. - the federal government and state have acknowledged that student have lost instruction due to the pandemic, with the additional funding. Give the schools time to make up for the loss of instruction before holding them accountable. <p>Thank you</p>
100	12/3/21 11:57:51	Parent	Strongly Support	Until the Covid quarantine requirements no longer exist the schools should not be held accountable for absences of their students
101	12/3/21 11:59:47	Parent	Strongly Support	Children across the state are being mandated to quarantine based on close contact cases, until we stop quarantining for close contact NYS should consider the request to the waiver. [REDACTED] is doing great things and making sure these students are being taught at length when out on quarantine. I am very proud of this district as I work in a school district and cannot say the same for them.

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102	12/3/21 12:05:35	Parent	Strongly Support	Districts across the state have borne the weight of this pandemic since its inception. Our schools have drastically altered instructional models and interventions to ensure continuity of instruction; they have developed extensive plans to return students to in-person learning; they retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. Until everything is allowed to transition back to normal, I support the waiver request.
103	12/3/21 12:07:28	Parent	Strongly Support	This pandemic has hindered our children as it is, taking away from a school due to absence due to the pandemic will only hurt our children more.
104	12/3/21 12:10:26	Teacher	Strongly Support	States shouldn't be beholden to the federal government when it comes to education anyway.
105	12/3/21 12:18:50	Parent	Strongly Support	With the schools going to complete shutdown the spring of 2020 and the schools having to adapt quickly to virtual teaching and learning, plus at least a third of students and their families choosing to remain virtual during the 2020-2021 school year because of the risk of covid, I don't think those years should be counted towards evaluating the capabilities of our schools. Children, especially the younger ones and those that need extra help, cannot learn through virtual classrooms as well as they could in person. Our schools should not be judged with this extra difficulty in place.
106	12/3/21 12:38:53	Other	Strongly Support	The covid-19 pandemic has negatively impacted every family in some way. Many of the students have significant social and emotional defects due to a variety of factors. Many students are behind academically for a variety of factors. This school year we are truly seeing the full impact the pandemic has had on students and we are spending every minute that these kids are in school trying to address the significant mental health needs across all grades. Students cannot make gains academically when their mental health, emotional and social needs are not met. Many students are struggling and adding the stress of high academic achievement to school staff is leading to staff resignation. Every district is short staffed and nobody is applying to fill in the openings let alone highly qualified individuals. Every school district has been working so hard to accommodate students with the resources they have and even then sometimes it doesn't feel like enough. Something needs to give somewhere and asking districts to provide data showing high academic achievement and progression is not feasible this school year. We need to focus on the social and emotional gains first.
107	12/3/21 12:46:47	Parent	Strongly Support	Our school systems have been taxed with the burden of overcoming a large number of barriers throughout the last 18 months. Our students have been expected to rise above in scenarios that were never before imagined. The stress that I have seen my children under because of the changes that have happened in the last 18 months is undeniable. To add another burden to our school systems and to our students in the form of performance mandates is just unnecessary!
108	12/3/21 12:58:36	Parent	Strongly Support	I strongly support this waiver request.
109	12/3/21 13:00:17	School Administrator	Strongly Support	The complexity of issues as a result of this present covid event has had a significant impact on the social-emotional and academic performance of children. While working hard to meet these existing needs, it is important that we continue providing quality instruction and utilizing all means to assess our students' learning, however it is also important that the data collected from student academic performance along with school-wide attendance be utilized for local decision making and problem-solving versus broad accountability measures. I NYS seeking a waiver to not make accountability determinations and school improvement identifications using data from the 2021-22 school year and to provide flexibility in the use of Title I School Improvement Funds.
110	12/3/21 14:50:53	Teacher	Strongly Support	I believe that any standardized test right now would be difficult since all teachers are dealing with students who might not have taken a test for over a year, teachers will be in different places in the curriculum due to some schools having to change scheduling due to busing and transportation issues, planning differently for students who in a sense missed a year of instruction and have to reteach basic principles over again, and the lack of resources available especially for the "NEW" US Regents that is being required on June 1st. I believe strongly in allowing districts recommend that their departments make finals more conducive to the current path that their teachers and students are on to help students better succeed.
111	12/3/21 15:25:11	Teacher	Strongly Support	Even in so-called normal years, these ratings have served to demoralize school staff and students. The ratings are not a true reflection of the work that schools do, and are more a reflection of the socio-economic situation in the community. In a year like we are experiencing now, the ratings will be even more skewed by factors that schools had no control over.
112	12/3/21 16:08:28	Superintendent	Strongly Support	"Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In [REDACTED], we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request."
113	12/3/21 21:02:26	Teacher	Strongly Support	Our students are more than their test scores!
114	12/3/21 22:36:41	Superintendent	Strongly Support	"Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In [REDACTED] we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request."
115	12/4/21 6:28:47	Other	Strongly Support	I feel that the school administrators are working 100% to keep students, staff, etc safe at the same time trying to keep up with all that the federal and state Ed departments require with all the surveys. While trying to maintain some normalcy for students in the learning environment. Accountability to the extreme is leaning hard on everyone. I believe that everyone is trying there hardest to fulfill and give the students the best education possible. These have been very trying times for every level of the education system. I feel the most important item to be accountable for is the mental state of these students instead of administrators worrying if they are going to be on some kind of "list".
116	12/4/21 8:43:09	Teacher	Strongly Support	When nothing is equal for all of students because of the continued issues with Covid and the rules it sets for local schools I do not believe you can use testing for any reason as a means for funding, accountability or any other reason.

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117	12/4/21 8:55:55	Teacher	Strongly Support	Our children are academically, physically, and socially delayed due to the effects of the pandemic on home, school and recreational life. There is no way for a standardized test to accurately measure and tease out if lack of student progress is a result of a school's poor performance or if it is the unfortunate consequence of the social isolation and covid restrictions such as mask wearing where kids cannot correctly hear teachers, shields that they cannot fully see through, virtual learning, or the inability to teach in small groups or share materials, etc. Children are anxious, depressed and sleep disordered. Their ability to focus and learn has been deeply impacted and schools are struggling to address profound mental health needs which must come before academics.
118	12/4/21 9:00:33	Teacher	Strongly Support	Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In Elba, we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request."
119	12/4/21 9:10:50	Teacher	Strongly Support	At this time I believe that state tests should be used for informational purposes only and not used to label schools as needing improvement.
120	12/4/21 9:56:56	Teacher	Strongly Support	Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In [REDACTED], we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request."
121	12/4/21 12:29:07	Parent	Strongly Support	Districts across the state have borne the weight of this pandemic since its inception. They drastically altered instructional models and interventions to ensure continuity of instruction; they developed extensive plans to return students to in-person learning; they retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. And, of course, these effects are unequally distributed across various socioeconomic and demographic lines: students who live in poverty, who live in rural communities with unreliable internet access, whose households include non-English speakers, whose families have suffered death and illness connected to the pandemic, etc., are those most likely to have experienced educational setbacks. Without this waiver, districts with high percentages of such students will certainly suffer disproportionately as they lose access to Title I School Improvement Grant Funds.
122	12/4/21 14:05:34	Teacher	Strongly Support	Public Education is missing the mark in so many ways this year. We should NOT be pushing hard academics with the idea that we can "catch" up on loss learning. The kids lost so much more than learning. . . . they lost how to handle stress and be engaged students. We need to reteach how to interact with peers, adults, manage their emotions, improve stamina to do work (where before they just left the screen), etc. I've administered 5 different assessments in less than 3 months, and each time administration drills down on the teachers how bad the scores are. No SHIT!! We have students who have continued to miss 1/4 of the school year due to quarantines or active COVID infection. We have kids who did not attend school at all for almost 18 months, we have kids who were severely traumatized by deaths in their families, lack of food security, multiple moves due to rent issues, etc. Of course the scores are low! We need to help our students see school as a safe and valuable need in their lives. SEL, SEL, SEL should be our focus while teaching academics. But to assess these poor kids the way we are and then try to administer end of the year assessments to prove what we already know? It's demeaning, traumatizing, and bureaucratic bullying.
123	12/4/21 14:37:16	School Staff	Neither Support nor Oppose	Na
124	12/4/21 23:03:46	Teacher	Strongly Support	This is not a time to be focusing on scores! Mental health should be a top priority for students and teachers alike. Then the academics will fall into place.
125	12/5/21 8:17:35	Union Leader/Representative	Strongly Support	Covid continues to impact the reliability of any testing data and is greatly impacting attendance. These measures for determining success and for identifying schools in need of improvement are not reliable or equitable across the state.
126	12/5/21 8:36:22	Parent	Strongly Oppose	The pandemic should no longer be an excuse not to provide for our children. Let's get back to work!
127	12/5/21 9:33:12	Teacher	Strongly Support	It is taking and will take a long time to recover from the COVID months in regard to education. I have been teaching for 29 years. Never have I seen such a disruption to public education. Children were the hardest hit. Technology has become the only form of engagement that matters to them. Please do what you can to give public education the time needed to repair, catch up, and mend the negative effects that have befallen our children. Thank you.
128	12/5/21 9:34:38	Teacher	Strongly Support	Students and staff are still in vivid crisis mode. If the state truly believes in SEL and using those tenants to help our students - then test scores should not be something we have to worry about
129	12/5/21 16:53:20	Principal	Strongly Support	This year we are focusing on identifying and filling learning gaps. We are doing this while focusing on the social and emotional needs of our students. Every member of our school community is doing all we can to support our kids.
130	12/5/21 19:28:16	School Staff	Strongly Support	Students are struggling emotionally right now in ways I have not witnessed in 17 years. These needs must be met first in order for optimal learning to occur.
131	12/5/21 20:46:26	Teacher	Strongly Support	Districts across the state have borne the weight of this pandemic since its inception. We altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates and changes in mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students and their learning. [REDACTED] we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request.
132	12/5/21 22:07:20	Other	Neither Support nor Oppose	This waiver prevents schools from moving off the TSI list based upon improvements made to increase student performance.

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133	12/6/21 6:32:47	Teacher	Strongly Support	It has been a very difficult couple of years. Students (and teachers) are struggling more than ever before. Students have lower academic skills than we have seen in the past, and behaviors continue to adversely affect progress. Far too many schools would be labeled as Comprehensive and Targeted "Support Improvement Schools" for a variety of reasons. Data would be skewed, and the labeling would place unwanted pressure on an already struggling school system.
134	12/6/21 7:33:26	Teacher	Strongly Support	Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In [REDACTED], we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request.
135	12/6/21 8:06:16	Teacher	Strongly Support	The external conditions, COVID pandemic and vaccine mandates, has lead to a disruption in the continuity of services along with the lack of instruction from the previous years under on-line classes. The high stakes examination has a strict scope and sequence which can not be accommodate with so much disruption. assessments may be proven meaningless since it will be a measure of students negative impact from external conditions rather a measure of the students' academic abilities. Therefore, I support using the assessments as tool to assess needs rather than judge competencies.
136	12/6/21 8:18:56	District Personnel	Strongly Support	Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. Until everything is allowed to transition back to normal, I support the waiver request.
137	12/6/21 9:23:04	School Administrator	Strongly Support	n/a
138	12/6/21 9:40:28	Parent	Neither Support nor Oppose	Each district should be kconsidered case by case basis
139	12/6/21 9:45:18	Teacher	Neither Support nor Oppose	Should be decided based on each districts situation.
140	12/6/21 10:42:23	District Personnel	Strongly Support	Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In [REDACTED], we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request.
141	12/6/21 14:19:07	Parent	Strongly Support	Using the metric of standardized tests to determine school designations of ANY kind is counter to the principles of equity and inclusion. It patently and intentionally disregards context, the complexities of environment and stakeholder needs, and the importance of relationships to student learning. These influential characteristics are well-documented and informed by centuries of research. School culture and climate, mission, values, pedagogy and practice dictate the arc of relationships and student engagement with their environments, curriculum, and learning. Continued use of test scores to determine any measure of funding, status, and mandates for intervention will predictably underestimate that which we know to be real predictors of of the kind of student learning that can transform and amplify strengths, creativity, and innovation. Otherwise, power is being used to keep us in the 1950's, at best.
142	12/6/21 14:37:50	Other	Strongly Support	"Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In [REDACTED] we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request."
143	12/6/21 15:17:59	Other	Strongly Support	I strongly oppose to making students sit for state exams including the regents. The pandemic has limited their ability to learn. They had asynchronous labs last school year and others didn't. This is not equitable. My son is behind in math and science through no fault of his own. Forcing them to sit for exams they aren't ready for is educational abuse.
144	12/6/21 16:04:44	Parent	Strongly Support	My son has not been in school since the pandemic began until earlier this year. Forcing our students to take a Regents Exam after just going back to school a full five date and trying to get accustomed to what is expected and to focus is asking a lot of our students that have been thru enough already. These exams this year will jeopardize whether or not a student receives a Advanced regents diploma or a local diploma because if they sit for these exams and fail, Colleges will be less likely to admit them. I implore you to give our students a year in school to get back into their routine and enjoy school without the worry of failing exams.
145	12/6/21 16:09:18	School Administrator	Strongly Support	I think we should be asking to waive more and at the very least should be adjusting what we are assessing. You say you want kids back in the classroom because of mental health. However, when we come back to the same standardized testing ways and same scope and sequence, we have put more pressure back on students. This is not good for their mental health. This does not give teachers time to focus on the social emotional growth they desperately need. Our kids need time to relearn how to be together, how to collaborate, how to be back in school. You have not adjusted the emphasis standards or the scope of the year to account for remote learning (which was so important for the health and safety of adults). This leaves us trying to push through curriculum faster, to cover everything, which never leads to true learning for students and instead leads to a dislike for learning.

#	Date of Submission	Stakeholder Group	Degree of Support for Waiver	Provided Comment (Note: Items have been redacted to ensure privacy of stakeholders)
146	12/6/21 16:10:00	District Personnel	Strongly Oppose	<p>Exit criteria need to be developed to allow schools with 2 or more years of student achievement and growth documented with a vendor provided nationally norm referenced standardized assessment to exit accountability status prior to the start of the 2022-23 school year.</p> <p>Creating a cohort of "schools at risk of identification" with obligations to participate in school improvement activities is no different from identifying new CSI / TSI schools. Therefore, this proposal should be removed from the waiver request.</p> <p>Funds to support "schools at risk of identification" would be better spent increasing support for current CSI / TSI schools to help them address COVID related learning loss and existing SCEP goals.</p> <p>The commitment that "LEAs will have access to information and resources, such as the school report card and professional development tools, on the NYSED website." should include re-activating the (intentionally disabled) comparison tools built into the NYSED data site.</p>
147	12/6/21 16:16:21	Parent	Strongly Support	I hear it from people all over; principals, teachers, parents, and students. This continues to be another trying year with a lot of gaps to fill. I don't believe this year will be the best to show a "typical school year".
148	12/6/21 21:32:49	Parent	Strongly Support	I noticed a big difference not having regents exams just able to pass each class not have stress and anxiety taking regents was best for my children. also during a pandemic they don't need add stress and anxiety.
149	12/7/21 7:21:30	Principal	Strongly Support	Due to the ongoing pandemic causing inconsistent attendance due to Covid and Covid exposures and addressing the social emotional needs and trauma of the students, testing at this time would cause more duress and yield questionable results.
150	12/7/21 7:27:21	Principal	Strongly Support	The disruptions to this school year are pervasive from vaccine mandates which account for two teachers on leave, to quarantining of students and staff, to the cumulative effect of remote learning academic loss amongst students at no fault to the school community.
151	12/7/21 7:45:19	School Staff	Support	Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In [REDACTED], we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request.
152	12/7/21 7:49:42	Teacher	Strongly Support	Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In [REDACTED], we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request.
153	12/7/21 7:51:54	Teacher	Strongly Oppose	The purpose of the test is to keep the students motivated to study on a regular basis, while it would be awesome for the students to have internal motivation it is external motivation that had the greatest effect. We need to return testing and give students a reason to engage in the education process.
154	12/7/21 7:52:47	Teacher	Strongly Oppose	"Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In [REDACTED] we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request."
155	12/7/21 7:55:09	Parent	Strongly Support	"Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In [REDACTED] we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request."
156	12/7/21 8:01:15	Teacher	Strongly Support	Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In [REDACTED] we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request.

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157	12/7/21 8:06:08	Parent	Strongly Support	I believe these exams are not design to help children. It's to see how teachers and school perform, which should be done another way and not at the expense of children. Children face a lot of mental and emotional stress with in they lives and this test takes a major part in that. All children are not test takers and it's not fair to those who can't perform well but can perform well over all in school and they class work.
158	12/7/21 8:08:24	Teacher	Strongly Support	I have been a teacher in the public school system for 24 years. These past 21 months have been extremely challenging to navigate. As a teacher I thought I always gave more than I could, but the new demands on teaching and learning (and now "learning loss" catch up) are enough to break me. To assign accountability and ranking for matters that are completely out of our control to navigate (despite our repeated endless efforts) will be so demoralizing that you would inevitably cause us to leave the profession in droves. We need more resources to support our students. We need more funding to put programs in place to address particular needs that were created by this pandemic. What we do not need is to be held to the same level of accountability that we were when these challenges did not exist.
159	12/7/21 8:19:48	Parent	Strongly Support	this is a transition year back into in person learning - high stakes testing seems to be counterproductive to traumatized students who need to focus on relearning how to be students vs. stressed about a test
160	12/7/21 8:28:01	Teacher	Strongly Support	"Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In [REDACTED], we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request."
161	12/7/21 8:48:29	Teacher	Strongly Support	Any data collected during this time is not reliable due to the fact that students, teachers and their families have seen a great deal of upheaval at different times during this pandemic. At different points, all may have been exposed to or contracted COVID, have had economic hardships due to COVID or other circumstances that will pull students and teachers away from their normal attention to detail. Decisions with long lasting ramifications can not be made fairly and accurately.
162	12/7/21 8:50:42	Teacher	Strongly Support	Our students have suffered great learning loss due to the pandemic, especially the most vulnerable students. We are working very hard for them to catch them up and we are catching them up, but it will take a while. [REDACTED] was a Federal Blue Ribbon school in 2013 so we don't take this request lightly.
163	12/7/21 8:53:25	Parent	Support	I have a problem of changing ELA teachers for my 6 grader son in [REDACTED] That happen not once or twice That made my son upset !!
164	12/7/21 9:00:20	Principal	Strongly Support	consideration should be made as learning communities are returning from 1.5 remote learning.
165	12/7/21 9:02:03	Teacher	Strongly Support	Please allow students the opportunity to catch up. Teachers are working as hard as they can to overcome the educational deficits of last year's Covid emergency. We are working all day long teaching with masks on (and you should try getting enough breath to teach, engage, and manage classrooms full of children), doing our best to help students learn. We are trying new things, staying up late at night and working on weekends to learn new technology. We are contacting parents and practicing classroom interventions to help struggling students. We are [REDACTED] part of the support community of administrators, counselors, psychologists, social workers, and parents, all trying so hard to help students catch up and even learn HOW to learn. Please give us all a break and some credit for doing our utmost to build success for the children we are trying to help. Grant a Federal Waiver. PLEASE!! We have to believe that help is on the way. Just as our children need to believe someone is looking out for them. All the people mentioned are. Please join us! Sincerely, [REDACTED]
166	12/7/21 9:03:10	Parent	Strongly Support	Using data from the 2020-2021 to effect schools' rating, funding and ability to receive supports is completely inequitable. Especially to those schools supporting minority students.
167	12/7/21 9:11:09	Teacher	Strongly Support	Students did not have enough academic preparation time to be successful in these assessments. They are only now getting re-acclimated to academic settings.
168	12/7/21 9:12:04	Parent	Strongly Support	These tests should never be considered because they do not accurately measure a students true potential, especially if your child has a learning disability, as my son has one. There are other ways to classify a school's success with their students.
169	12/7/21 9:22:32	Parent	Don't Know/No Opinion	I'm more annoyed with the covid shots Happening at my daughters school. It shouldn't happen while my daughter is receiving an education. It should be administered by a medical professional in the same setting in a medical professionals office. It's disgusting my daughter is having nightmares about going to school. That is my opinion
170	12/7/21 9:25:26	Teacher	Strongly Support	If the government is preventing students from attending school due to COVID protocols it is immoral to then hold these students and their districts accountable to the same standards as students are able to attend school. The data is clear, students who are not physically present in school do not perform as well as compared to those who are in school.
171	12/7/21 9:43:28	Teacher	Strongly Support	If the government is excluding kids from school due to quarantine in the covid pandemic, they can't then turn around and hold schools and students accountable.
172	12/7/21 9:46:20	Parent	Strongly Oppose	Stop setting limitations. Get back to normal already
173	12/7/21 9:50:30	Parent	Support	I trust that NYSED knows what is best for our kids and if they are requesting the waiver, then I support their choice.
174	12/7/21 9:52:14	Parent	Strongly Support	Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State must continue to request waivers to federal accountability standards.
175	12/7/21 9:55:06	School Staff	Neither Support nor Oppose	I have no opinion about this issue.
176	12/7/21 10:14:55	Teacher	Strongly Support	Filling in the gaps with students should be the primary focus this year.
177	12/7/21 10:23:34	Parent	Strongly Oppose	Schools and students should be assessed and held accountable. 2021-2022 has felt like a normal year of learning.
178	12/7/21 10:34:08	Teacher	Oppose	Schools, administrators, teachers and students should be held accountable for their performance.
179	12/7/21 11:02:40	School Staff	Strongly Support	I think it is clear by now that we see our students are struggling academically. They are working from being behind and trying to stay current. It has been an emotional year so far and we need time to help our students catch up before we can make them accountable.

#	Date of Submission	Stakeholder Group	Degree of Support for Waiver	Provided Comment (Note: Items have been redacted to ensure privacy of stakeholders)
180	12/7/21 11:19:35	Parent	Strongly Oppose	With or without COVID schools must perform in an adequate level to be able to teach students. Also all schools were in the same situation.
181	12/7/21 11:44:35	Teacher	Strongly Support	<p>Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State must continue to request waivers to federal accountability standards. The information gleaned from student performance data and social-emotional interventions presents an inarguable fact: excluding students from school (Mandated school closure, and quarantines) has had, and continues to have negative consequences for students.</p> <p>Districts across the state have borne the weight of this pandemic since its inception. We have: drastically altered instructional models and interventions to ensure continuity of instruction, fed every child who has required breakfast and lunch in our institutions, developed extensive plans to return students to in-person learning, and retrofitted our facilities and operations to accommodate public health mandates.</p> <p>All are eager to return to normal operations. The question remains: What is the new normal? Grace must be granted while all in the field are still grappling with the answer to this question. It is absolutely appropriate to assess our students to discern the true impact of the pandemic and establish new baselines for accountability. This will take time, patience, courage from our leaders, and most importantly a renewed focus on what is best for our students and staff.</p>
182	12/7/21 11:54:40	Teacher	Support	Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In [REDACTED] we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request.
183	12/7/21 11:57:08	Principal	Strongly Support	I agree with the reason for the waiver. We are STILL in the middle of the pandemic. With quarantines of students causing sporadic attendance and the work that still needs to be done to get parents to support COVID vaccinations, we need more time. The almost two years out of school has been detrimental to urban institutions.
184	12/7/21 12:09:33	Teacher	Strongly Support	Now let's do away with evaluating teacher performance based on the ELA and Math State exams data. It is grossly unfair to rate a teacher's performance at 40% of their students' progress/performance. This year especially, a lot of students fell further behind in academics; my school in particular, has seen a huge influx of newcomers who lack not only basic communication skills in either language, but mathematical foundations as well. What I am saying is, the state must revise its teacher evaluation protocols and remove the ridiculous 40% MOSL.
185	12/7/21 12:34:04	Teacher	Strongly Support	I do not want the results to negatively impact the district or the students in any way!
186	12/7/21 12:43:19	Principal	Strongly Support	Students and staff are just ironing out our wrinkles this year. We are dealing with so much as are the students, to use test scores as a means of rating seems unfair.
187	12/7/21 13:00:57	School Administrator	Strongly Support	This year has many challenges and despite very noble intentions being asked to be accountable for testing is extremely difficult this year. There are too many variables that are beyond the normal school year that we cannot account for.
188	12/7/21 13:06:23	Parent	Support	Kids have been under a great deal of stress as well as teachers. I think each child and teacher can't be expected to cope and learn as well as all other children.
189	12/7/21 13:07:27	Parent	Strongly Oppose	<p>I strongly oppose the proposal.</p> <p>The schools MUST BE ACCOUNTABLE for the results they achieved, or not</p> <p>Last school year was equally difficult for all the parties involved. However, each school reacted to the changes differently. Accountability is the key in promoting healthy change that works!</p>
190	12/7/21 13:14:00	Parent	Strongly Oppose	My child will NOT be subject to this ridiculous "vaccine" that we do not know the long term effects to. What happened to MY BODY MY CHOICE. This is absolutely ridiculous that it is even a thought that we would have to put our kids through all of this that has been going on!
191	12/7/21 13:22:50	Parent	Strongly Oppose	I would like a longer duration and more studies of vaccination administered to kids of my child's age group before I subject my child to receiving vaccination. I also strongly do not believe any child should be turned away from a public education if not vaccinated.
192	12/7/21 13:24:57	School Staff	Strongly Support	<p>Until the pandemic ends for all parts of NY, SED must continue to request waivers from federal accountability standards. The information gleaned from student performance data and social-emotional interventions presents an inarguable fact: mandated school closures, remote learning, interrupted learning and quarantines have had negative consequences and continue to impact learning.</p> <p>Districts across the state have borne the weight of this pandemic since it began. We have drastically altered instructional models and interventions to ensure continuity of instruction. We have fed every child who has required breakfast and lunch in our institutions. We have developed extensive plans to return students to in-person learning and we have retrofitted our facilities and operations to accommodate public health mandates.</p> <p>All are eager to return to normal operations yet the question remains, "What is the new normal?" Grace must be granted while all in the field are still grappling with the answer to this question. It is absolutely appropriate to assess our students to discern the true impact of the pandemic and establish new baselines for accountability. This will take time, patience, courage from our leaders, and most importantly a renewed focus on what is best for our students and employees.</p>
193	12/7/21 13:39:12	Parent	Strongly Support	The kids, teachers, parents, and administration have had it hard enough the last two years. They need this break.
194	12/7/21 13:40:54	Teacher	Strongly Support	I feel it to be unfair to use last year's data based on individual needs/hardship due to the pandemic/social and emotions concerns students went through, as well as loss of friends and family members due to the virus.

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195	12/7/21 14:03:58	Parent	Strongly Support	Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In [REDACTED], we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request."
196	12/7/21 14:17:32	Parent	Strongly Support	Moving forward I hope we can propose more comprehensive measures than merely test scores. There continue to be inequities and flaws with this process, which were exacerbated by the pandemic and abundantly clear in the test results from spring of 2021.
197	12/7/21 14:17:52	Teacher	Neither Support nor Oppose	Evaluating students' skills are important and educators need the information.
198	12/7/21 14:20:14	Teacher	Strongly Support	There is a huge academic gap due to pandemics so I strongly support waiving Regents.
199	12/7/21 14:22:31	Parent	Strongly Oppose	Absolutely not, I'm not going to and neither are my kids!
200	12/7/21 14:38:12	Student	Support	.
201	12/7/21 14:47:38	Teacher	Strongly Support	Using student data from this school year to make a judgement on anything especially teachers I think is TOTALLY unfair, especially knowing that with the pandemic and many students not having available to them the resources to flourish academically affected what they did or didn't learn last year.
202	12/7/21 15:06:40	Parent	Strongly Support	For the last two years life for students has been constantly disrupted, academic testing should not be something they, or the district, is worrying about.
203	12/7/21 15:23:52	Parent	Strongly Oppose	Our public schools must be accountable to parents, students, and taxpayers in upholding standards in delivering high quality education to all students, in particular ELLs and SWD. We cannot let our school system off the hook for another year when studies are coming out to show the harm that school closures and other COVID policies have had on students. We will not be able to address the shortcomings if we are not holding our school system accountable to metrics and consequences.
204	12/7/21 15:31:19	Principal	Support	N/A
205	12/7/21 15:53:55	Parent	Strongly Support	No thank you.
206	12/7/21 16:09:27	Parent	Strongly Oppose	As a Scientist, I STRONGLY believe every single person who medically CAN get vaccinated SHOULD get vaccinated. The amount of research that is already put into vaccines and vaccine development is FAR BEYOND what most people understand or comprehend. This vaccine saves lives. This vaccine, although it will not fully stop transmission rates, it GREATLY reduces them, and SIGNIFICANTLY reduces a person's chance of being hospitalized due to COVID. There is ZERO reason for others not to get vaccinated. It protects me as an innumo-compromised individual, it protects members of my family who have a lung disease, and it protects the elderly, and children (who are most vulnerable). Misinformation regarding this vaccine is rampantly spreading, but the FACTS are that this vaccine WORKS. The research and scientific data BACK THIS UP. Just get vaccinated and save yourself and others. No waiver needed.
207	12/7/21 16:24:09	Parent	Strongly Oppose	It's gonna be like the common flu shot no need to do this measure for something that your gonna need every year
208	12/7/21 16:30:12	Parent	Strongly Oppose	The city and the state should be held accountable for our children's education! We as the tax payers pay for our kids' a education and we want a quality education
209	12/7/21 17:00:32	Parent	Strongly Oppose	Allowing the waiver allows adults in whom students have trusted to completely betray & abandon their responsibility to ensure students can learn & demonstrate their learning in an objective manner.
210	12/7/21 17:01:21	Parent	Strongly Oppose	It is ridiculous to have no accountability determinations. You people should be fired.
211	12/7/21 17:20:45	School Administrator	Strongly Oppose	The waiver is absurd. It is a purely political decoration. If any effect, it is negative impact on every student. I urge DO E stop playing too much dirty politics in education.
212	12/7/21 17:47:50	Parent	Strongly Oppose	We need scores and etc to gauge success.
213	12/7/21 18:18:04	Parent	Strongly Oppose	Stop messing up the education system. You are doing a disservice to our kids.
214	12/7/21 18:18:30	Parent	Strongly Oppose	For 2 years, NYC state tests were waived so we do not know how our public school children are doing in terms of academics. How do I help my daughters if I do not know where they score on the state test? Not knowing us NOT bliss! My children deserve to know if they need help. Do not allow test to be waived this year.
215	12/7/21 18:28:32	Parent	Strongly Oppose	Since 2013 EASA has been filing for the waiver asking for grants improve schools. However part of closure was to close schools and move students to higher performing schools causing over crowding. We need to build more schools. The programs are there for community support however schools are crowded and changing a program and calling kids data will not change the fact we need educational accoutability not only more fund distributed to programs that are overcrowded.
216	12/7/21 19:18:16	Principal	Strongly Support	The pandemic is not over. Learning is still being interrupted by the need to quarantine. Students, staff, and families have been navigating a constantly changing situation that impacts every part of their lives. The current cohort of 3rd grade students were in Kindergarten the last time they had a full year in school without COVID. Next year, elementary schools will begin implementing tests based on the next generation standards for the first time. Holding off on giving State tests until we roll out the new exam provides an opportunity for setting a more accurate baseline, and giving schools a chance to see and respond to the changes in a manner that is thoughtful. Administering State Tests and returning to full accountability this year, does not create a culture of care for students and staff that need the support of leaders in this time more than anytime before.

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217	12/7/21 19:38:33	Teacher	Strongly Support	I support the waiver due to how Covid 19 continues to impact the lives of our students. Students had their learning interrupted the past two years and continue to have their learning interrupted by mandatory quarantines. We are trying to fill the previous grades learning while building on the current year's standards. If that isn't difficult enough our students are fearful and anxious of the toll this disease is taking on their families. Administration, counselors, and teachers are doing all we can to support the academic and social emotional needs of all our students. I am in full support of the waiver. As we continue to use assessments, they should only be used for gap filling purposes until we have consistent attendance that is not interrupted for things that are beyond our control.
218	12/7/21 19:58:16	Parent	Strongly Oppose	Restore accountability.
219	12/7/21 19:58:27	Principal	Strongly Support	Coming off of quarantine, it is unfair to use a pre-COVID system of accountability. It is tone-deaf to the traumatic experience that we are enduring as a country. Our schools communities have been focused on trauma-informed instruction, and rebuilding community. What are we measuring and why at this time?
220	12/7/21 20:26:12	Parent	Strongly Oppose	How can we measure learning loss without diagnosing it first? It is critical for the DOE to see how much loss has accrued over the past few years to figure out a response at the state level.
221	12/7/21 20:35:24	Parent	Strongly Oppose	I am Strongly Oppose" to the waiver.
222	12/7/21 20:41:22	Parent	Strongly Oppose	This is ridiculous
223	12/7/21 20:48:42	Parent	Strongly Oppose	It's not fair for our kids.
224	12/7/21 21:04:15	Parent	Strongly Oppose	This waiver will only hurt students! How come education department comes out with such unwise idea? Please do your job and improve the schools and education quality!
225	12/7/21 21:07:59	Teacher	Strongly Support	I agree that schools in the area where I work have been and continue to be at a disadvantage when it comes to funding and enrichment opportunities for our students. As a result, many of our students are lagging when compared with students in more affluent communities.
226	12/7/21 21:43:28	Parent	Strongly Oppose	Strongly strongly oppose.
227	12/7/21 21:47:37	Parent	Strongly Oppose	Strongly oppose
228	12/7/21 22:04:12	Parent	Strongly Support	School has a lot of substitute tutors who are just filling in since there are no teachers available for daily routine to complete the academic year successfully
229	12/7/21 22:15:18	Parent	Strongly Oppose	We need accountability
230	12/7/21 22:21:47	Parent	Strongly Oppose	2021-2022 school data should be considered
231	12/7/21 22:22:38	Parent	Strongly Oppose	
232	12/7/21 22:23:39	Parent	Strongly Oppose	2021-2022 school data should be considered
233	12/7/21 22:25:59	Parent	Strongly Oppose	not acceptable
234	12/7/21 22:28:50	Parent	Strongly Oppose	Stupid proposal ever,silly waste of time and money
235	12/7/21 22:32:41	Parent	Strongly Oppose	To whoever made such request: Shame on you ! Education Department is responsible for improving our kid's education. If you want the Federal fund, you should be held accountable for the outcome. If you can't do that, just quit from your position.
236	12/7/21 22:35:50	Parent	Strongly Oppose	How can you know where find are needed of there is a waiver of accountability for performance? That's absurd
237	12/7/21 22:41:39	Parent	Strongly Oppose	If employees' performance is evaluated for the 2021-2022 fiscal year, so should be students' performance.
238	12/7/21 22:44:28	Parent	Strongly Oppose	
239	12/7/21 22:45:05	Parent	Strongly Oppose	Please Do the best for our children !!!
240	12/7/21 22:47:41	Parent	Strongly Oppose	I completely disagree, because I believe that students should be held accountable for their grades. If we implement this bill, then student's grades would encourage students to not do well in school. This way, they still have a chance to attend a school is not the right level for them.
241	12/7/21 22:58:46	Other	Strongly Oppose	Everyone should be responsible for their work and every work should be evaluated! This proposal is basically saying: just give me the money and don't ask me for anything. Shame on you!
242	12/7/21 23:15:41	Parent	Strongly Oppose	Mayor Bill De Blasio closed the in person schools for 5 months last year, for no good cause, and when Covid rates were dropping in NYC. School was entirely remote for middle and high school. There were no assessments in classes. Parents had to grade their child's work. NY Suburban schools, charter schools, private schools, parochial schools all figured out how to have rigorous education in person, with routine tests and assessments. My elementary aged child did not have a reading assessment for 18 months. Shame on the DOE for such learning loss. And this year, if a child has a mandatory quarantine from a Covid exposure, they can be out of school up to 10 days, and there is no education provided to the child in the home when they miss school due to exposure. None. And the child is marked as absent. Each and every day. We experienced this first hand. Shame on De Blasio and his administration for not taking education seriously in our city.
243	12/7/21 23:21:15	Parent	Strongly Oppose	this request does not make any sense !!!
244	12/7/21 23:33:34	Parent	Strongly Oppose	That is not reasonable
245	12/7/21 23:47:36	Parent	Strongly Oppose	N/A
246	12/8/21 4:11:15	Parent	Strongly Oppose	What's happening during the 2021-22 school year shouldn't just be ignored. It's a direct reflection of schools' current statuses & how they have been impacted by the pandemic. Old data from prior years will not be adequate in assessing current needs & creating new solutions.
247	12/8/21 4:15:39	Parent	Strongly Oppose	strongly oppose.
248	12/8/21 5:00:34	Parent	Strongly Oppose	School is the key place for kids to get better education. Therefore the quality of the education is essential for school. the waiver request here is equal to not requesting to heal patients in hospitals, which is not acceptable.

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249	12/8/21 7:26:45	Parent	Strongly Support	The last 2 years have been so tough on all of us. These kids are trying their absolute best, but they are still kids. The added pressure is not helping anyone's mental health. Students or teachers alike.
250	12/8/21 7:38:12	Parent	Strongly Support	Students missed a year of learning because remote learning as a whole did not work.
251	12/8/21 7:59:33	Parent	Strongly Support	"Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In [REDACTED], we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request."
252	12/8/21 8:10:26	Teacher	Strongly Support	I feel like it is unfair to use data from the state tests to assess our students, schools, and teachers. Our students have been negatively impacted greatly by COVID19 and are still feeling the impacts. Each district, community, school, and family has been impacted in various ways, to various degrees. It is not feasible at this time to truly and fairly assess anyone based on test scores due to the affects of COVID19 over the last two years, and the affects that we are still experiencing to this day.
253	12/8/21 8:23:12	Teacher	Strongly Support	As a special education teacher, I've noticed that while in the past, students have been 1-2 grade levels behind. This year the gap is so much larger. Students are coming in 3 or 4 grade levels behind so that teaching content has been very difficult.
254	12/8/21 9:11:27	Parent	Strongly Oppose	No pain no gain. Life is not easy, but we need work harder!
255	12/8/21 9:37:17		Strongly Oppose	Please respect for all the people and schools who work hard.
256	12/8/21 9:59:57	Parent	Strongly Oppose	[REDACTED]
257	12/8/21 10:02:48	Parent	Strongly Support	Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In [REDACTED], we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request.
258	12/8/21 10:15:10	Parent	Strongly Oppose	Can I get pay from my boss ,without my boss question me about what did I do in the job ? Did I doing a good job or bad job?
259	12/8/21 10:28:39	Parent	Strongly Oppose	Schools and subgroups of students should be accountable based upon all available data, and Title 1 funds must be apportioned based upon the current needs of students in our school system.
260	12/8/21 10:35:58	Parent	Strongly Oppose	Without goals, plans and hard work no success.
261	12/8/21 10:47:54	Parent	Strongly Oppose	You want to get money and no work performance? GTFOL!
262	12/8/21 10:56:43	Parent	Strongly Oppose	If you don't need an exam, who will study hard? How can this country compete with other countries?.
263	12/8/21 11:13:01	Teacher	Strongly Support	The Children would do poorly to any state test, regents, ect... due to over a year and a half of lack of direct learning. There are several socio-emotional concerns that have colored my wanting testing to continue. The waiver to opt out is still unfortunately necessary
264	12/8/21 11:36:27	School Administrator	Strongly Support	N/A
265	12/8/21 11:59:39	Teacher	Strongly Support	Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State must continue to request waivers to federal accountability standards. The information gleaned from student performance data and social-emotional interventions presents an inarguable fact: excluding students from school (mandated school closure, and quarantines) has had, and continues to have, negative consequences for students. Districts across the state have borne the weight of this pandemic since its inception. We have: drastically altered instructional models and interventions to ensure continuity of instruction, fed every child who has required breakfast and lunch in our institutions, developed extensive plans to return students to in-person learning, and retrofitted our facilities and operations to accommodate public health mandates. All are eager to return to normal operations. The question remains: What is the new normal? Grace must be granted while all in the field are still grappling with the answer to this question. It is absolutely appropriate to assess our students to discern the true impact of the pandemic and establish new baselines for accountability. This will take time, patience, courage from our leaders, and most importantly a renewed focus on what is best for our students and staff.
266	12/8/21 12:00:01	Parent	Strongly Oppose	Schools and subgroups of students should absolutely be accountable based upon all available data, and Title 1 funds must be apportioned based upon the current needs of students in our school system. It is time to stop using COVID19 as an excuse for everything.
267	12/8/21 12:58:09	Parent	Strongly Oppose	All the kids, smart kids should be treated differently and reward more to explore more than talent and genius children for this world and society
268	12/8/21 13:09:40	Teacher	Strongly Support	We are trying desperately to catch students up. As a third grade teacher, I have some students who did not attend school from March of 2020 until September of 2021. Therefore, there are still at a kindergarten/first grade level. These students are making gains, but will not catch up in time to be proficient on an exam, and this is not the fault of the school or staff.
269	12/8/21 13:20:14	Parent	Strongly Oppose	Schools must be held accountable based upon all available data. Title 1 funds should be apportioned based upon the current needs of students in our school system.
270	12/8/21 13:30:06	Parent	Strongly Support	Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. Until everything is allowed to transition back to normal, I support the waiver request.

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271	12/8/21 13:36:42	Student	Strongly Support	Too many people are more likely to be infected with COVID-19 in an examination room, and we are afraid that we will not be able to go to school. And we don't know if the person taking the test has been given an injection or has been in contact with a positive patient. It is also unfair to not allow people who have not received injections to take the test. The best way is to cancel the test. And my mother is also nursing, and I can't let the virus spread to more people. Moreover, wearing masks affects everyone's exam status. We will feel unable to breathe and need to wear it for a long time. This will make me feel uncomfortable and unable to take a normal exam. This is irresponsible for my future. It will make my dream impossible.
272	12/8/21 14:06:53	Parent	Strongly Oppose	No one will improve the quality of education if waiver applies. We need to find the problems and fix it. Never never escape all the responsibilities!
273	12/8/21 15:07:14	Other	Strongly Oppose	No pain no gain
274	12/8/21 15:23:38	Parent	Oppose	Students returned to school in person in 2021-2022 . the school/teachers /students performance should be accountable and consider as useful data
275	12/8/21 15:43:50	Teacher	Strongly Support	As a teacher, I know that the students I see every day do not have the knowledge or maturity level that was normally demonstrated pre pandemic. We need to give students, teachers, schools, and communities a break from former expectations until we see a return to levels we were experiencing prior to 2020.
276	12/8/21 15:47:31	Parent	Strongly Support	I work in higher education and it's become regular practice to discount data from academic years spanning the pandemic since they are not representative of a normal business. I imagine this same issue would hold true for K-12 as well.
277	12/8/21 15:47:54	Teacher	Strongly Support	We are still trying to make up for the many deficiencies that have resulted—and are resulting—from teaching and learning during a pandemic. Schools are in need of support, not punishment, and should not be held accountable for the effects of the pandemic.
278	12/8/21 15:58:18	Parent	Strongly Support	Schools should not be assessed by performance in the wake of COVID, and students should not be assessed by their performance either (in other words, Regents exemption should continue for the 21-22 school year.)
279	12/8/21 16:00:37	Teacher	Strongly Support	Educators are working very hard every day to tend to the social emotional and academic needs of the students. A lot of learning time was lost last school year and we need to lift this unnecessary pressure off of schools at this unique moment in time.
280	12/8/21 16:19:07	Parent	Oppose	All data should be considered when public funds are being utilized. Under no circumstances should any decision regarding the due process be circumvented by withholding such data.
281	12/8/21 16:29:02	Parent	Support	Fix boys bathrooms so they feel more comfortable using the bathroom. Like my son and others in his class have daily accidents too afraid to pee in front of other boys using urinals
282	12/8/21 16:32:21	Parent	Strongly Oppose	If funding is used, measures and data should be used to identify accountability.
283	12/8/21 16:38:34	Union Leader/Representative	Strongly Support	Since the pandemic has hit our schools, communities, families, and inparticul our children have been heavily impacted by state and federal requirements and regulations. Our children need social contact, interaction with other kids and teachers, sports, etc. to thrive and be their best. In my opinion, enough is enough as we all need to get back to life normality, especially our children. There are ways to work through the pandemic impacts outside of constant solitude, quarantine, and hard restrictions. We highly support the waiver for our schools to be eligible o apply for the grant and be independent to not be judged based upon the pandemic timeframe as this is NOT a true evaluation of student or school performance.
284	12/8/21 16:44:17	Parent	Strongly Support	Since the pandemic has hit our schools, communities, families, and inparticul our children have been heavily impacted by state and federal requirements and regulations. Our children need social contact, interaction with other kids and teachers, sports, etc. to thrive and be their best. In my opinion, enough is enough as we all need to get back to life normality, especially our children. There are ways to work through the pandemic impacts outside of constant solitude, quarantine, and hard restrictions. We highly support the waiver for our schools to be eligible to apply for the grant and be independent tonmske choices verses mandates and intervention. Our students and schools should not be evaluated based on the pandemic timeframe as this is not an accurate evaluation of our students or schools.
285	12/8/21 16:54:22	Parent	Neither Support nor Oppose	Honestly have no idea what's going.....
286	12/8/21 17:04:22	Parent	Support	Everyone needs a year to get used to school again.
287	12/8/21 17:08:32	School Staff	Strongly Support	COVID-19 has impacted students in a profound way. While my district is back to full-time in-person learning, the negative impact of COVID is long lasting. Additionally, mandatory quarantines due to infection or close contact continue to dramatically impact student performance in a negative way.
288	12/8/21 17:36:27	Parent	Strongly Support	This year we need to focus on the needs of our children first. Many of our children are suffering terribly from the continuing pandemic and we know that this will impact test scores. The legislation that led these policies is also defective and needs to be corrected. Thank you.
289	12/8/21 17:51:20	Parent	Neither Support nor Oppose	Please do what's best for our school district and our children's educations.
290	12/8/21 17:54:25	Parent	Don't Know/No Opinion	I would like our district to support what's needed for our children's educational needs.
291	12/8/21 18:20:04	Teacher	Strongly Support	The students are trying to get back on track and relearn things that they forgot! We're focusing on getting our students back on track and students are already overwhelmed. They need time to integrate themselves and adjust in schools. I can't imagine schools doing super well with a year and a half gap.
292	12/8/21 18:30:27	Parent	Strongly Support	It has been a difficult couple of years for everybody and schools shouldn't be any different. They did their best with what is available however they shouldn't be judged not this year
293	12/8/21 18:37:50	Parent	Strongly Oppose	Schools need to be assessed so additional support can go to the schools that are struggling. Instead of a punitive approach you need an uplifting approach. The kids need quality schools; the teachers need more support.
294	12/8/21 18:40:11	Parent	Strongly Oppose	Receiving fund without accountabilities? NO!
295	12/8/21 18:47:44	Parent	Strongly Support	We're still living through Covid times, with students quarantining and being impacted but Covid as the associated rules/regulations. I believe in accountability however in these times getting a true/accurate measure will be challenging.
296	12/8/21 19:08:40	Parent	Strongly Oppose	Totally non-sense!
297	12/8/21 19:17:04	Parent	Strongly Oppose	We need safety
298	12/8/21 19:18:20	Student	Strongly Oppose	Safety
299	12/8/21 19:19:02	Student	Strongly Oppose	Safety
300	12/8/21 19:19:37	Student	Strongly Oppose	Safe
301	12/8/21 19:20:07	Student	Strongly Oppose	Safe
302	12/8/21 19:27:48	School Administrator	Strongly Support	People making decisions in Albany must take into consideration all that has impacted the education system during this pandemic, especially our neediest families.

#	Date of Submission	Stakeholder Group	Degree of Support for Waiver	Provided Comment (Note: Items have been redacted to ensure privacy of stakeholders)
303	12/8/21 19:55:12	Parent	Strongly Oppose	<p>Everyone had a full year run of life with Covid restrictions. Those whose response and academic output continued to wane into the 21/22 campaign should be scrutinized heavily because I feel that failure at this point is not an option and the status quo of children learning remotely and rarely seeing their classmates' faces needs to end.</p> <p>To that, I also know that older buildings didn't stop crumbling and cease needing improvement during said year. Let us please examine and determine what can create the best environment moving forward for our children now; not with data based in a year that feels terribly distant now.</p>
304	12/8/21 22:11:19	Teacher	Strongly Support	Students have had a difficult past two year due to covid, trauma and "inconsistent" learning. This year needs to serve as a "probationary" year where students can adjust to the reality of school. There were students who were not joining classes last year for various reason and were nonetheless moved to the next grade. A state test this year would be an added stressor for the children, especially for those that for whatever reason could not keep up during the pandemic.
305	12/8/21 22:34:18	Parent	Strongly Oppose	We need accountability and find root cause to rectify and not excuses and waiver.
306	12/8/21 23:42:56		Strongly Oppose	As a parent, I would like to see transparency from [REDACTED] about all public schools' performance. Otherwise, the challenging schools cannot improve.
307	12/9/21 5:40:39	Other	Oppose	The Covid pandemic has had a dramatic negative impact on our students. Studies show that that there has been up to a 23% degradation on all students education performance which to me is a crisis. This impact needs to be assessed in providing funds and how they are used.
308	12/9/21 7:03:04	Parent	Neither Support nor Oppose	Our students need help. Some districts were able to support and perform better than others. We need some true and accurate data to show how far behind some of our districts really are.
309	12/9/21 7:16:44	Parent	Strongly Oppose	Oppose
310	12/9/21 7:24:11	Parent	Strongly Support	Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In [REDACTED] we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request.
311	12/9/21 7:29:16	Parent	Strongly Oppose	Strong oppose this proposal as student should study hard and have good achievements otherwise they don't need go to school
312	12/9/21 7:46:04	Teacher	Strongly Support	The accountability flowchart was not made for this: pandemic time not being able to test and the waiver situation.
313	12/9/21 9:46:23	Parent	Strongly Support	<p>I strongly support the waiver request because from the start of this public health crisis, our government failed to provide accurate information or helpful direction; and, as a result, school systems were left to meet the daunting challenge with little to no resources.</p> <p>Initially: NYS School Districts were forced to manage through the pandemic with little to no support in the Spring of 2020. We were lucky because our school district did not wait for direction; and instead, our staff empowered themselves to dramatically change instructional models and interventions to ensure instruction continued in spite of the early confusion at the start of the pandemic. In parallel, with the newly created and implemented delivery model, our school district retrofitted facilities; and, changed operations to ensure our students' health and safety, when doors were allowed to re-open. And finally, our school district developed and shared the effective changes made to support a turn-key, in-person learning plan which included a speedy return to in-person classrooms. And so, it was not a surprise, when our district provided successful endings to these unprecedented school years.</p> <p>Since the start of the 2021-22 School Year: Our school district opened both schools and all classrooms to full time, in-class room instruction; and, on time. And, in light of the educational and mental health concerns, our Administrators, Teachers, Teaching Professionals, and Staff have rigorously used student performance and social-emotional intervention data in conjunction with the new, test and stay in the classroom option, to help student close educational and social gaps as well as avoid new, negative quarantine side effects. Lastly, throughout our district, a supportive masking culture exists and in includes things like mask breaks, etc.</p> <p>In closing, as a parent, I support using my children's' (6th Grade twins, age 11), state test results and information to guide local instruction only. A return to "normal" needs to be postponed until we can define "it".</p> <p>Sincerely, [REDACTED]</p>
314	12/9/21 10:27:48	Parent	Strongly Oppose	<p>No evaluation bring in corruption, waste and unfairness to the teachers and students.</p> <p>We need evaluation and accountability</p>
315	12/9/21 10:36:25	Parent	Strongly Oppose	Not agree with this policy
316	12/9/21 10:43:07	Student	Strongly Support	I strongly support
317	12/9/21 10:43:40	Student	Support	nothing

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318	12/9/21 10:57:39	Principal	Neither Support nor Oppose	Although this policy may be labeled as "accountability", there is truly no real accountability in the current policy. There is no grounds nor sound data-based educational reason to punish schools for the results of sub-groups' performance from four to five years ago. If the purpose of the waiver is to leave schools in purgatory so some people can point to their being lists of TSI and CSI schools in existence, then I do not support the waiver. If the purpose of this waiver or other actions is to reset the system and try to actually determine which schools currently need support, then I support the waiver. It is ridiculous to attempt to explain away why schools identified from years ago require oversight masquerading as support.
319	12/9/21 11:14:59	Principal	Strongly Support	We have such huge educational gaps that we are trying to close, but having the APPR loom over our teacher's heads is very discomfoting and unrealistic. I also ask that NYSED reconsider allowing parents to "opt out" of state testing in the future or REMOVE the 95% attendance criteria for state tests out of the APPR School Report Card. We try to hold forums to explain the state assessment to convince parents to allow their children to take the test, so it is VERY UNFAIR when schools are scored on this and we can't "make" them take the test. NYSED can't have it both ways.
320	12/9/21 11:35:51	Principal	Strongly Support	Government officials have a clear misunderstanding of what goes on in a school on a daily basis. I am in full agreement that schools need to be held to a certain standard. But standards that are reachable and obtainable. For example: Schools can be considered in need of improvement for attendance. We have no control over attendance of students this year as students are quarantined from an outside agency for numerous weeks. Depending on DOH regulations a student could be out on quarantine for up to 20 days. Also we are held to a testing standard where our our Education Department allows parents to OPT OUT and then schools get hit with a need improvement label for students not participating in the testing! HUH? Schools are held accountable for the same sate testing that we don't get data back on for 4 months? HUH? I have been in education for almost 25 years, 16 of them being a principal and it is the same story for the past 20 years. NOTHING HAS CHANGED EXCEPT FOR THE DEMANDS PLACED ON SCHOOLS. State and governmental officials need to understand what we have! We have a beautiful Lamborghini with a Volkswagen engine. But instead of fixing the engine we keep adding on heated seats, the ability to parallel park by itself and wifi yet we still have a Volkswagen engine. But the sad part is we are proud of that and promote the heated seats and the wifi. HUH? Lets look past the shiny new things and refocus on the basics.
321	12/9/21 12:29:43	Teacher	Strongly Support	"Districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. In [REDACTED], we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request."
322	12/9/21 12:48:58	Student	Strongly Oppose	Unbelievable
323	12/9/21 13:04:55	Teacher	Support	As a teacher, I am spending a great deal of time making up for the learning loss of the past 18 months while also teaching new material. It would be unfair to hold the classes and the school accountable this year and perhaps the next several years.
324	12/9/21 13:52:03	Other	Strongly Support	There is no valid comparison to be made from 2021-22 data, given the upheavals of Covid-19.
325	12/9/21 13:53:08	Teacher	Strongly Support	Due to hardships caused by the pandemic, I strongly support this waiver on making any sort of determinations using assessments in these grades.
326	12/9/21 14:38:28	Principal	Strongly Support	Simply put, I can't think of one reason why we would administer the state assessments this year. The reasons are so obvious that there is no need to express them.
327	12/9/21 14:58:23	Parent	Strongly Oppose	Taking away the thermometer does not HIDE the patient's illness.
328	12/9/21 15:08:33	Superintendent	Strongly Support	It is critical for the USDoE to allow the flexibility needed for the NYSED and local school districts to support our children move through the pandemic as we did in the previous years impacted by the pandemic. We are still dealing with the pandemic - illness, economic challenges, reentry challenges and learning gaps. Our children and communities need more time to heal. Thank you for allowing our voices to be heard and for your hard work and leadership on behalf of our children and communities.
329	12/9/21 15:30:09	Assistant Superintendent	Strongly Support	The accountability measures were put into place at a time when it was clear how schools ran; there was a way to measure what was being implemented. COVID has not allowed us to do anything the way we used to and therefore we cannot be held accountable for a system that we just are not implementing at this time.
330	12/9/21 15:37:11	Principal	Strongly Support	While I am a person who is in agreement that accountability is important, the trauma and social emotional impact has had such an incredible impact on our students. We need time to address these issues in order to recreate learning environments and behaviors for learning that will help to address the learning gaps of our students. To be honest, recovery from this pandemic is going to take 3-5 years. We need support to make this happen and not punishment.
331	12/9/21 15:44:37	Superintendent	Strongly Support	I feel that still, at this time, we are not only "catching up" but we are concentrating more on the mental well-being of students and staff. Putting this aside, for now, makes the most sense to me and I'm sure many of my colleagues would agree. Thank you.
332	12/9/21 16:32:42	Superintendent	Strongly Support	Given all the stressors impacting both students and staff in terms of teaching and learning it just does not make sense at this time to add accountability back into this equation at this time. Once COVID quarantines and protocols are lifted then I think schools can get back on their feet.
333	12/9/21 17:09:12	Teacher	Strongly Oppose	Students and teachers need accountability. Having another year without state assessments discourages hard work and is a cop-out. When we test students we will see on a larger scale how the COVID regulations and virtual learning has truly affected them. Students are out future and we need to do everything in our power to keep them in school and prepare them for the real world they are going to be trust into.
334	12/9/21 17:33:08	Superintendent	Strongly Support	The last two year's test results should NOT be used to make any decisions on accountability for districts and schools. We are in a pandemic and there has not been any consistent instructional model. Students have had an interrupted educational experience the past two years. We need to get our students and staff in a good mental state in order before we put accountability measures back in place and we need to get out of the pandemic.

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335	12/9/21 17:42:39	Other	Strongly Support	I visit many schools in order to provide professional development for science teachers to transition to the next generation learning expectations. Students are very far behind in reading, math and academic skills in general. More troubling is that teachers are exhausted and trying to teach grade level material while remediating kids to catch them up along with providing support for students quarantined or absent for other reasons. I request that you consider any measures to relieve the pressure our teachers and students are under so that they can work together to regain some of the learning loss.
336	12/9/21 18:07:00	Parent	Strongly Support	Our children endured drastic change which affected both their emotional and academic well being. Even children who were above grade level suffered deficiencies in some way due to the challenges of isolation, remote learning or social emotional impacts. This needs to be taken into consideration when making decisions for funding and there should not be any thought of reducing funding, programs or assistance.
337	12/9/21 18:25:23	Assistant Superintendent	Don't Know/No Opinion	Due to COVID schools have remained in an accountability status with no ability to appeal. I would like to see all schools as a result of COVID obtain Good Standing. If not, schools should have the right to appeal their accountability status. Funds should not be reduced for any CSI or TSI schools and be given to schools at risk of being identified. I would support this only if it did not reduce the funding given to CSI and TSI schools.
338	12/9/21 19:04:27	Principal	Strongly Support	There has been so much talk about reimaging schools, and confronting the stark racial inequities that the pandemic has laid bare. Our schools are all operating in new and unchartered territories. It is foolish to think old measurement tools (which, let's be honest, were always limited by racial bias and academic elitism) would be relevant in the new contexts of learning.
339	12/9/21 19:57:24	District Personnel	Support	While accountability designations should not be considered while we are still dealing with the negative impacts of COVID-19, NYSED needs to reformulate their ESSA Plan. The current ESSA Plan does not work. Chronic absenteeism is essentially meaningless with kids missing school due to quarantines and isolations. Regents exemptions have also made secondary accountability almost impossible to calculate. But NYSED needs to come up with an alternative. We can't just ask for waivers without an alternate plan.
340	12/9/21 21:19:16	Parent	Strongly Oppose	
341	12/9/21 21:44:19	School Administrator	Strongly Support	.
342	12/9/21 21:44:54	School Administrator	Strongly Support	Students suffered tremendously last year. The system is not ready to return to the pre-pandemic accountability measures. Doing so would help no student.
343	12/9/21 21:49:52	Parent	Strongly Oppose	Are we trying to cover a broken bone with a band-aid? How is it going to heal properly?
344	12/9/21 21:52:49	Parent	Don't Know/No Opinion	I really don't understand what this asking.
345	12/9/21 22:03:34	District Personnel	Strongly Support	As we continue to navigate our way through this pandemic, students, families and those adults who work with them, are trying to aid in recovery from trauma while recovering from trauma themselves. Academic progress is a primary focus of the school system, this cannot be minimized or denied. We must also acknowledge however, that individuals dealing with trauma must first feel safe and comfortable physically, socially and emotionally in order for Academic progress to take place. To judge students and school systems around Academic progress while they are still reeling from the effects of this pandemic is not only unfair, it is cruel to everyone who is trying to support individuals who have been deeply scarred and who have been unable to live "normal" lives for almost 2 years. I respectfully ask that NYSED submit this waiver request and that it is granted.
346	12/9/21 23:15:26	Parent	Strongly Oppose	This is a ridiculous and completely unnecessary waiver that will bring further disarray to already quite low education standards
347	12/10/21 0:02:08	Parent	Strongly Oppose	I believe the current needs of students needs to assessed and there must be accountability
348	12/10/21 6:07:23	Principal	Strongly Support	The Pandemic constantly disrupting education due to student illness, class closures, staff illness. Students do not have a fair opportunity.
349	12/10/21 7:30:06	Parent	Strongly Oppose	The second regents were cancelled the teachers in my daughter's school stopped teaching.
350	12/10/21 7:46:01	Assistant Superintendent	Support	We are a TSI District and Middle School. We made our first year of progress before COVID hit and were confident that we would make our second year of progress and be removed as TSI school. Unfortunately, we have not had that opportunity and continue to be identified. Can you create a process so that TSI schools who made their first year of progress can appeal to be removed from the TSI list?
351	12/10/21 7:50:36	Parent	Strongly Oppose	We need this info to know how to help students
352	12/10/21 7:54:19	Principal	Strongly Support	The pandemic has shined a bright light on many of the issues that have already existed with this accountability system. Student attendance is down due to mandated quarantines outside of individual school's controls. Additionally, in grades 3-8, state assessment data is skewed by high opt-out numbers. This waiver is most definitely necessary for this school year.
353	12/10/21 7:56:32	School Administrator	Strongly Support	Schools and students need more time to recover.
354	12/10/21 7:57:24	School Administrator	Strongly Support	Over the past almost two years students, their families and school districts have struggled not only with living but also to learn/educate. As I have been navigating the open months of the 2021-2022 school year it is evident that there is significant learning loss. This loss is not just in the area of academics but also with SEL. Attendance is also a struggle as many we have seen a drastic increase in school anxiety and avoidance. Another factor that is impacting chronic absenteeism is quarantine. All three of our buildings have had to quarantine students and we are currently seeing a spike in Covid cases. As we continue through the holiday season, I can only imagine that our number will continue for both students and staff.
355	12/10/21 8:12:43	School Administrator	Strongly Support	NA
356	12/10/21 8:39:01	Assistant Superintendent	Strongly Support	I am in full support for this waiver request and appreciate all of the work and thought that went into this proposal.
357	12/10/21 8:54:43	Superintendent	Strongly Support	Accountability determinations are important, but at this moment in time, they will only distract from the other work schools are trying to accomplish.
358	12/10/21 8:59:49	Principal	Strongly Support	Given the difficult circumstances which we continue to work through, including COVID sicknesses of students, staff, parents and guardians; COVID related quarantines; live streamed instruction (which we are seeing is a lower quality than in person instruction, regardless of effort levels of educators); working through the trauma within our students which has been brought about by the impact of the pandemic (including the deaths and severe illness of family members and parents), it is my opinion that we must work to meet students where they are academically and emotionally, and work to build from those points. Through placing our focus on filling in academic gaps that have been brought on by the pandemic and providing the emotional tools needed to work through the trauma we have all experienced, as opposed to focusing on standardized testing, we will be better setting up our students and our country for success in the present and in the future.
359	12/10/21 9:01:49	Superintendent	Strongly Support	With so much going on in education right now, it makes zero sense to restart the accountability system. Some students have been in school every day throughout the pandemic, while others have missed hundreds of days of classroom instruction. Restarting the accountability system would only serve to widen the gap of inequality in education presently. Let schools make local decisions that are best for their individual school and community.

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360	12/10/21 9:17:20	Teacher	Strongly Support	The focus should be on how to support schools and students who were negatively impacted by the pandemic. The pandemic has disproportionately affected low-income students of color. Testing data can help teachers develop informed instructions. However, proficiency ratings will further widen the divide and will be more inequitable.
361	12/10/21 9:22:44	Superintendent	Strongly Support	There are so many issues with accountability at this time. Accountability is not possible without reliable data. Yes, there are always variables, but in a pandemic it is over the top. As schools, we have been asked to do the impossible. The amazing thing is we have done it. But to put a value on assessment data (learning progress) at this time is unfathomable. Students and staff are dealing with factors far beyond the reach of "normal" education. Please trim what you can to give us some space. We take accountability seriously regardless of mandates. Here at [REDACTED] we have been in school every day with all of our students since the pandemic began. However, many schools have not been able to pull that off. When you can't even get your students to school each day, how do you enforce accountability standards that are based on students being present? I could go on, but I am sure you understand our plight as a state. We are rising to the call! Let's focus on getting students back to school (bus driver shortage, staffing shortages, etc...) and then we can tackle the other issues before us. Respectfully, and thank you for listening.
362	12/10/21 9:23:10	Teacher	Strongly Support	With the COVID-19 pandemic still raging and the amount of sick/quarantined students unevenly spread across the socioeconomic strata any data collected for the purposes of school accountability will be skewed.
363	12/10/21 9:28:08	School Administrator	Strongly Support	Given the continued disruption in schools, with students and teachers in and out of quarantine, the waiver is appropriate at this time. Schools are doing their best in a difficult situation, and many factors are still out of their control.
364	12/10/21 9:40:30	District Personnel	Strongly Support	The discontinuity of education for the last two years has left a larger gap with many students for a variety of reasons related to the pandemic and related trauma. Continuing with accountability now, when we still have many students/teachers being quarantined at various times would create an even larger discrepancy in equity for schools.
365	12/10/21 9:43:07	Principal	Strongly Support	The last 18 months have been extremely hard on educators in every field. We have had schools that were completely remote, some that were hybrid, and some that were fully in attendance. How can we even begin to judge, how effective a teacher has been from one year to the next when we have had so many obstacles. We have kids that don't have internet and had paper packets to work on, while their classmates were taught by the teacher via google classroom or zoom. The learning is surely not equal in situations such as this. Waiving the accountability doesn't mean it goes away forever, it just mean we take a pause and send a message to our teachers that says "thank you for all you do everyday to care for our kids."
366	12/10/21 9:43:14	Principal	Strongly Support	Our educational system has faced many challenges and our teachers have done an exceptional job delivering learning opportunities for all students under these stressful circumstances however our students are struggling with mental health and social, emotional needs that negatively impact student achievement. It would be unfair to all to have this data collected and held against schools.
367	12/10/21 9:44:00	Teacher	Strongly Support	The pandemic has disrupted education for all students for three school years now, even those who were able to attend in person school all of last year. While data may tell us something about how students were impacted, it should not be used to label schools. Thank you for your consideration.
368	12/10/21 9:55:31	Teacher	Strongly Support	Student attendance is sporadic at best. Trying to deliver consistent instruction, practice and evaluation time for students is becoming increasingly more difficult. Setting restrictions based upon the inconsistent data that will be collected is unfair to all parties involved in education.
369	12/10/21 9:59:07	Principal	Strongly Support	We need new accountability metrics. Can you imagine comparing students this year to two years ago?
370	12/10/21 10:06:57	School Administrator	Strongly Support	Our students are facing unprecedented learning loss and mental health deficits not seen in generations. Placing undue burdens on schools will lessen their ability to respond to both of the aforementioned dire needs.
371	12/10/21 10:07:39	Other	Strongly Support	[REDACTED]
372	12/10/21 10:09:54	Assistant Superintendent	Strongly Support	Data collected during the pandemic is not reliable or valid. Modified versions of indicators would best serve the stakeholders in NY
373	12/10/21 10:17:32	Assistant Superintendent	Strongly Support	Accountability should be waived for this year. We should be looking at accurate and in the moment day from students to use for growth including benchmark data. Our students are being impacted by The pandemic perhaps more this year than last as we have had so many quarantines. To use data from 2019 is not an accurate portrayal of where students are now. We appreciate the state applying for this waiver.
374	12/10/21 10:20:01	Assistant Superintendent	Strongly Support	Your advocacy for reasonable adjustments during increasingly uncertain and stressful times is very much appreciated. Thank you.
375	12/10/21 10:23:06	School Administrator	Strongly Support	With yet another year of the pandemic and countless hours of instruction lost due to sickness and quarantines, having accountability measures put upon districts is nothing short of ridiculous.
376	12/10/21 10:29:37	Superintendent	Strongly Support	We had so many students opt out of the test last year that the data was meaningless.
377	12/10/21 10:32:19	School Administrator	Strongly Support	The pandemic has reeked havoc in our ability to adequately teach our students. After being out of the school building for several months, our return has been spotty for staff and students with positive COVID tests, quarantines, booster shot after effects, actual COVID cases, etc. Any testing would only verify what we already know: Our ability to most effectively educate our students has been terribly disrupted by this pandemic. We are using applications (i.e. STAR) to monitor our student's growth, but to add the stress of having to meet a certain prescribed standard would be counter productive for students, teachers, and staff.
378	12/10/21 10:33:35	Teacher	Strongly Support	I feel strongly that our schools across the state of New York need to be under the shield of this waiver. the students, parents, teachers and communities are going to need time to recover from the fragmented education challenges and the mental health challenges that are occurring in all buildings and communities.
379	12/10/21 10:51:16	Assistant Superintendent	Strongly Support	We need a reset to all MIPS and accountability measures.
380	12/10/21 10:51:29	Superintendent	Strongly Support	In this current Pandemic environment, the data is not reliable to make these types of determinations by the USDE.
381	12/10/21 10:51:43	Parent	Neither Support nor Oppose	I cannot make a decision. I believe that the schools/teachers should not be entirely held accountable for any poor assessments, etc., but if we do not bring to light the detriment of our State's decisions in respect to the pandemic and our children's education, how are we ever going to fix it? I believe the State needs to acknowledge that their leadership has failed our children's education and therefore needs to take every necessary step to get our kids back in school just as it was prior to the pandemic. Only then can we make progress with our failed education system.
382	12/10/21 10:52:47	Assistant Superintendent	Strongly Support	Everything about the 21-22 data was not valid. Remote students did not participate and many were in quarantine. The ELA 3-8 questions and passages were already used and students practiced with them. It is unfair to use last year's data to identify schools or for reporting purposes at all.
383	12/10/21 10:54:01	Teacher	Strongly Support	I am currently teaching third graders who have not had a full year of inperson school since they were in Kindergarten. That means they have missed a lot of pieces of 1st and 2nd grade, crucial years of social and emotional development as well as curriculum instruction. We as teachers are doing our best to meet our students learning needs, but we are reteaching more of previous years than ever before.

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384	12/10/21 10:55:07	Teacher	Strongly Support	I think we need to refrain from putting additional stress (trauma) on our students and our school staff. Everyone has been through a lot these last 3 years and I believe everyone in my organization is doing their very best to support their students in producing their best work and closing the gaps created by the last few years' challenges. Showing confidence in educators would go a long way in limiting their burden and possibly help some teachers who are reaching their limit to remain in the profession.
385	12/10/21 10:56:10	Teacher	Strongly Support	NYSED's waiver request must be granted. It would be unethical to deny the waiver request. Schools all over the country have had to face insurmountable challenges due to the pandemic. There was no precedent for schools on how to respond to a global pandemic. The 2020/2021 school year was in no uncertain terms an atypical year. Data from 2020/2021 is not an accurate portrayal of New York's schools capability to educate it's students and as such it must not be used against schools and school districts.
386	12/10/21 10:56:16	Other	Strongly Support	As a Curriculum Coordinator and as an Educational Leader intern, I have the opportunity to spend time in many districts across our region (rural SW NYS). The struggle to return to "normal" learning is disjointed, confusing, and often frantic, from district to district. A non-exhaustive list of some of these struggles include student emotional extremes, learning gaps as students were promoted to the next grade without learning occurring, student lack of coping strategies, student apathy, enraged and politically-empowered parents, lack of teaching and support staff including substitutes, and all of this resulting in teacher burnout, which leads to more lack of quality education for our children. Teachers that have state assessments are confused about what should be prioritized in their classroom right now - student well-being, actual quality learning, or the state test? Nothing will be gained by linking accountability to school data, and much is to be lost, not to mention, misguided. Please provide grace and humanity to the education system by approving the proposed waiver.
387	12/10/21 10:56:51	Superintendent	Strongly Support	We need to replace the NYS Regents examinations and 3-8 assessments.
388	12/10/21 10:58:11	Superintendent	Strongly Support	The COVID-19 pandemic continues to interfere with instruction and in-person attendance. As I District we strongly support NYSED proposed waiver request.
389	12/10/21 10:59:22	Assistant Superintendent	Strongly Support	A slow, methodical approach to ramp back up would be advisable. Student access to in-person learning varied greatly throughout the state.
390	12/10/21 10:59:25	Superintendent	Strongly Support	It is impossible to measure accountability in a year where there is no baseline from the year before and there has been extreme disruption to the educational process through out the past and current year.
391	12/10/21 10:59:36	Other	Strongly Support	If we're worried about the mental health of our students and our teachers there's no way I would even run these assessments, let alone count them for district accountability. I know it's a tough call and someone has to make it. I appreciate you asking for feedback.
392	12/10/21 11:00:01	Principal	Strongly Support	This year has proven to be a struggle for our students academically and socially. The pandemic has impacted us in ways we never expected. The instructional gaps created by the pandemic from March 2020 till now is greater than we expected. Teachers are working hard to teach standards from prior years--that are a base needed for the current grade level students are in. We, as educators, need more time to address the academic gaps that were created by virtual and hybrid instruction. If data is wanted to support these gaps that were created by the pandemic I am more than willing to share that information. Teachers are having to teacher standards they have never taught before because of the gaps created.
393	12/10/21 11:00:46	Superintendent	Strongly Support	Remediating the academic and social-emotional learning loss related to the pandemic has been compounding for nearly 2 years, and it will take at least that long to remediate it. The disruptions with which we are struggling this year as a result of the surge in cases is creating additional disruptions.
394	12/10/21 11:01:28	Superintendent	Strongly Support	Since March of 2020, COVID has turned schools upside down. While we have strived to provide the best education possible; hybrid models, school closures, SEL needs, limitations in connectivity for many students, etc. have hindered our work. It is simply not right or fair to hold schools to strict accountability measures at this time.
395	12/10/21 11:02:23	Principal	Strongly Support	It is impossible to measure accountability in a year where there is no baseline from the year before and there has been extreme disruption to the educational process throughout the past and current year.
396	12/10/21 11:05:25	Assistant Superintendent	Strongly Support	I strongly support the waiver due to the impact that the pandemic has had on the educational system.
397	12/10/21 11:07:59	Teacher	Strongly Support	After the last two years of unprecedented interruptions and challenges, public education should be afforded as much flexibility as possible. This waiver would afford us some measure of that flexibility.
398	12/10/21 11:14:27	Teacher	Strongly Support	In another school year in which quarantines have caused us to lose valuable instructional time with students, COVID restrictions restrict group work and any kind of engaging activities, and classes are longer than before to accommodate for social distancing, it would be ludicrous to require our students to be held accountable on the federal level. This will not be an accurate measure of student progress, and will most likely result in students further losing self-esteem and confidence in their own abilities.
399	12/10/21 11:17:22	Teacher	Strongly Support	I do not feel that assessments taken during a pandemic are useful or valid.
400	12/10/21 11:19:03	Teacher	Strongly Support	The last few school years have not been "normal". We should not use that data and add even more stress to the education system.
401	12/10/21 11:26:21	School Administrator	Strongly Support	These past two years have been a challenge for our students and the educational process has been completely disrupted in my opinion. As an educator, I would question the validity of any accountability measures applied to schools at this time especially since there is no baseline data to compare from the previous year
402	12/10/21 11:31:26	School Administrator	Strongly Support	Thank you for recognizing the challenges school are facing.
403	12/10/21 11:34:25	Teacher	Strongly Support	Due to continued quarantining for Covid protection and many parents keeping kids home when when for further safety. I believe it would be wise to support this waiver request.
404	12/10/21 11:36:58	Teacher	Strongly Support	Even for this current school year (2021-2022), in a district that has been fully in session for this school year & last, we are still experiencing a LARGE number of absences for extended periods of time. This is affecting a huge proportion of our student body population. This is only mid December, and the COVID infection rate in our county (Genesee) continues to rise (as of Dec 7 infection rate is over 15% and rising). A greater number of students will continue to be affected by extended absenteeism & quarantine over the months following the holidays, and throughout this school year. Beyond students academic performance, also take into consideration their social emotional responses to this pandemic, & to the politically volatile environment (communicated to them by their parents/caregivers, both directly & indirectly) in which they live. Compounded together, the effects on our little people are multiplicative! They will need sustained stability in all aspects of their academic/social/emotional lives before we can trust any data derived from their testing performance.
405	12/10/21 11:48:43	Teacher	Strongly Support	Our students and staff are VERY much under stress every day. The students are VERY behind in skills due to the ongoing pandemic and its myriad of school interruptions. It would be foolish and not at all helpful to hold students and staff accountable to the requirements in this situation.
406	12/10/21 11:51:40	Teacher	Support	N/A

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407	12/10/21 11:56:29	Teacher	Support	Students are at a disadvantage and pushing regulations on them now will be a grave disservice.
408	12/10/21 11:57:05	School Administrator	Strongly Support	<p>I strongly support seeking a waiver to not make accountability determinations and school improvement identifications using data from the 2021-22 school year. This will have negative impacts on our most vulnerable students. Vulnerable families are left enduring the impacts of the COVID pandemic. Without proper healthcare, many of these families are minimizing their child's exposure to school and keeping them home frequently for health and safety reasons. Also, these same children are susceptible to other ailments that may cause them to quarantine for longer periods of time.</p> <p>The data from the year may show students with deficits not completely based on their academic skills but a large part of any evaluation is dependent on students' ability to access instruction. Children from low-income homes with less access to instruction, will underperform on standardized tests. If a child underperforms, then they could be at risk of unnecessarily being placed in an additional intervention class away from their peers.</p> <p>Here is an example. Let's say we have a child from a low-income home and this student performs just on the bubble but doesn't need extra intervention classes. A family member of this child contracts COVID but isn't aware. The family member believes it's just allergies. This family member does not have a working vehicle, so it's unlikely they are going to take precautions by calling their primary care physician in order to arrange for a COVID test. Without knowing they have COVID this family member exposes this child, causing the child to miss three weeks of school.</p> <p>In short, the COVID pandemic has negatively impact low-income families' ability to attend school. These students are much more likely to require additional instructional support that separates them from their peers. Increased instructional time means decreased socialization time. During the time of this pandemic, our children's social needs are just as important as their academic needs.</p>
409	12/10/21 12:11:45	Principal	Strongly Support	It is impossible to measure accountability in a year where there is no baseline from the year before and there has been extreme disruption to the educational process throughout the past and current year.
410	12/10/21 12:12:55	Teacher	Strongly Support	We need to look at the learning in the state. Since there is no standard currently due to virtual learning occurring sporadically, we cannot look to standardized testing for a measure of where are students are currently functioning. Districts need to be given the autonomy to evaluate the current level of learning of the students through assessments applicable to the instruction that the students have had. If the Department of Education wants to dictate the assessments, then there should be options given to school districts in the state as to which assessments are given, the time or date of the assessments, and what the results will be used for. Each district and region has dealt with this unique learning environment in a different way, and that has to be reflected in the assessments if they are going to be valid. Tests for the sake of taking tests is not useful for the students or the teachers of our state. The tests need to have a purpose and lead to an outcome. We need to think critically, and use this opportunity to change our approach to education in New York State.
411	12/10/21 12:15:53	Teacher	Strongly Support	Our students participated in a fully online learning format from March 2020-June 2020. For the 2020-2021 school year, our school switched to a hybrid model, where students were cohorted and attended in person every third day. The days when students were not in person, they participated in synchronous online learning. Our school also offered a fully remote option for all students for the duration of the entire school year. From the end of November 2020 until the end of February 2021, our school provided synchronous online learning for all students. For the 2021-2022 school year, we are offering in-person learning, as well as a fully remote option through our BOCES. The changes noted in our academic programming have caused significant gaps in student learning, which are evident this school year. We have witnessed more student requests to drop classes than ever before, as students state that they are not academically prepared for the rigor of coursework expected of them, post remote learning. Many teachers began this school year re-introducing material that was covered during last school year, in an effort to address gaps in learning. Learning remotely was not effective for the vast majority of our student body. The pandemic has caused a ripple-effect for students' academics, as well as their emotional well-being. Students, as well as staff, are currently experiencing significant emotional distress as a result of the pandemic. As a counselor, I am personally witnessing a mental health crisis among our student body. Our entire school staff and administration are absorbing this crisis, which then affects our well-being, as well. We are seeing an increase in student school attendance issues and school phobia, which mental health professionals in our community are linking to anxiety and depression. In addition, students are missing school due to having COVID or experiencing a COVID exposure. Our school is providing students with the ability to attend synchronous online learning while they await COVID test results and/or are quarantined due to exposure or a positive test result. Much of the student work is provided to them through Google Classroom. Even with these measures in place, we are still witnessing gaps in learning. I believe that our administration is doing everything in their power to support our staff and enhance mental health support for students in our Counseling Office. We have an amazing team of teachers who are working countless hours beyond the school day to provide students with additional instruction. This has been an incredibly difficult situation for public school personnel to navigate, and we are doing our best to stay afloat and keep our students safe.
412	12/10/21 12:24:51	Superintendent	Strongly Support	Schools throughout the entire state have carried the weight of responsibility for our students and our communities since the beginning of this pandemic and continue to do so as we move forward. We have gone to great lengths to ensure that our instruction and interventions have maintained the highest quality under the most difficult circumstances in the history of public education. We have exhaustively worked to keep our students, staff and community safe while delivering as sound and comprehensive educational experience as possible. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. The data on social-emotional intervention and student performance clearly and overwhelmingly demonstrates that excluding students from interacting with their teachers and peers, whether from quarantined or mandated closures, has a tremendous negative impact on them. In [REDACTED], we have no issue administering state tests to use the information locally. This data will help our students to improve continuously. However, until everything is allowed to return to normal, pre-Covid, I support the waiver request.
413	12/10/21 12:27:30	Superintendent	Strongly Support	There has been an inordinate amount of stress on students, teachers, parents and community members over the last two years. We've all done the best we can instructionally, but maintaining an accountability system only adds stress and apprehension to an already fragile system.
414	12/10/21 12:40:47	Teacher	Strongly Support	With all of the remote instruction, the lack of support from homes, the stress of covid and how that has directly affected the children and their families all should be taken into account, prior to worrying about testing and the data from such assessments. Quite literally we all have been dealing with life and death. We should be focusing on everyone's social emotional state.
415	12/10/21 12:58:59	Superintendent	Strongly Support	The 2020-2021 and 2021-2022 test year data should not be used for identification purposes. Our emphasis should be on reengaging students and not testing them.
416	12/10/21 13:25:24	Teacher	Strongly Support	Even though students are back in school full time, they are still negatively impacted by the pandemic. Teachers are trying to make up for lost learning while, at the same time, covering required content. Students continue to be absent for vaccines, quarantining and COVID. This makes accountability requirements unrealistic.

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417	12/10/21 13:42:53	Parent	Strongly Support	Our children are still recovering from the social and academic loss from the COVID 19 crisis....which is still ongoing because of quarantines. Many kids are still not back to their normal schedules because of so many missed days THIS school year.
418	12/10/21 13:47:55	Superintendent	Strongly Support	Data from this year is not valid to assign accountability to Districts.
419	12/10/21 13:50:51	Teacher	Strongly Support	I support this waiver because it is unfair due to the numerous difficulties brought on by the Covid crisis.
420	12/10/21 14:05:16	Superintendent	Strongly Support	<p>I appreciate the department making the following points in the letter: Page 2: "However, merely reporting the numbers can cause us to focus on the symptoms of structural, institutional, and systemic inequities, losing sight of what lies beneath the surface, at the deeper policy level; and Page 3 "If states are able to complete achievement testing, they must consider that this disparate impact may be reflected in subgroup performance. One equity-minded response would be to seek a waiver for school identification and in place of those identifications and associated supports, provide supports aimed at helping students who are most likely to be negatively impacted by school closure to catchup and keep up."</p> <p>I would encourage the department to leverage these points as we re-imagine changes to the current accountability system. Rather than look to student performance as a means for identification, look to measure the amount of focus and commitment a district has to interrupt inequities. Provide districts targeted resources in these areas that are sustained and supported.</p> <p>The inequities that the pandemic revealed existed before the pandemic. Adequate housing, families in trauma, transportation to and from school, access to the internet...each contributed to why small city schools were on the accountability list.</p> <p>On page 9, it states, "The Department is also concerned that accountability measurements involving 2020-21 school year Chronic Absenteeism will result in misidentifying or not holding accountable a significant percentage of subgroups." I disagree with this statement. The way in which chronic absenteeism is being measured is inherently inequitable. When the largest populations of mobile students are representative of students of color and latino, counting these students upon 10 days of enrollment will inflate numbers. Holding districts accountable for students who no longer live in district but have not notified the district they have moved or a request for records has not come in creates an unfair system. And finally, since every district in the state has different criteria for what constitute a student absent for the day, inequities are created. If a student is remote, completes a days worth of work but does not show up on a zoom meeting, are they considered present for the day or absent? In being present, what are we measuring? Engagement? Learning?</p> <p>Page 12 - There are 215 school districts on the accountability list. Has an analysis of these district been completed to see common these across funding? Overall demographics? Through the lens of equity?</p> <p>The waiver includes many of the factors and reasons why an accountability system re-start this year does not make sense. I would respectfully ask the department to take advantage of the pause and ask the question, "did it ever make sense from the lense of equity?" If districts were inherently underfunded (look at the districts due to receive full funding under the proposed budget) and compare that list of districts with the accountability list.</p>
421	12/10/21 14:09:10	Teacher	Strongly Support	Until students are not in masks , there are no quarantine/ isolation mandates and teachers and administrators can accurately gauge the learning loss over the last 2 years, school districts should not be held accountable for poor performance by students.
422	12/10/21 14:29:43	Teacher	Strongly Support	Students have not had a typical school year in over 2 years. It is impossible to accurately assess them and use this to direct instruction when most students are in and out of school due to quarantine and remote schooling. Will you be assessing those students that are remote? How accurate would that assessment be? There are too many variables to this mess.
423	12/10/21 14:59:05	School Administrator	Strongly Support	Due to the continued increase in the number of students/staff that are forced to quarantine for extended periods of time throughout the first half of the school year (and likely into the second half), I do not believe that schools' data will accurately reflect student achievement in an equitable manner.
424	12/10/21 15:04:32	Principal	Strongly Support	NYS assessments should not be used against or for a school district. There are too many inequitable conflicts in this practice.
425	12/10/21 15:23:16	Assistant Superintendent	Strongly Support	Given the continued impact of the COVID-19 pandemic, additional flexibility regarding the use of student performance data to make accountability determinations and use of Title I funds would be greatly appreciated.
426	12/10/21 16:55:28	Teacher	Strongly Support	We also need to forget about the state tests and common core, kids are so behind now if the curriculum doesn't change we are going to have a huge drop out rate. Also, it needs to eliminates for a few years until we are caught up from the pandemic.
427	12/10/21 17:32:14	Teacher	Strongly Support	Still in pandemic
428	12/10/21 17:40:54	Teacher	Strongly Support	Eliminate NYSSA testing!
429	12/10/21 17:42:03	Union Leader/Representative	Strongly Support	The pandemic has significantly disrupted students' academic development. Teachers have not been able to teach as in normal times, and students have not been able to learn as in normal times. Evaluating schools as though things are normal will undermine our ability to help students recover and thrive.
430	12/10/21 17:42:23	Teacher	Strongly Support	We absolutely need this waiver. Please, please make this happen!
431	12/10/21 17:42:49	Teacher	Strongly Support	There is very little accountability for students who are not in school regardless of whether it's Covid related or not. As teachers were doing our job to educate the students who are present, state mandated testing at the high school level does not reflect how well a teacher is doing in their classroom given their climate, Socio economic status of their community, and the lack of accountability for students attendance
432	12/10/21 17:46:23	Teacher	Strongly Support	Standardized tests must be eliminated. Student portfolios are the tools we should be using to demonstrate growth.
433	12/10/21 17:49:14	Teacher	Support	I support however these items need to be addressed. Letting them go a year shouldn't mean putting them on the back burner.
434	12/10/21 17:49:59	Teacher	Strongly Support	Our students need time to grow and acclimate after a long, stressful period of turmoil, upheaval and loss.
435	12/10/21 17:50:24	Teacher	Strongly Support	The education of students has been negatively impacted by the pandemic again this year. Students are frequently absent for significant periods of time and continue to experience gaps in learning, not to mention the emotional and social effects of dealing with familial loss and illness. Given the number of factors that could adversely affect test scores, we cannot use them to accurately measure student growth and teacher effectiveness.

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436	12/10/21 17:51:28	Teacher	Strongly Support	Students are in some cases 2 or more years below their grade level. We are doing our best to help students catch up. Please don't penalize us for doing our best
437	12/10/21 17:51:37	Teacher	Strongly Support	Due to the pandemic the children should not be required to suffer through a state test and have it considered a guide for a school's academic achievement.
438	12/10/21 18:02:18	Parent	Strongly Oppose	It should make accountability determinations and school improvement! We need more good schools and better education for all kids.
439	12/10/21 18:03:05	Parent	Strongly Support	No Regents needed please
440	12/10/21 18:05:57	Parent	Strongly Support	I don't understand how students can be held accountable for an exam when some have been on quarantine several times since September.
441	12/10/21 18:12:16	Teacher	Strongly Support	<p>The past two years have been beyond turbulent for students, families and educators. There is constant uncertainty about the future and what academic expectations are reasonable for students. Everyone is struggling to come to some sense of normalcy and consistency.</p> <p>I have taught seventh grade history for 32 years. I have never had a more stressful and exhausting year- and it's only December. Students are anxious. I have more students than ever that are having anxiety attacks that prevent them from even coming into school.</p> <p>This is not a year to reinstate high stakes testing. Out students cannot bear it, out families cannot bear it and teachers cannot bear it.</p>
442	12/10/21 18:13:30	Teacher	Strongly Support	Students need to reacclimate to school and not feel pressure from tears on top of getting used to school in a pandemic.
443	12/10/21 18:17:35	Teacher	Oppose	Schools must have accountability. Although scores on state assessments may not be good after a pandemic they must be used to establish a baseline for improvement. If we keep deleting standardized testing we will never know where students ability truly lie. We need to access and move forward with a plan for improvement. We need to stop giving school districts a "bye" because of the pandemic. Education needs to be a top priority and we need to move on from using the pandemic as an excuse for progress.
444	12/10/21 18:18:27	Teacher	Strongly Support	With the ongoing pandemic, students' test scores should not be used to make accountability determinations and school improvement identifications. Students are missing days, if not weeks of school, due to quarantine from COVID or exposure to COVID. I can count on one hand the days of school where I've had a full class. Most of my planning time has been spent getting together work for students who are missing school due to these circumstances. This cannot be considered a normal school year once again.
445	12/10/21 18:19:37	Teacher	Strongly Support	
446	12/10/21 18:20:53	Teacher	Strongly Support	Student instruction continues to be hampered by COVID and a waver would be fair compensation for schools during such unusual circumstances.
447	12/10/21 18:30:43	Teacher	Strongly Support	I think that it is vital for this waiver to come. In good times (not a pandemic) standardized are not perfect. They are not normed for Multi-language-learners. Now that all have to wear a mask, it makes phonics instruction and language acquisition even harder for students. (I understand the importance of masks). The test scores tied to school ratings puts unnecessary pressure on all.
448	12/10/21 18:34:57	Teacher	Strongly Support	We must take into account that students are 18 months behind in many skill areas.
449	12/10/21 19:02:53	Teacher	Strongly Support	That we are attempting to weather a pandemic is manifestly apparent. That we are providing so much more than curricular instruction in these times to our students should be doubly apparent. A standardized test that seeks to rank a student's and/or school's curricular achievement during these times would be an example of bureaucratic madness. Please take the sane approach of foregoing these tests for this school year.
450	12/10/21 19:13:58	School Staff	Strongly Support	Support Union
451	12/10/21 19:30:28	Teacher	Strongly Support	The pandemic continues to be extremely disruptive to student learning, and to their conditions at home. It would be terribly unfair and unjust to impose the additional burden and stress on them that high-stakes testing surely will impose.
452	12/10/21 19:36:45	Teacher	Neither Support nor Oppose	End the school mandates!!! No mandatory vaccines, stop the testing and get the masks off these poor children's faces. It is child abuse!!! Think of the peer interactions they are missing out hearing a kindergartner asks to see what your face looks like and if you want to see theirs. And stop supporting these candidates who are only interested in their party and power. The state is a complete mess and it is the fault of these politicians who keeps supporting!!!
453	12/10/21 19:37:04	Teacher	Strongly Support	Given the interruption in education caused by the pandemic, test scores will naturally be lower than they should be and test results should not be used to evaluate unless it is to provide extra help and services to students in need.
454	12/10/21 19:48:20	Teacher	Strongly Support	Our young people are having an unprecedented year, and they are still under the pandemic strain of quarantine and family illness and deaths. It is not a year to return to normal. The needs of students must be paramount.
455	12/10/21 19:49:10	Other	Strongly Support	Our priority should be to keep our children healthy and safe. School personnel has dealt with numerous challenges the past two years. The idea of penalizing schools based on the performance over these unprecedented times is ludicrous. Can we just once be grateful for all the sacrifices school personnel, families, and students have made and acknowledge that our priorities have changed? I am a retired Pre K teacher and have my grandchild attending Pre K this year. She has missed two weeks of school due to covid in her building. It is heart breaking to me to see how the program for our youngest children has had to change due to the restrictions. She has missed the social interactions that we know are vital in any Pre K program. However recognizing the importance of keeping our children healthy/safe we have no alternative. Again our priorities must change to meet the needs and challenges of our present situation. I am grateful to the teachers and assistants who are dedicated to our children and marvel at how they have met the current challenges with such a positive attitude.
456	12/10/21 19:50:56	Teacher	Strongly Support	Another school year has been impacted by the pandemic. Students are still missing large numbers of days due to quarantining.
457	12/10/21 20:18:48	District Personnel	Support	Couple with increased Tier 1 MTSS and SEL supports, including Trauma-Informed Care, PBIS, DBT etc
458	12/10/21 20:19:45	Teacher	Strongly Support	Students still have not caught up from the loss of learning during online instruction forced due to Covid. In addition, the number of quarantines we are experiencing this year creates many holes in basic/required, curriculum.
459	12/10/21 20:20:55	Other	Strongly Support	
460	12/10/21 20:43:18		Strongly Support	<p>The pandemic has once again, disrupted student learning. Students are still suffering from depression and anxiety due to the pandemic. Many students are getting sick and quarantining, thereby missing several days of school.</p> <p>State tests need to be canceled so that teachers can focus on student mental health and well being The focus needs to be shifted from exam prep to nurturing students.</p>
461	12/10/21 20:44:28	Teacher	Support	I trust the opinion of the in this endeavor.

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462	12/10/21 20:49:43	Teacher	Strongly Support	Students have been under too much stress as it is-- with the pandemic, disrupted learning, having to follow mixed Covid guidelines, worrying about getting the virus, having family members become sick, and possibly the loss of family due to the Covid-19 virus. They should not have to also be stressed to take state tests. This past 2 years of learning have not been standardized, due to the pandemic restrictions, inconsistent and varied teaching, and disruptions in the school schedule. When learning has not been standardized, they should not have to take standardized tests.
463	12/10/21 20:54:25	Teacher	Strongly Support	Students continue to struggle with social emotional trauma from the pandemic. The added pressure of testing is dangerous at best as I have never seen so many young people pass away in such a short period of time. I believe that it is in the best interest of all stakeholders to wait at least until post-pandemic normalcy occurs for children to reinstate mandatory testing.
464	12/10/21 21:01:04	Teacher	Strongly Support	Poverty has put a severe strain on families, exacerbated by COVID. To penalize schools during this time would be devastating and discriminatory.
465	12/10/21 21:02:01	Union Leader/Representative	Strongly Support	Please refer to [REDACTED]'s letter.
466	12/10/21 21:12:11	Teacher	Strongly Support	Teachers, students, and administrators experience high levels of stress from being judged by student performance on state exams. This year, with such a focus on social-emotional learning, it would be so much more productive to use those exams as a learning tool, rather than as a one-time judgment of their academic achievement.
467	12/10/21 21:20:59	Teacher	Strongly Support	My district's proximity to [REDACTED] makes our student population highly transient on one hand, and with the ongoing pandemic and its impacts on students and families, including quarantines and (likely) more remote instruction, any state test results should continue to be seen as unreliable for such high stakes, including holding schools accountable for factors clearly out of their control.
468	12/10/21 21:44:16	Parent	Strongly Support	to whom it may concern I strongly support SED they were strongly empire I want to COVID-19 I'm a parent or someone to care for special-needs 6 7 8 greatest advocate for them I am a para in the classroom IEP's is so important as well as communication with counselors and social workers and so needed and parents need training to understand they own kids knees and understand what IPS and was supportive service they can go to outside as well as inside of the schools Especially autistic kids Spectrum disorder emotional behavior issues we are needing counselors for grieving that understands the child needs it may not be a behavior issue keep in communication with teachers who may not understand the need of a child would behavior issues it is so needed to help our children who unable to help themselves and have a voice to advocate and see the problems and communicate with each other on these issues proper resources
469	12/10/21 21:48:03	Teacher	Strongly Support	Data HAS TO mean something!
470	12/10/21 21:56:27	Teacher	Support	Students are taking so long to adjust back to normal school in person, however students also have regular periods of quarantine. Some students are on the 2nd-3rd in 14 weeks and rarely do they complete the work outside of school. So many struggling students need assistance to do the work and if they or a family member are sick their energy go towards healing. Teachers don't need another thing on their back this year in the midst of the chaos.
471	12/10/21 22:09:20	Other	Strongly Support	School has been disrupted for students, teachers, parents and communities during the pandemic. I wish SED would consider gracing students and teachers a reprieve in some of the school year expectations and allow time for students to get caught up. Education lags existed prior to COVID, they will be increased under the educational inconsistencies the past nearly two years. Grade level expectations need to be reevaluated for the sake of developmentally appropriate educational practice to meet the gaps before they become greater.
472	12/10/21 22:12:30	Teacher	Strongly Support	This is NOT business as usual. Not even close. Quarantined kids/ teachers- loss of learning everywhere we look. Not. The. Time.
473	12/10/21 22:33:33	Teacher	Strongly Support	The unique challenges we have faced over the past two years call for a suspension of the normal evaluation procedures.
474	12/10/21 22:37:42	Parent	Strongly Support	I will be opting my son and daughter out of all NYS tests.
475	12/11/21 0:16:49	Teacher	Strongly Support	I have been teaching third grade for over 30 years. This year is unlike any I have experienced. Due to the pandemic and virtual learning for the previous year and a half my students entered third grade with a range of abilities wider than ever before, with very few at the level I would normally see in an entering third grader. Most students began the year at least a year behind in math and reading. They have been learning at home with parents who mean well but do not like to see their children struggle, so they give more help than would be given in school. In 30+ years of teaching third grade I have never had any students with separation anxiety, but this year I have two. They are bravely trying to get through the days, missing their parents to whom they were able to cling to since the middle of first grade. This year I am seeing a greater lack of self-reliance and participation. Lessons that usually took a day now take several because students need to be taught skills they missed and how to participate in class, and encouraged to learn from mistakes, rather than being given help and answers at the first sign of distress. This is compounded by the vast number of absences this year due to quarantine. I have not had all my students present since early September. Every day I am missing at least one student, and most days it is at least 3. Although our district tries to offer instructional meets for these students after the regular school day ends, not all students attend or do the work assigned, causing them to fall farther behind. The "revolving door" of absent students means I always have some students for whom material is new, requiring more days for instruction to get the class close to mastery. Having to start with second grade skills and work through at a slower pace means we will not get to many of the topics usually taught in third grade. We are focusing on the most important skills and hoping other skills will be learned in the next grade(s). The students are working hard. They are making progress. They just aren't where they "should" be based on pre-pandemic standards. Administering tests to evaluate schools will not give valid data. It will just put added stress on students already under a lot of stress and take time away from teaching. Even one day of testing will impact multiple days of teaching due to the high absence rate. When students do return they will miss instruction to make up the test. (If make ups will not be required, I foresee many parents keeping their children home on test days to avoid the stress.) These are unusual times and schools are working hard to meet the needs of their students. Standardized tests will not evaluate the hard work that is going on, however. It will take several years to get these students back to pre-pandemic expectations, if that is indeed what we really want to do. Perhaps this is the break we need to reevaluate public education and fix what is broken.
476	12/11/21 0:59:04	School Administrator	Strongly Support	School personnel spend copious amount of time with contact tracing and other Covid related documents/notifications. Student and teacher attendance is greatly impacted by this virus. This is another difficult year for all.
477	12/11/21 5:44:48	Teacher	Strongly Support	While students are grappling with the difficulties of covid-19 and the affects of with them and their families, students should not have to take state assessments. Likewise teachers and administrators should not be judged by how students have been able to improve. Students and parents have admitted that while remotely learning, their focus on classroom activities and the lessons given by the teachers is not what it is while in person. Therefore, until we can guarantee that quarantine is not forcing students to learn remotely, all standard forms of evaluation should be suspended.

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478	12/11/21 6:03:02	Teacher	Strongly Support	There is a vast educational, social, civic and emotional gap in our young people due to the pandemic. It will take many years to close the gap. This type of testing is irresponsible, irrelevant and ineffective.
479	12/11/21 6:32:18	Teacher	Strongly Support	Covid quarantines have been very disruptive to this school year. We are no where near back to normal. A waiver should be granted until the pandemic has been declared officially over.
480	12/11/21 7:14:40	Teacher	Strongly Support	Teacher evaluations, for tenured teachers with good standing, should be removed as well.
481	12/11/21 7:32:07	School Staff	Strongly Support	The additional stress for parents and students is excessive and unnecessary.
482	12/11/21 7:38:29	School Staff	Strongly Support	<p>I think it is time to re-think our grade level system. Now that it has been two years in the pandemic, students that were borderline are failing even though curriculum has been flexible and in some cases does not include the rigor of the course as from three years ago. This also applies to students at all levels of achievement - strongest to weakest. I strongly feel that students should be given an opportunity for a "review year" before moving forward to a the next grade level. There are many gaps in students' current education due to many different factors during this pandemic. If parents and student were given a opportunity to enroll in a "review" grade/year to improve gaps in their learning before moving on to the next level, confidence would improve and students would have a solid education. Instead of creating more waivers to try and patch our current system, let's create a system that does not push them forward without being prepared. In a time when staff is being cut or there are just not enough qualified people applying for the positions in schools, we cannot continue to just move forward. Let's create an opportunity to slow it down for a year or half year. In the long run, it truly doesn't matter if a student graduates at 17,18, 19 or 20. What does matter is that we have an educated society to move us forward in the future.</p> <p>Under our current system, I support a waiver for the 2021-2022 school year.</p>
483	12/11/21 7:44:43	Teacher	Strongly Support	Many of my students have been out due to COVID and/or being a close contact.
484	12/11/21 7:47:46	Union Leader/Representative	Strongly Support	The 3-8 high stakes ELA and Math tests were extremely poor indicators of student growth prior to the pandemic - the time period of the virus has only made it worse and they should not be used in any student, teacher, or school accountability.
485	12/11/21 7:53:22	Teacher	Strongly Support	Please treat teachers like the professionals we are and pay us accordingly.
486	12/11/21 8:05:11	Teacher	Strongly Support	Kids are just learning how to go back to school. They do not need an additional layer of stress and anxiety.
487	12/11/21 8:18:31	Other	Strongly Support	As a teacher/instructional coach/ and parent of a current 3rd grader I strongly support the waiver due to a few very important factors. Our Third Grade students are missing parts of the code due to lack of time in schools for critical instruction. These students are not yet able to "get the words off the paper" therefore will not be able comprehend the Lexile level of the NYS test. They need more time to fill in those code gaps. On top of that those same students are not ready to then write their thoughts out, again due to lack of time with solid instruction. All of these factors are not the fault of the students or teachers. This lack of crucial instructional time is simply due to covid-19. Our current third graders only had one year or "normal" instruction which was their Kindergarten year. Please do not force these students to sit and take this test which would be another interruption of instruction and then penalize the schools. Thank you for your time and consideration.
488	12/11/21 8:21:10	Superintendent	Support	These are difficult times to get accurate data especially with the quarantines we are mandated to do and the given circumstances of Covid.
489	12/11/21 8:35:38	Union Leader/Representative	Strongly Support	With the amount of quarantines my students have had as well as missed days in our area with school violence threats it's clear that our students are still not ok. This year's data will not be an accurate gauge to use in any meaningful way.
490	12/11/21 8:39:28	Teacher	Strongly Support	The test scores from the 2020-2021 school year are not a true indicator of student proficiency in ELA and Math because some students received instruction in person, while others got it remotely; the test itself was modified and much easier than tests from previous years.
491	12/11/21 8:44:10	School Staff	Support	As the pandemic continues the past few years are not a true indicator of student and teachers performance.
492	12/11/21 8:45:37	Teacher	Strongly Support	We need to get rid of standardized testing altogether. Differentiation of instruction during the year doesn't match with trying to standardize kids at the end. It simply makes no sense. Then to penalize teachers and schools for not "making progress" based on those scores is immoral.
493	12/11/21 8:56:16	Teacher	Strongly Support	The students in my poor, rural district are behind both academically and socially due to the pandemic. They all seem to have forgotten how to be scholars because they were home for so long. Bad habits were developed that seem to still be present (ex. Taking many days off, not taking work seriously because they have been passed along despite failing). This year has been a mess too, with quarantines and Covid illness disrupting the daily flow of learning. Please give us this waiver so we have time to help the students get back on track.
494	12/11/21 9:00:08	Teacher	Strongly Support	It's beyond obvious that ranking schools is not the way to go after a year and a half of virtual learning. Also, it's time to get rid of the rigid teacher evaluations. They have done nothing to improve student performance. These evaluations have led to the highest level of teachers being unhappy. You have a looming teacher shortage. I understand that a lot of people at the state level need to justify their positions and salaries, but it's time to put teacher evaluations back into the hands of local districts.
495	12/11/21 9:07:42	Other	Strongly Support	Until all students have full time in school education and mental health issues addressed mandated testing should be suspended!
496	12/11/21 9:12:43	Teacher	Strongly Support	<p>Students are dealing with a lot of social-emotional issues right now. Several students have been out because of covid protocols. I believe the waiver is necessary because we are still in the middle of a pandemic.</p> <p>Thank you,</p> <p>[REDACTED]</p>
497	12/11/21 9:23:24	Teacher	Strongly Support	As a 3rd grade teacher, I am required to give the NYS assessment in both reading and math. My September data indicates that >80% of my students are below 2nd grade level. A large portion of these students were at home remote learning for 14 months and it was a mess. Waivers should be done until 2024-25 when the now kindergarten class takes the state assessments.
498	12/11/21 9:25:13	Other	Strongly Support	As a retired educator I have first hand knowledge of the impact this pandemic has placed on education, there is no way to determine the impact on each individual student. Using test scores as a way to determine a schools success under these conditions is ridiculous. I am in total support of NYSED's waiver proposal.
499	12/11/21 9:33:37	Parent	Strongly Support	As a parent, I have no clue how you can use data from this school year to make decisions to add or remove schools from lists such as target or support schools. Students are still being quarantined, missing school due to Covid and still trying to sort through the emotional toll they have and continue to endure due to the pandemic. Any data you collect will not truly represent what it is you are looking for.

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500	12/11/21 9:38:21	Teacher	Strongly Support	Due to the uneven teaching and learning environment caused by the pandemic, students have not had consistent high-quality learning experiences. This is not the fault of the students, the teachers, or the school districts. It would be unfair to use this year's data in assessing any school. I support this year's waiver.
501	12/11/21 9:49:30	Teacher	Strongly Support	<p>Students are still traumatized from the pandemic. Multiple and frequent school virus cases and classroom closures/ quarantines are interrupting the consistency of instruction for the students.</p> <p>There is a severe shortage of teachers at the High School level in my district. For example, most teachers at my High School teach six classes daily (this is an additional class to our contractual number of five and for which we are paid as an additional class). Almost every day, we are also asked to cover an additional class for an absent teacher. This means we do not have adequate time to prep and plan with our Special Ed. Co-Teachers as we only have a lunch period. This is making it next to impossible for us to adequately meet the instructional needs of our students.</p> <p>My school has a very high number of ENL students and we do NOT have any ENL teachers. The school administration has done everything they can to try to get one but to no avail.</p> <p>Our High School students want instruction using technology to continue in the classroom, however our school does not have enough computers for each student in classrooms. Teachers have to take turns sharing carts of computers throughout the week. For example, my students only see the computers once a week.</p> <p>I have been teaching in [REDACTED] over twenty years now and have certainly experienced many challenges in my journey. This is my most challenging school year.</p>
502	12/11/21 10:13:05	Teacher	Strongly Support	Students are struggling with the rigor of in person learning, and we need to focus on that rather than high stakes tests.
503	12/11/21 10:14:37	Teacher	Strongly Support	The entire system is stressed enough. Give time for a normal to return or more time to adjust to the new normal. Continuing to add pressure as the social emotional well being of the school house hasn't been given the time not resources to heal is ill advised.
504	12/11/21 10:33:50	Teacher	Strongly Support	Schools should not be penalized based on testing scores. The pandemic has impacted the students' learning tremendously and has set back students a full year. My first graders are like kindergarteners but the standards are still the same. Everyone needs time to recover and catch up!
505	12/11/21 10:46:13	Teacher	Strongly Support	Students continue to struggle in school after over year and a half of disruption due to COVID. I have noticed this as I teach the rigors of the Social Studies curriculum. Students lack the knowledge of previous years learning and have struggled grasping not only the content but especially the skills necessary to pass the NYS Regents examination.
506	12/11/21 11:18:36	Teacher	Strongly Support	Results from state testing during pandemic conditions clearly can not be compared to the results in others years. Students have had their educations interrupted many times and we are attempting to fill those gaps. Additional pressure to perform well on state assessments is unnecessary and detrimental to the well being of both students and staff.
507	12/11/21 11:31:38	Teacher	Strongly Support	Students and teachers need time to "get back to normal" and penalizing schools for low student performance on tests is not going to help anyone. Everyone is struggling right now emotionally and academically. We need to take that into consideration and stop trying to act like nothing has happened and go back to business as usual. Give us time to heal and recover before expecting students to perform on standardized tests.
508	12/11/21 11:49:56	Teacher	Strongly Support	Get rid of APPR and receivership
509	12/11/21 12:26:07	Teacher	Strongly Support	Since the Spring 2020 closure, the academic, social/emotional, and even physical well-being of our children has been impacted by interruption to their learning of curriculum, social norms, as well as within their homes through family struggles in this pandemic. How is it just to use the same evaluation standards that were in place and used before 2020 to assess them now?
510	12/11/21 12:43:13	Teacher	Support	We should be supporting schools, not penalizing them.
511	12/11/21 12:52:14	Principal	Strongly Support	The traditional federal accountability data for 2021-2022 will not be reliable information for making determinations about schools that are still weathering the COVID19 crisis. State and local districts must continue to be able to make determinations about levels support based on local conditions and needs especially as our communities still struggle with infections, comorbidities, and economic insecurity.
512	12/11/21 13:33:06	Teacher	Neither Support nor Oppose	<p>There are more important issues than the ridiculous socialized regents requirements. [REDACTED] should be fighting for personal choice and religious freedom from forced vaccinations and mask mandates.</p> <p>People should be free to choose what to put into their bodies and whether or not to wear a mask. This liberal politicization of a socially engineered pandemic must stop now. It is ruining this country, ruining people's lives, and running people out of NY.</p>
513	12/11/21 13:41:31	Teacher	Strongly Support	Does the state realize that I teach 3rd grade, and the last normal year for my students was kindergarten, therefore I'm teaching 1st and 2nd grade skills.... More than 3/4's of my students won't be able to read the test! Let's be realistic people!
514	12/11/21 14:17:57	Superintendent	Strongly Support	The ongoing pandemic and its disruption on district operations and student learning has been massive for nearly (2) years. In my opinion this current school has been even more disrupted than last year. Districts are doing their best to respond to student, staff and community needs in all areas, not just as it pertains to student learning. It would be unwise and not fair to try to rank a district given the current state or affairs. I would also state I hope NYSED gives strong consideration to granting waivers for any and all state assessments. Thank you.
515	12/11/21 15:05:01	Other	Strongly Support	All schools in our rural district are struggling to find a new normal. The diversity of our community brings many ideals, philosophies, and realities to the table. Finding a way to again make "school" important to parents, students, and families, for more than just academics is challenging. Student behavior and the importance of following rules, respecting others, being polite, and taking responsibility for one's own actions seems to have vanished during the need for virtual learning. Testing these students would be an exercise in futility. The result would not be a fair representation of our district at this time.
516	12/11/21 15:33:40	Parent	Strongly Support	This is not a time to have undo stress put onto our children and their teachers. I don't agree with standardized tests for students in grades 3-8 to begin with and will never support this. That's why I opt my children out every year. I also will never support teacher evaluations being based on the same tests. This is why I support this waiver and also want to see a permanent change to all of this. Our children and teachers are more than a test score!

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517	12/11/21 15:39:15	Parent	Strongly Support	Our children are still recovering socially and emotionally. These exams are representative of nothing and will only further to delay their return to normalcy. Based on last year's numbers, most students will not even take them.
518	12/11/21 15:39:29	Parent	Strongly Support	With the anticipation of covid becoming a problem across the state again in the winter, all NYS exams should be waiver for this year as well as teacher's APPR. It is also my opinion the exams and APPR should be stopped permanently as the system is broken and flawed both educationally and statistically due to the inequities these tests are created and analyzed with against minorities. Let districts and communities run their schools without federal and state interference and unfunded mandates. Thank you.
519	12/11/21 15:50:11	School Administrator	Strongly Support	Educators needs to focus on the SEL needs and academics need to take a back seat. The SEL needs of the students are at a scary level.
520	12/11/21 16:36:05	School Administrator	Strongly Support	Students are still experiencing the pandemic and disrupted educational experiences due to their own quarantines of their teachers being quarantined.
521	12/11/21 16:45:42	Union Leader/Representative	Strongly Support	I feel that it is unfair to judge any testing results because some students have been unable to get direct contact with the teachers. The students that are on remote learning have a disadvantage as to their testing scores.
522	12/11/21 16:53:12	Union Leader/Representative	Strongly Support	With the shifts due to the pandemic, we need equity in the data for all parties and stakeholders. Allowing the waiver will do this.
523	12/11/21 16:54:19	Teacher	Strongly Support	This has been the hardest year of my 25 years in teaching! Kids' needs are more than academic. We need to take care of their emotional/mental needs AND TEACHERS TOO!!!!
524	12/11/21 18:22:50	Teacher	Strongly Support	Most of my ELL students remained remote because their families feared COVID. COVID is still impacting our students' educations. The state of education in NY and throughout the country is not "back to normal." This waiver is vital.
525	12/11/21 18:57:50	Teacher	Strongly Support	The students need a waiver
526	12/11/21 18:59:50	Teacher	Strongly Support	We are try to close a gap that was created due to the pandemic so holding schools accountable when closing this gap would be destructive to each and ever school that needs assistance at this time not punishment.
527	12/11/21 19:10:46	Teacher	Strongly Support	The students have been deeply affected by the pandemic and their wellbeing can be seen in the classroom as far as the quality of their work.
528	12/11/21 19:26:12	Teacher	Strongly Support	believe NY State should: Not use 2021-22 school year data to identify or remove schools from identification as Comprehensive Support and Improvement Schools and Targeted Support and Improvement Schools; Not assign accountability levels to schools or subgroups of students on each of New York's accountability indicators; Provide schools that are at risk of identification as Targeted Support and Improvement Schools based on their 2018-19 school year performance the opportunity to apply for Title I School Improvement Grant Funds. (Without a waiver these schools would not be eligible to participate in this grant.)
529	12/11/21 20:30:21	Union Leader/Representative	Strongly Support	Nothing is normal and everyone is struggling. Masks need to go if we want to connect with our students ever again.
530	12/11/21 20:48:15	Superintendent	Strongly Support	Accountability associated with these assessments given the different instructional models across the state will only yield flawed results and flawed data that will not be representative of true needs and abilities.
531	12/11/21 21:53:53	Teacher	Strongly Support	It's time to stop holding schools hostage over standardized test scores.
532	12/11/21 23:14:55	Parent	Strongly Support	After two years of varied schooling, this is not a good way to assess our students.
533	12/12/21 1:33:39	Principal	Strongly Support	Considering that the 2020-2021 NYS tests were not even the same format as the 2019-2020 test, and that we were informed that we really cannot compare results from last years test data to previous years, it would be best not to use the 2020-2021 data to make decisions about schools for Targeted Support or Improvement Schools for thus school year. We are just getting back to basics and getting everyone back to school. Please consider waiving last year and focus on this current school year.
534	12/12/21 3:58:05	Parent	Strongly Support	The instability that the pandemic has brought with it to teachers and students makes any type of accountability factors unreliable. Major decisions should not be based on a school year that is so up-in-the-air. Some teachers and students have been quarantined multiple times already this year, and many families in our area are without internet access. Everyone is trying their best, but this has in no way been a "normal" year and to be judged on it doesn't make for good educational practice.
535	12/12/21 6:55:58	School Staff	Strongly Support	With many students unvaccinated and the quarantines, they are in and iut of school every couple of weeks and therefore not receiving continuity needed.
536	12/12/21 7:14:47	Teacher	Strongly Support	There is nothing normal about this school year. Every day things change. Some students are in the classroom. Others are COVID positive or quarantined. Teachers are teaching all day in the classroom and after school preparing remote lessons. No one was trained for this. It is impossible to judge anyone, students or adults, on the teaching and learning that is taking place this year. It changes day to day with no warning.
537	12/12/21 7:23:08	Teacher	Strongly Support	We have had a large number of our students quarantined multiple times due to COVID. They have missed multiple days of instruction.
538	12/12/21 7:30:35	Teacher	Strongly Support	Teachers have been through too much to have to worry about test scores determining their fate.
539	12/12/21 7:33:18	Teacher	Strongly Support	Student skills are weak with overwhelming learning gaps, all due to the disruptions of the pandemic. Schools will need multiple years of normal operation before student testing scores will be representative of the education received at our schools.
540	12/12/21 7:37:00	Teacher	Strongly Support	We have students that have been in and out of quarantine more so this year, than past years. It feels like a continual September of trying to get students back on track. The inconsistency of attendance due to state regulations has been a harder hit on students than the 2020-2021 school year.
541	12/12/21 7:48:27	Teacher	Strongly Support	Our children need to have their SEL addressed from the trauma of covid before we can focus on academics.
542	12/12/21 9:13:26	Teacher	Strongly Support	Our schools, our staff, and our students are more than a score
543	12/12/21 9:17:15	Teacher	Support	End COVID restrictions and stop any potential vaccine mandates!
544	12/12/21 9:43:31	Teacher	Strongly Support	Due to COVID 19, our students academics have completed shifted. Students are a whole grade level behind and it is the responsibility of the teacher to bridge the gap rather than test prep. Putting a hold on the state test is truly in the best interest of the students. They have gone through so much and have a tremendous amount to catch up on.
545	12/12/21 10:06:51	Teacher	Strongly Support	This year we have been working to get our students to their academic levels. The pandemic made learning very difficult for most students. Many dealt with mental, academic and health trauma. Teachers tried very hard to keep school as normal as possible. Students are behind academically and socially. As we try to normalize school and the current situation it would be unfair to use testing and scores as a way to gauge school funds. Students and teachers alike need support both academic and emotional. We have been working under circumstances unknown to all and making the best of it. Penalizing or judging us is not helpful and adds more mental stress to us all.

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546	12/12/21 10:32:34	Teacher	Strongly Support	We are still in a pandemic!
547	12/12/21 10:43:51	School Administrator	Strongly Support	After implementing our fall assessments for boy data, the data shows students are incredible behind, almost exactly 20 months on average.
548	12/12/21 10:44:58	Parent	Strongly Support	I would like to see us take this opportunity to look into some much needed discussion and action into improving our educational systems as a whole.
549	12/12/21 11:18:28	District Personnel	Don't Know/No Opinion	Stop COVID restrictions and potential vaccine mandate!
550	12/12/21 11:54:21	School Staff	Don't Know/No Opinion	END COVID RESTRICTIONS AND STOP POTENTIAL VACCINE MANDATES
551	12/12/21 12:12:21	Parent	Strongly Support	Say No to all mandates- End Covid restrictions, stand up to mask mandates, and stop potential vaccine mandates.
552	12/12/21 12:13:46	Teacher	Strongly Support	Stand up for your members! End Covid restrictions and stop potential vaccine mandates!
553	12/12/21 13:01:44	School Administrator	Strongly Support	School district's continue to deal with the implications of COVID on instruction and school's. Therefore, accountability measures for the 21-22 school year will not only be based on invalid data, but are inequitable in their nature.
554	12/12/21 13:17:46	Teacher	Strongly Support	Two words... Rolling quarantines!
555	12/12/21 13:41:39	Teacher	Strongly Support	It is deeply concerning to me that the districts and the State as a whole are rushing back to standards for early childhood students that are developmentally inappropriate. Putting undue stress on 1st graders who are reading at a Fountas-Pinnell Level B or C, which was at one point the beginning of the year benchmark, is ill-advised and counterproductive. These early childhood students, and their families, do not need this kind of burden as the pandemic lingers.
556	12/12/21 14:13:53	Teacher	Don't Know/No Opinion	end covid restrictions and stop potential vaccine mandates
557	12/12/21 14:33:23	Teacher	Strongly Support	In the light of the pandemic students have gone through interrupted learning consistently and some have being even stressed and traumatized . Some had device issues and because of such, attended classes inconsistently. Some of students who had academic challenges before the pandemic have even regressed 2 levels below their grades. The achievement gap is frightening. I strongly feel we should use this year as ushering them back into some normalcy of the school environment . Getting them acclimatized and focusing on their severe deficiencies are essential . However give them some time. Therefore, I do not think the teachers/school community should be held accountable or be pressured for their significant success, at least for this school year. We all have been through a lot!
558	12/12/21 15:35:42	Teacher	Strongly Support	I strongly support a request for a federal waiver from state accountability requirements for 2021-22. We are far from back to normal times. Instruction has been very difficult so far this year due to many pandemic related reasons. One being quarantines. We have had significant numbers of students having to be out for up to two weeks on quarantine orders. There are many students who have had multiple quarantines so far this year. There have been many students being out sick with COVID. Also, many students mental health has been significantly impacted due to everything that they have been through over the last almost two years. There are students that have suffered the death of parents and other family members, students who have endured abusive situations while at home during the shutdown, and other traumas related to being isolated during the shutdowns and virtual learning. There are students who are now juniors in high school and have never taken even one Regents exam. Schools are filled with students who are so damaged and fragile from everything that has taken place that school and learning are not their priorities at all right now. It would be cruel to use testing data to label or penalize schools this year.
559	12/12/21 16:49:40	Union Leader/Representative	Strongly Support	2020-21 was a unique year with so many students being virtual. The 2021-22 year is unlike any other year for schools as well. We still have students in and out of school due to Covid exposures, quarantine and even having Covid and being sick. Some students and teachers are in and out of quarantine regularly. Not all of our students are back in-person this year either. Students are reengaging with school schedules and socializing and learning in school. Staff is working hard with Social Emotional Learning with students, many of which are just returning to school since March 2020. Staff are working hard but student assessments and student data should not be used for certain purposes.
560	12/12/21 17:17:28	Teacher	Strongly Support	These issues are so necessary in this unique situation.
561	12/12/21 17:34:46	Teacher	Strongly Support	Maslow before Bloom. Give us the space to educate the whole child and not come at it from an anxiety producing deficit model.
562	12/12/21 17:35:58	Union Leader/Representative	Strongly Support	Our children and faculty should not be pressured by fear of punishment . We must care for our kids as they are and move them forward in a health and caring way.
563	12/12/21 17:40:35	Teacher	Strongly Support	End covid restrictions and do not support the mandates.
564	12/12/21 18:37:44	Parent	Strongly Support	Last year and this year have not been anything like a regular school year. This is not the fault of the schools, teachers, or students. Everyone is doing their best and should not be penalized for things out of their control.
565	12/12/21 18:48:53	Assistant Superintendent	Strongly Support	Due to continued extenuating circumstances with the disruptions in education concerning quarantine and isolation orders in addition to some students returning to formal education after 18 months, we strongly recommend the waiver request.
566	12/12/21 18:55:37	Teacher	Strongly Support	As a classroom teacher we are still seeing the impact of Covid on a daily basis. Can my students take NYS tests if required? Yes! Will my students be prepared? Yes! Is it in their best interest? NO! We are still seeing students out of the classroom for quarantines. Digital instruction is in no way as effective as in person, especially for our students requiring special education supports and other services like speech and occupational therapy. Our students are also still suffering the emotional pain that Covid has brought into their lives. They are still suffering from being scared, confused and learning how to navigate in a very scary world. Please consider easing their emotional burden. Allow them to be students who are learning how to be good citizens. They are more than numbers on a test paper. I ask this not only as an educator, but the wife of an educator and a parent.
567	12/12/21 19:18:58	Teacher	Strongly Oppose	Learners need to be assessed and schools need to be held accountable if they're not learning. Time to get our schools back to normal. Masks Off and no forced vaccines. No discriminating against students based on covid -19 vaccination status. [REDACTED] administration , etc need to be held accountable if students are not learning.
568	12/12/21 19:39:33	Teacher	Strongly Oppose	I believe this curriculum is driving a larger gap between us, rather than uniting us. I oppose Funding for this.
569	12/12/21 19:40:29	Parent	Strongly Oppose	I am opposed to this curriculum.
570	12/12/21 19:42:29	Parent	Strongly Oppose	Stop trying to divide our children. Solving racial mistakes from the past with racism today is wrong.
571	12/12/21 19:51:11	Teacher	Strongly Support	We need to end high stakes testing.
572	12/12/21 19:56:50	Teacher	Strongly Support	Based on living in a COVID-19 world, I feel it is unjust to rate students and teachers as you would during pre-COVID-19. The students are showing greater anxieties and teachers must cope with death in the students' families and their own.

#	Date of Submission	Stakeholder Group	Degree of Support for Waiver	Provided Comment (Note: Items have been redacted to ensure privacy of stakeholders)
573	12/12/21 20:05:54	Teacher	Strongly Support	We have a lot of our students who have been severely impacted by the pandemic. And as we have shifted back to in-person learning, we are still finding a lot of students miss instructional time due to on-going COVID scare. We are constantly playing catch-up for the lost instructional time and we can clearly see our ELLs and SWD students being those who are greatly impacted by this. Despite technology provided to many of our students, we cannot ignore the fact that many of our students are still not proficient in technology. And so, when they are home quarantining, they are still unable to catch up to the missed instructions. As a staff member, I can say that this year it seems like we are expected to teach 100 things in one class and expect everyone to be proficient at what was taught, which is of course unrealistic. And it is overwhelming for everyone (staff, parents, and students). It will be unfair to expect our community who has been greatly impacted by the circumstances of COVID to same achievements as we would if there was no pandemic. Besides that, many of our students are dealing with social and mental challenges and without tackling that first, I don't see they can be expected to perform as good or better than they did prior to COVID. There definitely needs to be flexibility provided to our students and educators so we can first provide students the basic needs that serve them as pillars of support in their education.
574	12/12/21 20:31:30	School Staff	Strongly Support	We are still in the middle of a pandemic, we cannot make believe this is a normal year and that things are back to normal.
575	12/12/21 20:36:17	Parent	Strongly Oppose	Stop trying to infuse DEI into our schools. Enough with the politics. Educate our children and stop wasting federal dollars to discriminate and cause division. Get back to the basics
576	12/12/21 21:03:39	Parent	Strongly Oppose	Schools do not need more funding for diversity and equity. Stop making students look for problems that do not exist.
577	12/12/21 22:05:42	Assistant Superintendent	Strongly Support	I agree with The Department's rationales for each of the three points in the waiver proposal. Additionally, I hope that the discussion around recalculating baselines is an ongoing one. I believe I recall that idea included in the initial survey for input on a potential waiver request.
578	12/12/21 22:31:21	Other	Strongly Support	Teachers have been working soooo hard to get kids back to their usual grade level abilities and it hasn't been easy since some students did very little last year and parents didn't make those students work! To penalize the districts and the efforts of teachers when students didn't do the work is unfair. Give teachers another year to work on getting students skills back and moving them to grade level.
579	12/13/21 6:38:48	Superintendent	Strongly Support	Thank you for supporting our schools and understanding that the pandemic has impacted all schools across the state.
580	12/13/21 6:52:27	Teacher	Strongly Support	How can you hold schools/teachers/students accountable to meet this high standards when there hasn't been a "normal" school year in three years? It unbelievable that it would even be considered in the midst off all of this when all we hear about is mental health concerns, but the state is now putting unnecessary stressors on everyone with this accountability requirement.
581	12/13/21 7:05:54	Teacher	Strongly Support	I fully support requesting the waiver as we work through all the roadblocks that the pandemic has caused. Our students need our support and do not need to be pressured with the tests at this time just so that we can recieve funding to continue to build up their knowledge base.
582	12/13/21 7:08:30	School Staff	Strongly Support	Given all that we are dealing with during the ongoing pandemic, I find it necessary to request a waiver to not make accountability determinations and school improvement identifications using data from the 2021-22 school year and to provide flexibility in the use of Title I School Improvement Funds. We are already stressed out enough in trying to perform pour jobs at an exceptionally high level. However the COVID-19 pandemic is still impacting both student and staff attendance and has made it difficult to provide exceptional quality services.
583	12/13/21 7:18:34	Teacher	Strongly Support	Due to mandatory quarantines there are many students that have missed more days this school year than they have been present. In a largely rural school district many of these students do not have reliable internet. As educators we are unable to effectively teach students under these circumstances. Holding schools accountable should not be a priority.
584	12/13/21 7:29:31	Teacher	Strongly Support	As the days progress, more of my students are required to quarantine. While we (myself, the students, and their parent(s)) try our best to prepare my students for the Regents, virtual learning makes it difficult, and at times, impossible.
585	12/13/21 7:31:16	Teacher	Strongly Support	Students have fallen behind in their social skills more than anything else. We need time to build back community before we can focus at all on curriculum.
586	12/13/21 7:36:02	District Personnel	Strongly Support	I believe that this years data will have a stronger impact on how schools are doing based upon students being back within our physical classrooms.
587	12/13/21 7:48:01	Teacher	Strongly Support	Students are greatly struggling this year all over socially, emotionally, academically, and behaviorally. We are trying our best to fill the gap from the pandemic that we are still currently going through. However, it is going to take a lot of time.
588	12/13/21 7:50:46	Teacher	Strongly Support	The continued gap in learning and the constant quarantining is not fair to educators. Along with the current community environment to blame.
589	12/13/21 7:51:42	Teacher	Support	Students need to be reacclimated to proper conduct in school and expectations.
590	12/13/21 7:51:47	Teacher	Strongly Support	Testing has impacted our students academic growth. It needs to STOP!!
591	12/13/21 7:54:06	Teacher	Strongly Support	Under the best of times "high stakes" testing is a terrible measure of student progress; as we continue to adapt to the pandemic testing has to be the least of our concerns. The amount of stress placed upon students is overwhelming and anyone who supports a continuation of State Assessments should also accept full fiscal and emotional responsibility for the damage done to our student body.
592	12/13/21 7:56:42	Teacher	Strongly Support	Many students, and my own children at home, are readjusting to the school climate. As a teacher, I've made strides to get my students caught up and back at grade level. I feel that the Regents Exams would be unnecessarily punitive to students that have suffered so much loss here in NYS over the last two years.
593	12/13/21 7:58:06	Teacher	Strongly Support	The current students are having a difficult time transitioning back to in-person learning. Many have not actively participated in learning. Many were below learning levels prior to the close-downs and are struggling mentally and physically with school. I believe the last thing many of these students need is a high-stakes test. We already know that there is a gap within their education. Please let us focus on that first!
594	12/13/21 7:59:01	Superintendent	Strongly Support	As you know, schools are dealing with a pandemic and doing their best to maneuver through it the best they can. Mental health of all involved is unraveling and school leaders are being asked to put the pieces back together while staff, community, and students are doing the best they can, but ultimately, struggling. The aforementioned needs to be the priority right now.
595	12/13/21 8:01:25	Teacher	Strongly Support	The mental health of my students is far more important than a test score. This pandemic has brought great loss in life and financial stability for families in my community where I teach. Please grant the waiver!
596	12/13/21 8:07:19	Principal	Strongly Support	As much as we had hoped, we have not fully recovered from the COVID-1 pandemic. We are still in the ebb and flow of quarantining students and sometimes entire classrooms. We are still experiencing 2 week cycles of absenteeism as a result of the quarantine mandates. Although our staff are doing their best to provide virtual instruction during those blocks, we know that students learn best in their school settings.

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597	12/13/21 8:08:33	Assistant Superintendent	Strongly Support	The NYS tests should be used to help districts get a better understanding of where their students are struggling in and excelling, not potentially punish districts for low test scores. The state tests have been inconsistent at best for the past 4-5 years and they are not designed to help districts better understand where students are academically. If we want to use the tests correctly, we need to get the data back sooner (July), so that schools can focus their energy on revamping curriculum.
598	12/13/21 8:10:36	Teacher	Strongly Support	This pandemic has impacted so many kids lives and their education. it would not be fair to judge them on what they have never experienced or how far behind they are due to these circumstances. Please grant the waiver so that we can help these kids.
599	12/13/21 8:12:02	Principal	Support	I support New York State's waiver, but also feel CSI and TSI schools should have the ability to display adequate progress to be removed from the identification.
600	12/13/21 8:15:48	Principal	Support	I support this waiver, as we have been living in unprecedented times and have not returned to a baseline performance, which will skew data. Once we have returned to a baseline year, I believe data will be able to be used to make determinations.
601	12/13/21 8:16:10	Teacher	Strongly Support	Students are working on focus/ spiral activities to bridge the gaps that were created from diverse distribution of instruction last school year. This is taking place simultaneously with the instruction necessary for grade level standards that need to be addressed. Is it a true indication of student learning when they are working to get caught up? This school year, attendance has fluctuated due to COVID related absences and those students are receiving intermittent face to face instruction as a result. Please consider the proposed waiver until "school" can get back to normal and there can be a true measure of teacher effectiveness based on student performance.
602	12/13/21 8:18:26	Principal	Strongly Support	Due to the high number of student and staff absences attributed to Covid 19 and its effects I feel that the data collected this school year is not a true indication of student and staff performance.
603	12/13/21 8:18:48	Teacher	Strongly Support	Thank you!
604	12/13/21 8:19:48	Superintendent	Strongly Support	Despite the fact that we are in person for learning on a full-time basis, consistent quarantines and high illness rates are making student and staff attendance difficult. The fluctuations are certain to have an impact on student performance.
605	12/13/21 8:22:15	Teacher	Strongly Support	Every day, I see first-hand the learning deficit that has resulted from the COVID-based modifications that have been in place for the past two years. Schools are making progress toward getting students caught up; but more time is needed.
606	12/13/21 8:23:59	Teacher	Strongly Support	The pandemic has severely impacted students' ability to learn in a consistent environment. After two years of interrupted learning, deficits cannot adequately be corrected to allow students to accurately demonstrate their skills and knowledge related to a subject. High stakes testing is not only unfair to students, but it also places the need to prepare for such testing above the need to teach skills students need for future success.
607	12/13/21 8:24:00	Teacher	Strongly Support	The pandemic is still very much so affecting our students and staff. Students are pulled out for multiple days for quarantine, missing much-needed in-school learning and support. Family members of students are still dying due to Covid. With yet another variant of Covid, who knows what the future will hold for the rest of this school year. Students have been away from testing for two years, they do not have the basic test-taking skills needed for some of these NYS exams. Give them, but don't penalize the students, teachers, school districts for the after math of this pandemic.
608	12/13/21 8:24:36	School Staff	Strongly Support	The start of this year has already been very difficult to handle. I am a high school counselor at [REDACTED] and the amount of mental health issues, conversations, physical altercations, outpatient mental health assessments taking students out of class on a daily basis, and in multiple days at a time are severely impacting the day to day learning environment here. With the students being out of school for as long as they were the adjustment back into the building has been difficult to say the least.
609	12/13/21 8:25:10	Teacher	Strongly Support	Testing these kids when they are so far behind due to COVID is wrong and unjust. When the world is back to normal, testing should resume as well.
610	12/13/21 8:27:44	Teacher	Strongly Support	Student grades should NEVER be an indicator as to how well teachers are teaching!
611	12/13/21 8:28:07	Teacher	Strongly Support	Students are just finding their way back to school - they do not need to be penalized for circumstances beyond their control. Teachers are working extremely hard to fill in the gaps of learning and should also be given another year to help students be successful.
612	12/13/21 8:30:19	Parent		Due to the continuation of the Covid situation, our school has made every attempt to keep our children in school and safe through all of the challenges with this. Unfairly targeting schools in these challenging times is absolutely crazy. The threat of withholding aid to schools which are doing incredible teaching with the limitations on them should not even be real. Our school district is absolutely amazing, and we deserve aid
613	12/13/21 8:32:45	Teacher	Strongly Support	With the effects of the pandemic still hitting our schools, we need to be able to work with our students without the ramifications of testing data being used to determine our funding.
614	12/13/21 8:32:57	Teacher	Strongly Support	With the effects of the pandemic still hitting our schools, we need to be able to work with our students without the ramifications of testing data being used to determine our funding.
615	12/13/21 8:35:22	Teacher	Neither Support nor Oppose	I believe at some point we can not continue to make excuses why we, as teachers, should not be held accountable for student learning. How long are we going to make excuses for why we should not be responsible for student learning? I realize their is mental illness as a result of COVID-19 for both students and teachers. But, we need to continue offering a high level of teaching to prepare our students to become independent learners and to be successful in the real world. To some extent I believe we need to continue to access student learning.
616	12/13/21 8:35:35	Teacher	Strongly Support	It can not be business as usual...children are still catching up and everyone needs more time to recover and rebuild foundational skills and find and fill in gaps. High stakes testing goes in the opposite direction of that endeavor.
617	12/13/21 8:37:11	Principal	Strongly Support	Given the continued hardship on schools, we need to amend the testing.
618	12/13/21 8:38:39	Principal	Strongly Support	Students need time to catch up. The pressures of covid on teachers and students is understated.
619	12/13/21 8:43:57	Teacher	Strongly Support	My high school uses the semester block schedule. I have students who have been quarantined two or 3 times this fall because they are unvaccinated. How are going to take the Global Regents, science, math, when my district does not have remote teaching for these students? Many students are fragile, due to lack of mental health and not having the coping skills to reenter school and society.
620	12/13/21 8:43:58	Teacher	Strongly Support	Students are struggling to get back to "normal" and school has been a huge struggle for most students. Just trying to get students back into the swing of things has taken months! The added stress/pressure of state exams is too much for most of these students.
621	12/13/21 8:46:19	Teacher	Strongly Support	Our students are still recovering academically, emotionally, and mentally from several years of disrupted learning. The stress put upon both them and on teachers is already high, as we are still in the midst of a global pandemic, and if this waiver were not granted that stress level would only become higher and more dangerous. Please put our students' and our teachers' mental and physical health first.

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622	12/13/21 8:47:10	Teacher	Strongly Support	The inability to eliminate the constant threat of Covid and the various associated pandemic illness lurking throughout society. These affects on students overall wellness both social and emotional wellbeing.
623	12/13/21 8:47:35	Principal	Strongly Support	The inequity gap has pervasively widened due to COVID-19. Using data that is not representative of our students or teachers skills, is an unjust accountability measure of our schools.
624	12/13/21 8:51:19	Teacher	Strongly Support	This pandemic is still not over. Students continue to suffer from the disruption in learning due to COVID. This waiver is an appropriate and much needed response to the current situation.
625	12/13/21 8:54:43	Teacher	Strongly Support	The academic gap from the pandemic is severe! My fifth graders have not seen a normal school year since second grade! Students have been forced to quarantine every single time they show any symptom or sneeze. They are missing tremendous amounts of school. There is instability in their lives. These are just a few reasons why the 2021-22 school year data should not be used to or should be removed from identification as Comprehensive Support and Improvement Schools and Targeted Support and Improvement Schools.
626	12/13/21 8:55:16	Teacher	Strongly Support	I think the waiver needs to be strongly considered due to the climate that schools are in because of students who are still acclimating to returning to school on a full time basis.
627	12/13/21 8:56:20	Teacher	Strongly Support	My school is a CSI school and the funding we receive is making a difference. I ask NYS to not use 2021-22 school year data to identify or remove schools from identification as Comprehensive Support and Improvement Schools and Targeted Support and Improvement Schools; Not assign accountability levels to schools or subgroups of students on each of New York's accountability indicators; Provide schools that are at risk of identification as Targeted Support and Improvement Schools based on their 2018-19 school year performance the opportunity to apply for Title I School Improvement Grant Funds.
628	12/13/21 9:05:02	Teacher	Strongly Support	This is my 32nd year teaching in this district; I have been assigned to the Middle School for over a decade now, and this year, the majority of my 6th graders are testing between a 2nd and 5th grade level. Their academic skills are low across the board--reading ability, reading comprehension, written expression, basic spelling-grammar-usage. I have never seen anything like it. I gave them part of a 4th grade state test a few weeks ago; 20 of my 76 students received a passing grade. Granted, it was a small sample from the entire test, but it is notable. I was hoping to use it as a reminder & review of basic C-E-E after choosing a story where I didn't think I'd have to worry about comprehension as a factor; I was shocked. No. Words.
629	12/13/21 9:07:13	Parent	Oppose	Since March, 2020 school districts/schools have had to imagine, create and many times envision new ways of learning for students all while being flexible in an ever changing environment. Now, almost two years later it is time to get schools back on track, for students to continue to learn content at their grade level and that there is now accountability for annual progress in many areas. If we continue to say we can't or that we have not learned anything from the last several months then we are never going to get very far ahead.
630	12/13/21 9:11:22	School Administrator	Oppose	Everyone has a responsibility to be held accountable to standards. School districts are still held accountable for Financial Transparency Reporting, Auditing Reports and Submissions, Budget Votes, ST-3 Financial Reporting, Federal Grant deadlines, Special Education Reporting, etc. Instruction also needs to be measured, reported, and interventions identified where needed, as well as, instructional staff held accountable given taxpayer dollars being spent when many taxpayers, especially in the agricultural sector are struggling to hold on to small farms and pay such taxes.
631	12/13/21 9:13:43	Teacher	Strongly Support	The disparity of resources across the varied districts of the state supports the need for this waiver
632	12/13/21 9:16:14	Teacher	Strongly Support	The students entered the current year lacking sufficient knowledge due to the conditions last year. Combining that with the periodic quarantining taking place this year, they are still being hobbled academically due to no fault of their own - for most of the past two weeks my attendance rate has hovered between 40% and 60%. Things will go back to normal at some time. Reasonably, it will be a few years before we stabilize the situation. It is not yet that time.
633	12/13/21 9:16:46	Teacher	Strongly Support	At this time, the pandemic is still affecting our school community. Quarantines and positive tests are a constant and disrupt continuous learning. The tests are not a holistic view of what the children are learning. I strongly agree that testing for this year should definitely be suspended. Thank you.
634	12/13/21 9:18:03	Superintendent	Strongly Support	I do not believe that our state has been able to provide sustained education due to the Covid Crisis. If we continue to show negative metrics it will further hurt the mental health of an already struggling staff and student body.
635	12/13/21 9:21:16		Strongly Support	As a Superintendent for a small (450 PK-12) district, using 21-22 school year data for accountability purposes will mainly show impacts due to the Pandemic and negatively impact small cohorts typically found in districts like ours.
636	12/13/21 9:22:00	Principal	Strongly Support	This is not the time to make accountability determinations a priority. The students and staff are greatly impacted in so many ways. This is just not the time to concern ourselves with accountability issues that, in my opinion, will not be reflective of the true work that our communities are providing. We need to continue on providing greater resources for SEL and mental wellness. I fully support seeking the waiver.
637	12/13/21 9:23:58	Parent	Strongly Oppose	Accountability without regards to the current state of student progress and achievement, however impacted by school official decisions associated with the pandemic, runs counter to the fundamental goals of ESSA and should be opposed lest our children be allowed to fall further behind, leading to an irreversible, generational performance gap.
638	12/13/21 9:25:52	Teacher	Neither Support nor Oppose	I do not have any comments.
639	12/13/21 9:28:05	Teacher	Strongly Support	Covid absences for both students and teachers alike.
640	12/13/21 9:30:21	Teacher	Strongly Support	After what our community has been through over the past 2 years, the last thing that is needed is additional stress. Students, families and school personnel have been under continuous pandemic assault since Feb. 2019, and there is no immediate sign of true relief. Due to learning losses incurred prior to this September, this year's return to on campus instruction has focused on remedial work and a restoration of social/emotional comfort.
641	12/13/21 9:31:36	Teacher	Strongly Support	Although this year has not been interrupted by school closures or a hybrid learning situation, I am finding that students are still dealing with educational and emotional issues as a result of the pandemic. The last time my current 4th graders had a normal school year, they were in 1st grade. They are still relearning how to be a student in a classroom environment. I am also having to reteach earlier grade concepts because they were not fully able to internalize those skills due to closures and hybrid learning. We cannot penalize schools or children for their test scores after a year and a half of irregularity in education.

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642	12/13/21 9:36:57	Assistant Superintendent	Strongly Support	We are working tirelessly to ensure our classrooms have qualified staff working on their behalf. With the staff shortage and substitute teacher, teaching assistant, and aide shortage instruction is impacted. Additionally, we do not want sick staff members reporting to work. This puts a strain on the system and as a result it is difficult to assess student performance with the instructional interruptions.
643	12/13/21 9:39:01	School Administrator	Strongly Support	It does not make any sense at all to consider 2020-21 or 2019-20 in any kind of data measurement for accountability purposes due to the global pandemic. The 2021-22 school year can almost be considered a new baseline year to use moving forward.
644	12/13/21 9:43:10	Teacher	Strongly Support	Students have not experienced a consistent approach to supportive education in more than 20 months. How can we assess them in the same way we have in the past? It is not fair to the students who are striving to make up academic and emotional gaps, nor is it fair to the teachers who are working diligently and exhaustively to make up those gaps.
645	12/13/21 9:43:28	Principal	Strongly Support	Please keep in mind that children continue to be quarantined for extended amounts of time. The level of instruction they receive when they are home is not equivalent to what they are receiving in school. It is unfair to hold teachers/administrators/schools accountable under these circumstances.
646	12/13/21 9:46:31	School Administrator	Strongly Support	We need to completely rethink standardized testing period. We already over test our students with progress monitoring and other tests we are required to give our students. As educators we should be most interested in students demonstrating skills they are learning and not concerned about whether or not they memorized the information to pass the test - research shows that memorized information does not stick because there is lack of context.
647	12/13/21 9:48:08	Teacher	Support	None
648	12/13/21 9:54:08	Teacher	Strongly Support	<p>Education does not exist in a vacuum. It occurs in the midst of life. While in the course of every life challenges and sorrows exist, collective sorrows impact everyone. A collective sorrow is like the molten lava of an erupting volcano. It covers everything in its tracks. No one is immune. Can we expect our children to be immune to the collective sorrow and trauma of the pandemic? Can we expect them to be as present in their learning as in years past? Have they not experienced the trauma of interrupted learning? Have they not wondered how life continues after so much suffering? It is not a devaluing of education to value the learner's trauma. With thirty years experience as a classroom teacher, I have taught through many collective traumas but the pandemic is different. In thirty years of teaching, I have never experienced as disrupting a force as this pandemic.</p> <p>Only in the pandemic were schools closed and shuttered. Only during the pandemic were students sent to learn from home. Yes, they have returned to our buildings but what is the existential shock of the experience? Does it linger? Can they simply return to business as usual? It is critical to remember that for children the pandemic is not just traumatic. For our children, it has felt apocalyptic. How could our schools be closed? Can the child who has experienced that trauma simply return to the classroom as if nothing has happened? For the love of our children, we must give them time to return to learning without penalizing schools for performance scores. It is undoubtedly possible that scores may well be lower this year. It is abundantly clear that the interruption of learning that occurred cannot be overcome in a semester or a year. There will be plenty of time for grading and ranking but the time now is for healing, for return, and for learning.</p> <p>After September 11, our children worried about the next attack. They worried about their parents. They did not, however, worry about their schools. Schools remained places of refuge. Schools remained opened. It is not to lessen the horrors of the attack. As a military mother, I know the very real threat of terrorism. But it was not the terrorist who shuddered our schools. It was the invisible force of a virus. In the closing of our schools, children lost what is often their safest place. I stand for the accountability waiver. It is not a waiver of our responsibilities to our children. It is not a waiver to educate, to nurture, and to guide. It is rather a momentary pause in determining what qualifies as success or failure in education as we recover from the pandemic. We do not score a toddler learning to walk. We do not place the toddler in a marathon. Rather we applaud each step the toddler takes.</p> <p>In times of recovery, the measure of success is the safety the child feels to return to the classroom, to show up for learning, and to try again. Let us value the child. Let us value every school as refuge to every child. Let us learn again. For the sake of healing and learning, let us pause our ranking system. Let us focus first on the return, on re-opening fully. There is a time for every season and this season is unlike any that any of us have experienced in this lifetime. This season is a time for healing from a collective trauma that impacted every child, every teacher, and every school district. There is time for grading but the time for healing is now.</p>
649	12/13/21 9:54:23	Teacher	Strongly Support	As a society, we are still in the middle of a pandemic. Our students have been deeply impacted by COVID-19. They are behind academically, emotionally, mentally, and socially. This year, our students should not have the stress or pressure of a state exam. Educators are working to ensure students develop the skills they lost or did not develop due to the pandemic. By granting the proposed waiver, our school systems can focus on the needs of our students.
650	12/13/21 10:01:19	Teacher	Strongly Support	Many students were in situations due to the pandemic that have left them with a lot of chopping instruction and unfinished learning. It would not be accurate or paint of true picture of what the students are capable of to use that data.
651	12/13/21 10:04:01	Teacher	Strongly Support	<p>This year, state tests and accountability measures will not give us an accurate picture of student achievement. In fact, they almost never do! It has been proven time and time again that the scores on these tests can be easily predicted just by looking at socioeconomic status.</p> <p>It would be a travesty to subject students to testing after missing nearly 2 years of schooling, making do with remote and going through constant school closures due to COVID-19 cases. Please consider submitting a waiver to exempt our students in New York from state testing this year.</p> <p>Please also consider extending the waiver to not only cover the ELA/Math exams, but the NYSESLAT exam as well.</p>
652	12/13/21 10:09:59	Teacher	Strongly Support	We are seeing the effects of the pandemic in classrooms. While I understand the need for accountability, I do not think it is fair to base decisions and funding on test scores that would not take into consideration the effects of the pandemic.
653	12/13/21 10:23:00	Principal	Strongly Support	The pandemic has wreaked havoc on teaching and learning. Teachers, administrators, and parents are working tirelessly to make up for the lost in-person instruction that occurred as a result of the school shutdown in 2020 and the ongoing quarantines that are required due to positive COVID cases. It would be a great injustice to evaluate schools using typical measures during such an atypical time.
654	12/13/21 10:26:32	Teacher	Strongly Support	With all that students and schools have been through, it is completely unrealistic to expect them all to be able to successfully complete Mathematics courses. Even with prioritizing, and extra math lab classes, students have been so frustrated with learning on line, they are struggling with many concepts. Thank you.

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655	12/13/21 10:33:02	Teacher	Strongly Support	Attendance continues to be a major problem. Students are missing weeks at a time and came to us years below grade level to begin with. We are teachers, not miracle workers.
656	12/13/21 10:34:40	Principal	Strongly Support	Educational research has long stated that there is a huge vocabulary gap between socioeconomic classifications prior to the pandemic. If research was conducted on the impact of the pandemic on the "vocabulary gap", I hypothesize it would be even wider. Adding the extra burden of "accountability" on the state testing further stresses the entire school community. Please consider the waiver for the 2021-2022 testing cycle.
657	12/13/21 10:43:34	Teacher	Strongly Support	Please consider the needs of our students and educators and do not use the state testing as an accountability measure.
658	12/13/21 10:44:55	Teacher	Strongly Support	We are in the midst of a pandemic and state test should not be used at this time! Children and adults are at an all time high for anxiety and depression. We do NOT need to put more stress on all stakeholders. Please consider the health and well being of each person involved. Testing is great when it can be used to show accurate data. With quartines, illness, lack of interventions, as well as lack of internet and computers I believe the data would be ineffective at this time.
659	12/13/21 10:44:56	Teacher	Strongly Support	Our focus now should be on our students' well-being and what they need to be successful; it should not be on checking the boxes for some standardized test prep.
660	12/13/21 10:46:12	Principal	Strongly Support	Due to the constant need for PCR testing and awaiting of results, students are missing direct instruction on a continuous basis. Hence there are breaks and missed learning opportunities. Many families are dealing with illnesses and loss of income due to protocols that keep kids out of school and as a result parents out of work.
661	12/13/21 10:47:24	Teacher	Strongly Support	In light of the high absentee rate, and number of students who are lacking skills from earlier grades due to pandemic education, it would be wise to postpone using state test scores to evaluate teachers and schools this year.
662	12/13/21 10:48:10	Teacher	Strongly Support	The pandemic has impacted schools deeply. Staffing shortages have caused schools to patchwork support for students and they are working day by day. There are other measures of data that can be used to measure student progress, ones that are more authentic to the instruction that is happening in schools daily.
663	12/13/21 10:48:17	Teacher	Strongly Support	This year has brought us a different set of challenges. Teachers are doing the best they can to service the students and community in ways that it was not necessary before. Our jobs have changed and what we expect from our students in form of growth should not be measured with tools that were designed using measures of pre covid educational system. If we are to proceed in a just matter, these tools needs to be carefully looked at.
664	12/13/21 10:52:36	Teacher	Strongly Support	Learning gaps from the last 18 months will impact test scores
665	12/13/21 10:54:59	Teacher	Support	At this time students are struggling to catch up from the COVID remote learning period and don't need to be stressed out by the standardized testing scores at this time. Let our children learn and catch up in their gaps.
666	12/13/21 11:13:10	Teacher	Strongly Support	We are discovering only now some of the issues that seem to have affected our students because of remote learning, particularly in students in 9th and 10th grade. The issues have complicated our work to such an extent that I believe that this entire academic year might better be considered a recovery year.
667	12/13/21 11:13:46	Teacher	Strongly Support	As a mathematics teacher, I am seeing significant gaps in what is supposed to be prior knowledge for students as they enter my class. As a result, we are tasked not only with our own curriculum, but with re-teaching (or in some cases teaching for the first time) concepts, lessons, and units that are necessary for students to be able to move on in higher level mathematics courses. This will have an impact on how much new material can be introduced as well as the amount of time left at the end of the year to adequately review/prepare students for Regents Exams.
668	12/13/21 11:19:42	Teacher	Strongly Support	How fair is it to count testing scores against school and teachers when students are "behind" due to the pandemic? If we have to be sensitive to our students and their mental status during all of this, shouldn't we do the same for the teachers?
669	12/13/21 11:24:21	Teacher	Strongly Support	The children are currently stressed out enough and working to catch up with their learning from last year!
670	12/13/21 11:46:15	Teacher	Strongly Support	I support the waiver request due to the pandemic.
671	12/13/21 11:53:48	District Personnel	Strongly Support	We will continue to provide support models that encourage growth for our students and the critical work to to help students catch up will continue.
672	12/13/21 12:02:36	Teacher	Strongly Support	We know there are gaps so it seems extremely unfair to give an assessment based on grade level standards when we know many students are performing below grade level. Think about the effect that will also have on their social emotional well-being.
673	12/13/21 12:11:26	Teacher	Strongly Support	State testing is a poor indicator of student learning at any time, but especially during a pandemic.
674	12/13/21 12:24:26	Teacher	Support	This pandemic has certainly been difficult for students and educators. It doesn't make sense to use data that isn't fair. There are several factors like attendance, internet accessibility and mental health.
675	12/13/21 12:32:01	Teacher	Strongly Support	The 2021 school year has been worse than last year, in many cases. I teach Regents Science courses and because of the quarantine mandates, there will be many students who are lab ineligible if the rules don't change. Please treat this year as you treated the other pandemic years and remove the mandatory testing requirements. At minimum, please remove the 1200 minute lab requirement. It is impossible to meet. Thank you.
676	12/13/21 12:34:45	Teacher	Strongly Support	Let's give the students their fair chance at recovery.
677	12/13/21 12:34:53	Teacher	Strongly Support	The gaps and obstacles that we face this year are even more prominent than last. As students return to our classrooms after 18 months, we see more time spent on developing routines and skills needed to succeed in a physical classroom. I also lose up to 15 class periods this year as a result of district mandated "mask breaks". To make any major decisions using this year's data would be a disservice to the teachers, students, and districts at hand.
678	12/13/21 12:40:16	Superintendent	Strongly Support	Our district and districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. At [REDACTED], we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request.
679	12/13/21 12:42:38	Teacher	Strongly Support	Given issues regarding equal access to internet and technological devices during online learning, I support a waiver on NYS assessments being used to rate school progress and or improvement. There were considerable gaps in wifi services and availability which had a negative affect on academic learning.
680	12/13/21 12:44:24	Teacher	Strongly Support	Despite the fact that our school district is "in school" five days a week, there is still an incredible amount of disruption of class time due to quarantine protocol & positive test results, not to mention the social-emotional strain the pandemic has put on students as they deal with family and friends impacted by this disease. A state test will not help students focus more on their academic responsibilities but rather will only add to their already heightened stress/anxiety levels.

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681	12/13/21 12:47:39	Principal	Strongly Support	I believe strongly in accountability, but only in systems that are more controllable than our current system. While quarantines are at a high level, students and teachers do not have a consistent and fair opportunity to deliver, practice and assess student understanding and achievement.
682	12/13/21 12:56:19	Superintendent	Strongly Support	Many of our students are having to quarantine and at times the virtual supports are not equitable. However, we do provide additional after school support for our students. Regardless, the SEL needs outweigh the academic needs.
683	12/13/21 12:58:05	Teacher	Strongly Support	Covid has greatly impacted, and continues to have an impact on, teaching and learning in ██████████ public schools over the 2019-2020, 2020-2021 and 2021-2022 school years. Student growth, learning and achievement have been affected in so many ways and by so many variables. Students have been traumatized by this pandemic in so many ways. Teaching and learning have been disrupted and interrupted immeasurably. It would not be fair to attempt to assess our students using test scores or other accountability measures during this time period.
684	12/13/21 13:05:25	Teacher	Strongly Support	As a teacher and a parent of school age children, I feel that expectations during this pandemic are long overdue for being adjusted. The attendance piece cannot be controlled, as long as those in contact with Covid positive people must be removed from school for 10+ days at a time. Then you have to consider that once they are allowed to return to normal, they are confronted with differing opinions of others and in some cases treated differently by those who were friends prior. The Social Emotional toll this takes on our students and children compounds an already difficult situation, causing the child to be distracted and fall farther behind. The possibilities of how this current situation affects our students is endless and therefore should be considered a large reason why the waiver request should be granted.
685	12/13/21 13:08:10	Teacher	Strongly Support	If student scores are waived, are teacher observations also waived?
686	12/13/21 13:15:13	Teacher	Strongly Support	Even though the students are in school full-time, this is still not a normal year. Wearing masks all day has a negative impact on student involvement and engagement, thus hurting their academic performance. Also, many students have had their education disrupted by being on quarantine, and that is likely to get worse through December and January.
687	12/13/21 13:17:27	Teacher	Strongly Support	To whom it may concern: The past 2 years have been extremely difficult for both educators and students. The emotional and educational damage the isolation has cause has stunted the students' growth in their behavior and in their ability to be students. I teach 7th grade math and the gaps that I am seeing are going to take years to fill in. We are not in good condition yet, but I am hoping by the end of next year we will see more of a return to normalcy. Thank you, ██████████
688	12/13/21 13:28:06	Teacher	Strongly Support	I'm not sure how anyone can use the past two years as an assessment, especially when dealing with our younger population who have just struggled to engage with normalcy of any caliber. It is preposterous to think for an instant that learning as it is intended occurred as any of us would've liked. Between absences due to quarantine, or worse yet, full blown Covid, and shortened school weeks due to cleaning mandates, our students were supposed to 'learn' through technology.... this did not occur as many would've hoped and we all know it. Our rural students were put at a huge disadvantage due to lack of internet, lack of devices, lack of home structure to enable the learning. Let's be honest with ourselves, the pandemic hurt everyone... but our young learners were hit the hardest. Let's not penalize those who fought to help our students by punishing the efforts put forth during a most challenging time. Thank you for your consideration and time.
689	12/13/21 13:29:52	Principal	Support	This has been a difficult year for sure. Trying to track students down has been a challenge and then reengage them has been tough as well. We're dealing with students that haven't been in school in 2 years and have been struggling socially/emotionally as well.
690	12/13/21 13:30:37	Teacher	Strongly Support	It has been very difficult to teach a New York State Regents class and lab during the pandemic. Students are out weeks at a time, students are held out by their parents and the data gathered from a Regents exam would not represent the actual learning going on. Students and teachers already have high rates of anxiety from Covid-19. The Regents exam only increases the stress and anxiety. It is just not right.
691	12/13/21 13:36:04	Teacher	Strongly Oppose	mask wearing should stay, as rates of covid are rising lately and I would rather not impact my elderly associates. The testing mandate is OK to stop, but not the masks.
692	12/13/21 13:44:26	Teacher	Strongly Support	The COVID pandemic is not over and it continues to impact our teachers, students, and families. The challenges we face continue, and therefore New York state should not use our 2021-2022 state test scores to assess our schools. I am in strong support of this waiver, and believe that instead of assessing our schools using metrics that don't make sense, we should focus our energy on providing support that impacts teaching and boosts student achievement.
693	12/13/21 13:46:08	Teacher	Strongly Support	This waiver is very much needed and it is the fair thing to do to better support school communities that are in the process of getting back to normal.
694	12/13/21 13:51:52	Teacher	Oppose	Despite the challenges, all schools should be held accountable immediately. Until they are, schools will continue fostering low expectations for learning.
695	12/13/21 13:54:30	Teacher	Strongly Support	This school year has been more challenging than last year as COVID continues to ravage the area. Students in my district have a low vaccination rate and have missed 20 to 30 days of school because of quarantine.
696	12/13/21 13:55:19	Teacher	Strongly Support	We are in full support of the waiver.
697	12/13/21 13:57:04	Teacher	Strongly Support	We are working very hard to catch students up from the last year and a half of remote learning. There are many gaps, which is difficult in a subject like math where everything is cumulative. Before I can teach my curriculum, I need to backtrack to previous year's material. In addition, we have had many students out for isolation and quarantine - some multiple times. We are doing the best that we can, but it will take more than one year to get students back where they need to be.
698	12/13/21 14:03:09	Teacher	Strongly Support	Once again, Covid is interrupting the educational experience. Too many kids are getting quarantined again and missing up to 10 days at a time. They are assigned work, but are on their own and their educational experience is being damaged once again this 2021-2022 school year. To give an assessment for the sake of giving it is both fairly useless as well detrimental to both the mental health of the students and the educators. We are doing our best to teach students and increase their knowledge, but Covid is still damaging the whole process everywhere we turn.

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699	12/13/21 14:05:29	Teacher	Strongly Support	"Our district and districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. At [REDACTED] we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request."
700	12/13/21 14:08:48	School Staff	Strongly Support	It is completely unfair to test these students given the pandemics situation.
701	12/13/21 14:09:32	Teacher	Strongly Support	The past two school years have been extremely challenging. Students have been through such a difficult change in consistency and have lost a tremendous amount of quality instruction. Many students are much further behind than they should be.
702	12/13/21 14:14:33	Teacher	Strongly Support	High stakes testing is not the answer to measuring student academic success.
703	12/13/21 14:20:17	Teacher	Strongly Support	These tests are unfair to Special Education Students in general and specifically during a pandemic.
704	12/13/21 14:20:57	Parent	Strongly Support	The pandemic is going strong and standardized tests are making things difficult for educators
705	12/13/21 14:21:54	Teacher	Strongly Support	Standardized tests are unfair in a pandemic to everyone
706	12/13/21 14:22:27	Teacher	Strongly Support	I strongly support the waiver as our students have been struggling throughout the entirety of this pandemic and should not be held to the same standards from before the pandemic. They have struggled in so many ways and as teachers, we have struggled to meet the needs of our students. We are placing unfair expectations on our students if they are required to meet the same exact standards when they are often legally kept out of school for quarantine mandates.
707	12/13/21 14:25:38	Teacher	Strongly Support	We are still in the midst of a pandemic. Emphasis should be on social emotional well being, getting kids reacquainted to being back in school and addressing students' learning gaps-needs. All members of school community have been traumatized by the pandemic. There is no need to put added stress and burdens on exhausted teachers and students. There's so many flaws already with high stakes testing. It can wait and address issues in time. Not now. Now is the time to heal, readapt and readjust to get used to being functional and thriving members of school communities.
708	12/13/21 14:27:46	Teacher	Strongly Support	The pandemic has severely disrupted the education and well being of our children. From school closures to rolling quarantines to all day mask-wearing, this year has not been ideal. Students are languishing, and the tests, stressful in a regular school year, only cause more stress during a period of time when we are supposed to be considering student emotional and social well being. When masks come off and students are not subjected to quarantines, when the stress of getting sick from COVID disappears, then we can consider assigning students to accountability levels. What we know already is that the tests do a really good job of showing a child's mother's level of education. They do a good job of showing how wealthy a district is. Do we really need to pile more stress onto students when we know what the results will be? They will be an inflated version of what we usually see in a normal year's results.
709	12/13/21 14:30:42	Teacher	Strongly Support	COVID has severely impacted student performance.
710	12/13/21 14:31:10	Teacher	Strongly Support	Although we are back to school full time, students have been struggling significantly to adapt to the normal school year. As a high school teacher, I have encountered more disciplinary issues in the past 3 months than in the past 3 years. Much of this seems to be due to the unreasonable stress put on students over the past two years without any comprehensive means of processing that stress. To judge these students on the same standards used pre-pandemic would be inappropriate.
711	12/13/21 14:33:11	Teacher	Strongly Support	As a result of the Covid Pandemic, the students at our school are all behind grade level and teachers are struggling to bring everyone up to where they need to be. Using data from this school year would be detrimental and unfair to our students.
712	12/13/21 14:34:07	Assistant Superintendent	Strongly Support	Based upon the interruption, disruption, and alternative learning that occurred during the 2020- 21 school year due to the COVID-19 pandemic, students are still lagging behind with regards to their baseline skills, the learning process, and their academic growth as compared to where their counterparts from previous years would typically be. This is evident not only from observations provided by teachers and staff members but also from studies and experts that have been researching and reviewing this impact. Therefore, we feel strongly that an accountability waiver for the 2021-22 school year would be fair, logical, and appropriate. Some evidence of the COVID-19 impact on learning includes: - [REDACTED] [REDACTED]: --> "There's a lot we don't know yet, but we do have scattered studies and some standardized test data from various states. And those pretty consistently show that kids knew less and performed less well on tests at the end of the last school year than kids in the equivalent grades have performed in previous years." [REDACTED], professor of education at the Harvard Graduate School of Education - "What New Data Reveal About Students' Math and Reading Performance Right Now", [REDACTED] [REDACTED] --> The report, from curriculum and assessment provider Curriculum Associates, found that fewer students are on grade level in early reading and in upper elementary and middle school math than in years past. --> "Unfinished learning has taken place in every elementary and middle school grade, 1st through 8th, reading and math. Unfortunately, those students who came into the pandemic at the greatest risk are at the most danger of not catching up from the dire consequences of the last 18 months." --> "Unfinished learning is not new for educators," said [REDACTED], Curriculum Associates' chief inclusion officer. "But for individual students, this sort of compounded unfinished learning can have rippling effects over performance, grade placement, and long-term academic success."
713	12/13/21 14:34:52	Teacher	Strongly Support	So many students lost a year to a year and 1/2 of direct instruction. We are doing our best to catch them up, but they are overwhelmed and so are teachers. This is not a typical school year, the next set of students who will have a "typical" experience are the current Kindergarteners in the 2021-2022 school year. Those students are in school fulltime with direct instruction and feedback from teachers.

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714	12/13/21 14:36:14	Teacher	Strongly Support	In a year where students are out for weeks at a time it seems unfair to penalize schools. In more affluent districts parents are more likely to make sure students are working while quarantined while in our lower income schools students often return to school having done little to none of the assignments posted online. The nature of students being in person one day and quarantined the next is chaotic and difficult to provide meaningful instruction.
715	12/13/21 14:40:27	School Staff	Neither Support nor Oppose	I have no response at the moment
716	12/13/21 14:41:33	Teacher	Strongly Support	As a classroom educator in New York, I do not support a return to the use of high-stakes test results for school accountability this year. Daily I watch my students struggle with rigorous tasks that I scaffold for them. They struggle despite all that I do to make the learning experience accessible for all students. They struggle because I cannot mitigate all that they are struggling with because of the pandemic. Some have to stay home with younger siblings who were on quarantine because they are not yet fully vaccinated so my students missed attending their classes. They suffer the emotional toll of isolation and are trying to reintegrate in a language that is not their home language and are working exceptionally to acquire their new language and content simultaneously. They struggle as they are carrying burdens not meant for young teenagers because adults have not done enough to ensure supports such as counseling be available for all students. They show so much promise and most are showing up every day ready to work and continue to plug away despite their discouragement and worry about the state tests that they know are in their near future. Please let me help them learn and ensure that NY will not use 2021-22 school year data to identify or remove schools from identification as Comprehensive Support and Improvement Schools and Targeted Support and Improvement Schools
717	12/13/21 14:41:44	Teacher	Neither Support nor Oppose	Not enough information to make a determination.
718	12/13/21 14:42:23	School Staff	Strongly Support	due to covid there should be a waiver, we were put behind due to outside influences not a fault of the school, teachers and staff, it left us in a disadvantage and behind.
719	12/13/21 14:42:56	Teacher	Strongly Support	I think that because students have been out of the classroom for most of the year, the data might be a bit skewed.
720	12/13/21 14:43:16	Teacher	Support	N/A
721	12/13/21 14:44:00	Teacher	Strongly Support	Making judgements based on the past year would be futile and would certainly show skewed data.
722	12/13/21 14:49:53	Teacher	Strongly Support	Our students have had so much trauma over the last two year. Some students continue to have gaps because of quarantine and students have learning loss of 2 years or more. Giving the students a high stakes test which is not CRSE revised will continue to facilitate the trauma. We need to focus on our students SEL health and not testing.
723	12/13/21 14:50:45	Parent	Strongly Oppose	Every effort must be made to identify gaps and learning and hold those, who refused provide kids with in person learning accountable!
724	12/13/21 14:51:52	Teacher	Strongly Support	High stakes testing when students are at their breaking point will tell us more of what we already know. Let students enjoy the little bit of school they can have to develop and grow into socially competent people with morals before making determinations about failure. Every teacher i know has been working overtime to keep kids engaged and teaching to the test is not the way.
725	12/13/21 14:54:01	Teacher	Strongly Support	Please consider that many students are suffering with familial stressors and not able to fully attend in class. Students who are quarantined and/or sick are missing many days of school, and many had gaps before the beginning of the 2021 - 2022 school year. We (Teachers) are working hard to reach out to students at every level both in and out of the classroom, and the opportunity to focus on gaps and individual student needs far outweighs the need to penalize schools for their lack of progress on state tests at this time.
726	12/13/21 14:55:11	Teacher	Strongly Support	The pandemic isn't over and things are still not back to normal. These kids still need time to heal
727	12/13/21 14:55:29	Teacher	Support	State exams should NOT be used as accountability measures at this time. State exams are biased and students -- and teachers -- are still reeling from the pandemic. My best, [REDACTED]
728	12/13/21 15:02:59	Teacher	Strongly Support	NA
729	12/13/21 15:06:35	Teacher	Strongly Support	Students are being quarantined for weeks at a time, with not equal opportunities for education, as they are not in the classroom.
730	12/13/21 15:07:17	Teacher	Strongly Support	We are still living through the uncertainty of the pandemic. Cases are actually increasing. Students did not have a normal school year 2020-2021 and this year even though it's better, we are still not back to normalcy. Students have gaps from the past two years. Please give us a change to close these gaps and don't penalize us by judging our schools and our work based on a test.
731	12/13/21 15:22:36	Teacher	Strongly Oppose	The wording on this is so confusing that I have no idea what I should say! I initially said I strongly agree but now I am strongly opposed. I guess that puts me somewhere in the middle.
732	12/13/21 15:28:10	Teacher	Strongly Support	With the learning loss as a result of school closings due to COVID-19, instructional staff across the state are struggling to bring students were they should be by this time of the year. It's unrealistic to expect them to. This waiver will relieve the stress on students and teachers.
733	12/13/21 15:55:19	Teacher	Strongly Support	I can't even finish curriculum and so many kids are sick or quarantined
734	12/13/21 16:01:08	Principal	Support	NA
735	12/13/21 16:20:55	Teacher	Strongly Support	It is critical that the Department mitigate rather than exacerbate stress on fragile communities that need time to recover and heal from the pandemic. The risk of marginalizing both stakeholders and subgroups of students by making premature determinations is a significant concern. By removing the additional stressor of having academic performance and growth inaccurately identified through premature and invalid accountability determinations, the Department will be better positioned to partner with and support schools and districts that most need assistance.
736	12/13/21 16:46:05	Teacher	Strongly Support	Not only will the state exams further stress the students' deficits in their mental health, they don't properly prepare students for life after high school. The labor demands of this country right now do not match what is assessed on the Regents exams. I teach Financial Algebra and in my perfect world, the Regents would be cancelled forever and my class would become Algebra 1. Not every student needs to calculate a line of best fit to predict future data, but they will all have a credit score.

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737	12/13/21 16:48:40	Teacher	Strongly Support	Students are struggling with a learning gap and social emotional declines from being home remotely for a year and a half. It is unfair to hold them to the same expectations as students who never had a learning gap in prior years. It is highly stressful for children readjusting to in person full time school. I have seen first hand the behavioral immaturity and educational struggles with our at risk, ict and enl populations and to add the additional stress of a regents exam is unfair and could do more harm than good. Students who are overwhelmed and trying to become acclimated again, as well as developing new study skill sets for the first time is challenging. At this time, I personally feel students who be mandated to take the exam for the experience of it but it should not be held against them. A second possibility which would also be fair is to lower the passing and college readiness requirements - passing to a 50 instead of 65.
738	12/13/21 16:50:16	Superintendent	Strongly Oppose	I was in favor of this until I learned that it will not include a way for districts currently identified to be removed from the targeted list. We were put on that list due to high opt out rates and a small overall number of special education test takers based on statistics from 4 years ago (2017-2018 school year because they had to combine two years due to our small numbers). We have now been stuck in the bureaucracy of the department for 4, going on 5 years, despite showing great improvement in testing rates, scores, and growth scores in all sub-groups. Yet, there is no mechanism for us to be removed from the list. This waiver is great for schools not identified but greatly harms districts that currently are. If you could please find for a way for districts in our predicament to find a way to somehow prove our way off of the list, we would greatly appreciate it. It is demoralizing to a staff that never should have been put on this list but have worked very hard to improve anyhow, only to be told we are on it again no matter what (for the second year in a row).
739	12/13/21 16:59:44	Superintendent	Strongly Support	While we strive for equality in all we do, our rural community has been hit particularly hard by COVID medically, socially, economically, and by default, educationally. Even our outstanding work to support students and families has not fully withstood the deep impact felt by many citizens as a result of the pandemic. Furthermore, as a high-mobility district closely connected to [REDACTED], families have experienced a wide range of supports (or lack of) over the past 21+ months in various parts of the world. Accountability measures can not begin to reflect the vast differences in experiences within our school district, and should therefore not be leveraged to make high-stakes determinations regarding school improvement categories. Current performance levels will not only be incomplete, any comparison to prior year and/or state or regional performance will not adequately represent student growth since March of 2020. This waiver provides [REDACTED] and all schools with the much-needed time to implement ongoing systems of support for time lost as a result of COVID-19. Thank you for your work to provide a solid common-sense accountability system that supports growth rather than labels inequitable experiences as systemic failures.
740	12/13/21 17:12:46	Other	Strongly Support	Testing data is useless in the midst of a pandemic and using the data for evaluative assessments is worthless. We should be searching for assessments that inform instruction- [REDACTED] have excellent suggestions
741	12/13/21 17:13:47	Teacher	Strongly Support	These past two years have been an enormous challenge for both teachers and students. We do not need to state the obvious.....there will undoubtedly be factors that hinder the expected growth. Let's support everyone with the resources necessary to bring students to where they need to be to demonstrate they have achieved the stated goals. Give them tools rather than hammering them for their inability to reach state expectations.
742	12/13/21 17:17:48	Teacher	Strongly Oppose	I would like the current data reflected.
743	12/13/21 17:21:40	Teacher	Strongly Oppose	Are are in school everyday and working hard to show growth.
744	12/13/21 17:24:35	Teacher	Strongly Support	This Global Pandemic has severely set our students back. I do not believe districts should be penalized because of the inconsistencies that occurred during remote and hybrid learning last year. We are doing the best we can to fill these learning gaps, but it is going to take time. Data from this year should not be used towards the state accountability requirements.
745	12/13/21 17:29:57	Principal	Strongly Support	In these unprecedented times, teachers and administrators are focusing on what matters most - meeting the social and emotional needs of our students given the trauma they have and continue to face. Educators across the country are seeing that students' executive functioning skills need support. Time management, task completion, even simple acts like arriving to class and staying in class are presenting as bigger challenges for out youth. This is not to say that high academic standards will not remain. It is only to say that schools need to know that they have the ability to meet the individual learners where they are at and work best to meet their needs without the added fear falling short of certain measures. I support this waiver and feel it is of the utmost importance.
746	12/13/21 17:39:19	Union Leader/Representative	Strongly Oppose	During a very stressful time in education with COVID-19 still in our midst, it is unfair to place districts again in those positions. I also disagree because small districts suffer from the methods used for calculations that place them on lists.
747	12/13/21 17:44:53	Teacher	Strongly Support	I think high stakes testing should not be used to evaluate teachers, students or schools this year!
748	12/13/21 17:44:57	Teacher	Strongly Support	High stakes testing is the wrong idea for these times. Some students have lost family members or their homes or lifestyle they were accustomed to. We are still in a pandemic and adding undue stress for students and schools is not the right thing to do.
749	12/13/21 17:48:22	Teacher	Strongly Support	State tests do not represent the amount of growth or knowledge my students gain over a school year.
750	12/13/21 17:53:14	School Staff	Strongly Support	The students have such tremendous deficits when it comes to SEL.
751	12/13/21 17:54:05	Teacher	Strongly Support	Students are trying to make up for 18 months of interrupted learning in addition to learning a year's worth of new curriculum. It is unfair to judge schools based on these assessments when extreme gaps in learning have occurred due to a world wide pandemic.
752	12/13/21 17:55:15	Teacher	Strongly Support	High stakes tests put too much stress on students and teachers as well. This is intensified by the current pandemic we are still in.
753	12/13/21 17:58:41	Union Leader/Representative	Strongly Support	The role of the educator has changed so much in the past two years. It seems almost unthinkable to concentrate on tests and accountability systems based on test scores when students are in such crisis/need on a personal level.
754	12/13/21 17:59:13	Teacher	Strongly Support	It's another unfair year which only further highlights the disparities between the districts that have resources and those who do not in terms of being able to provide equitable access to learning opportunities for all students.
755	12/13/21 18:02:22	Teacher	Strongly Support	The learning loss this year is real. Any data which is collected this year would be worthless.
756	12/13/21 18:05:15	Superintendent	Strongly Support	To impose or advance accountability designations given the hardship and inequities of the pandemic would be a disservice to the students, staff, and schools that are prioritizing personal and community health over academics, at a time when that is exactly what they should be doing.
757	12/13/21 18:08:54	Teacher	Strongly Support	All regents also
758	12/13/21 18:13:25	Teacher	Strongly Support	Enough with the tests!

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759	12/13/21 18:26:14	Union Leader/Representative	Strongly Support	Do you have any idea what it is like to teach during this pandemic? To base judgements on the data collected during this challenging time for educators and students is meaningless and unfair. We are all doing the best we can to meet the needs of students and families and that is still not enough! Please consider granting this waiver.
760	12/13/21 18:26:21	Teacher	Strongly Support	I teach 4th grade and majority of my students are at the level of thier last grade
761	12/13/21 18:27:52	Teacher	Strongly Support	To begin with, the studies have shown the only consistently valid data from these high stakes tests are the children's socio economic levels. Having said that, to add onto a faulty test, the disruptions of the past two years, and then hold teachers and students responsible, is a cruel use of fraudulent statistics, benefitting no one but those who wish to dismantle public education in this city.
762	12/13/21 18:28:53	Parent	Strongly Support	No one should be punished during a pandemic for systemic inequities in education.
763	12/13/21 18:30:01	Teacher	Strongly Support	Students and teachers are playing catch from a very unconventional 18 months of learning. We now have classes quarantined which is slowing down the pace of our curriculum
764	12/13/21 18:35:55	Teacher	Strongly Support	This is not a normal school year. Schools, staff, and students are still adjusting to being back in-person. It is taking twice as long to get through material since we are focusing on addressing social-emotional needs more than ever before. Students need more individualized support than ever before. Testing is not a fair way to measure our progress.
765	12/13/21 18:36:12	Teacher	Strongly Support	Schools are still trying to recover from last year's effects of Covid as well as new resurgence of the virus. Administration, teachers, staff, parents and students need all of the support available. They do not need the stress of the 2021-2022 accountability determinations looming over their shoulders.
766	12/13/21 18:38:24	Teacher	Strongly Support	Please don't hold teachers accountable for New York State test scores when the pandemic is still going on.
767	12/13/21 18:39:42	Teacher	Strongly Support	We have not prepared students for high stakes tests. We are focused on social/ emotional concerns this year!
768	12/13/21 18:41:11	Teacher	Strongly Support	I feel it would not be a valid assessment due to the gaps in education in the past year and a half due to the pandemic.
769	12/13/21 18:41:38	School Staff	Strongly Support	This pandemic is not over and children in [REDACTED] are still suffering with covid and mental health issues. Anxiety is high among not only students but staff as well !
770	12/13/21 18:43:14	Teacher	Strongly Support	Given the shift in education over the last 2 years due to the pandemic it would be unfair to use this years regents to decide such a community wide issue.
771	12/13/21 18:47:02	Teacher	Strongly Support	I currently have four classes scheduled to take the Common Core Algebra 2 Regents in January. Before September, these students had not been in a physical classroom since March 2020 when they were in their second semester of Common Core Algebra 1 (they were in a 3 semester Algebra 1 course). They also took the first semester of Algebra 2 while remote last year. How is it fair for anyone to be held accountable for these student's Regents scores?! They were not in a physical classroom for 2/3 of their Algebra 1 semesters and for 1/2 of their Algebra 2 semesters. The learning loss is significant. No one should be required to take a Regents this January and no should be rated on these scores.
772	12/13/21 18:47:21	Teacher	Strongly Support	I strongly support the waiver request.
773	12/13/21 18:48:48	Teacher	Strongly Support	Students returning from the pandemic should not be tested when there has been a learning loss. I'm addition, the tests are not differentiated to fit students needs.
774	12/13/21 18:52:31	Teacher	Strongly Support	A year and a half into a pandemic that has not ended with minimal support to help students adjust to the new normal is not the time to rank schools.
775	12/13/21 18:54:29	Teacher	Strongly Support	This is the first time in over 18 months that we've had all of our students learning in person in our buildings. They need time to adjust academically, socially, and emotionally without the added pressure of high-stakes testing.
776	12/13/21 18:55:51	Parent	Strongly Support	Students have been in and out of school again because of Covid. Many of the high school students have never taken a regents exam. This is not the year to start this. Give them the exemption again and count their passing grades for the course
777	12/13/21 19:04:22	Teacher	Strongly Oppose	The students have gained better grades since 2018.
778	12/13/21 19:14:19	Teacher	Strongly Support	The use of test scores for accountability will not provide a true picture of a school. In addition, results are delivered late and not useful to parents or administrators. We should actually do away with testing.
779	12/13/21 19:20:20	Teacher	Strongly Support	Please don't count the tests this year. Our students have been struggling enough with the return to school. To have them focus on these tests will place an undue burden on the kids. If the state cares about students' mental health they way they claim to, they will see that these tests are unnecessary and not needed.
780	12/13/21 19:21:12	Teacher	Strongly Support	This is the first school year fully back from remote learning and the children should not be expected to perform at their best on state testing. It is not right for their mental health as well as their teachers who are being rated on their students performance. This is a year like no other and students returning to the classroom are behind not only academically but emotionally. Allow teachers the time to rebuild their students foundation(both academically and social emotionally) so they are better able to navigate independently in the future. This is not the year for further pressures and anxieties to cloud and deter. Thank you.
781	12/13/21 19:21:35	Parent	Strongly Support	My son only attend 1 year or less of school since 2nd grade. He entered 4th grade this year he excels 4 in math and science but is reading on the end of 3 rd grade. To catch up this year is a understatement. I can't image this year being a main factor into his middle school education. Time is needed to make up for the last year and half.
782	12/13/21 19:24:43	Parent	Strongly Support	As the mother of a special needs child with a hefty iep, I do not think that these tests truly show what a child is capable of. You talk of supports and modifying but every child takes the same test. Ridiculous.
783	12/13/21 19:24:50	Teacher	Strongly Support	I don't think it is fair to assess students during a COVID pandemic year. Some students were at home and had little to no support. In addition, students were not receiving services to help support their needs. All in all, it is not an accurate depiction of the student's abilities or skills with out the proper support that was lacking during the COVID year.
784	12/13/21 19:27:05	Parent	Strongly Support	We are in a PANDEMIC! Testing should NOT a priority. These kids are suffering. We need social workers and psychologists. Social/Emotional health needs to be addressed.
785	12/13/21 19:28:44	Other	Strongly Support	I support the waiver
786	12/13/21 19:29:11	Other	Strongly Support	I feel that evaluating a school's impact on students using only test grades is a poor practice, even in good times. During these times, it borders on ridiculous.
787	12/13/21 19:34:04	Teacher	Strongly Oppose	These kids are so far behind, we really need some indication of how bad it is.
788	12/13/21 19:35:20	Teacher	Strongly Support	This year the students are relearning how to be students in the classroom. They are learning to readjust into social situations. Right now they need to be supported emotionally and gain academically after the pandemic slide.

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789	12/13/21 19:36:20	Teacher	Strongly Support	I have taught over 30 years and this year the children are having the hardest time trying to catch back up. It is cruel to test them. There is nothing worse then making a child who is working hard feel bad about themselves because they are going to struggle on the test. Why would anyone want to stress them out even more?
790	12/13/21 19:39:30	Other	Strongly Oppose	The numbers are needed for data. Taking the exams however the results may be will show the truth. Let it show whatever data it needs to so proper measures can be taken to improve the education system. Don't hide this info and pretend the year didn't happen. In the long run it's best not to skip this year.
791	12/13/21 19:51:06	Teacher	Strongly Support	Students have missed a lot of real instruction over the past two years. This year has been used to play catch up.
792	12/13/21 19:54:54	Teacher	Strongly Support	It is not the fault of the school community we had a pandemic. The kids were not used to learning remotely. Parents are not teachers and off course students are behind academically and developmentally. It will take more than a year to bring them up to level. Therefore, there is not reason for punishing the school for something out of their control.
793	12/13/21 19:59:17	Other	Strongly Support	As a School Psychologist, I interact with students on a daily basis within and outside of their classrooms. Although everyday is as different as every child, I see students continuously struggling. Our students are showing developmental delays, academically and emotionally. We have spent a considerable amount of time developing relationships with our students to help to get them to be receptive to learning. The academic delays are substantial and their emotional needs are considerable. I believe it to be in their best interest NOT to utilize data from the 2021-2022 school year. Their future teachers will be negatively impacted by the "meaning" of the designation at any school in any district and the outcomes of this year may not truly show the effort, dedication and effectiveness of Teachers across New York State. My colleagues in the classroom are challenged in many ways, however they still put forth the necessary efforts required to educate students. I work in a district that has several schools that are designated for school improvement. The additional demands and mandates from administration as well as the constant changes in curriculum, programming and materials have become burdensome to Teachers. This is the down side to school improvement designations and receivership. Eventually it will trickle down to the students. Imagine a school with low student morale because the designation does not necessarily yield the desired result.it appears to have made teaching and learning more challenging. The Pandemic is an unfortunate occurrence in our history. It certainly has added another layer to the teaching profession. The data from this school year should not be utilized to make accountability determinations and school identifications.
794	12/13/21 20:06:38	Teacher	Strongly Support	The standardized tests cannot accurately capture the work teachers and students have been putting in since March 2020. Teachers are spending much more time on social/emotional skills, as well as executive functioning, such as time management, than during a typical school year. These things are all needed to help our students be successful and stay positive. These are skills students will use their whole lives, and these are skills that cannot be assessed using a standardized assessment.
795	12/13/21 20:20:45	Teacher	Strongly Support	Students have been in and out of quarantine due to COVID exposure. There has been a lack of consistency as asynchronous remote instruction is not the same as live or in person instruction. It would be unfair to hold students and schools accountable to high stakes testing when so much of the year has been inconsistent and will continue to be.
796	12/13/21 20:27:26	Parent	Strongly Oppose	There has to be accountability for the childrens education. They are already behind because of COVID-19 but at some point we need to move forward.
797	12/13/21 20:28:23	Parent	Strongly Support	These tests and the regents exams should be eliminated.
798	12/13/21 20:30:55	Teacher	Strongly Support	Students and parents have been socially, emotionally, and academically affected by this pandemic. Attendance is low and/or students are often late. They have come in with significant deficits in learning...especially in writing. They cannot get caught up if they miss school and are often late. Teachers and schools should not be held accountable for all of the circumstances and consequences of this pandemic.
799	12/13/21 20:33:36	School Staff	Strongly Oppose	We need scores to see where these kids are st
800	12/13/21 20:41:51	Teacher	Strongly Support	High stakes testing results do not accurately reflect our students' growth or the work we do with students. This is especially true in a pandemic when our students are in crisis and need support, not assessment and the threat of having their school shut down.
801	12/13/21 20:43:14	School Administrator	Strongly Support	The families who opt to test their children are of the marginalized ones who have been most effected by the pandemic
802	12/13/21 20:43:35	Teacher	Strongly Support	Instead of appropriately allowing students to slowly make they're way back to normal classroom instruction, we have not only continued to shove testing down their throats, but we have even increased the stakes. It should have been automatically a given that schools get an additional year of a grace period too to get students and families back on track.
803	12/13/21 20:44:08	Teacher	Strongly Support	COVID is still with us and affecting our communities. Now is not the time to add the additional pressure of testing. It should be about students not scores.
804	12/13/21 20:45:38	Teacher	Strongly Support	Students have been in and out of school, more so recently in quarantine. The stress levels to make up for time lost is so difficult. State exams only make the time missed more stressful for students and teachers. Graduation requirements with state exams are too much to bear during a pandemic. Drop the exams and let the students learn.
805	12/13/21 20:48:49	Teacher	Strongly Support	Coming back into classrooms has been a challenge for students and teachers alike this year. While I am in support of using tests as a benchmark for learning, we are up against some large challenges to get students up to speed when there was such a disparity in instruction received and instructional time last year. I do not think it is fair to use testing as an accountability measure for this school year given we continue to feel the effects of the pandemic and many students are STILL receiving interrupted learning due to quarantines.
806	12/13/21 20:51:16	School Administrator	Strongly Support	This year continues to be a challenge with classroom closures and individual students/staff having to quarantine. This needs to be considered with any accountability measure.
807	12/13/21 20:51:25	Teacher	Strongly Support	The kiddos are dealing with a lot - a lot! Don't put high stakes testing on them too. Some of these kids have never had a high stakes test - let them ease back into full time in person during this pandemic.
808	12/13/21 20:57:10	Teacher	Strongly Support	The MOST important aspect of education right now is supporting students social and emotional needs, while filling in the gaps that have occurred over the past two years. This "back to normal" approach is dangerous in my opinion and underestimates the work we need to do to rebuild all our kids (and adults) have lost. This does not mean ignore academics! But teacher based assessments are more valuable than tests constructed by people who are not working directly with a specific cohort.
809	12/13/21 20:59:29	Teacher	Strongly Support	Everything can not go back to "normal" when "normal" does not exist...as of yet.
810	12/13/21 21:01:22	Teacher	Strongly Support	If you are going to use Regents exams evaluate quickly parts of curriculum you can not test as with student deficits we don't have enough time to cover correctly. This is very evident in math.

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811	12/13/21 21:04:59	Union Leader/Representative	Strongly Support	Teachers and students are at a disadvantage this year. We have yet again entered another school year that is interrupted by closures. Our students need stability in order to succeed. This is not the year to make it count.
812	12/13/21 21:05:21	Teacher	Strongly Support	Many of my students have missed more days than they have been able to attend this school year due to covid related illness or quarantine. We are understaffed due to shortages of teachers, assistants, aides and substitutes for the same reasons. We are all working our hardest to help students make gains, but at this time it is a struggle just to close gaps.
813	12/13/21 21:11:07	Teacher	Strongly Support	Using test scores from this school year ignores everything that has occurred for the past 18 months.
814	12/13/21 21:11:17	Teacher	Strongly Support	I feel this year has been an adjustment for the students to get involved academically in school buildings. They need this year to be full of learning through fun experiences and not worried about testing situations.
815	12/13/21 21:19:42	Teacher	Strongly Support	The pandemic has caused huge disruptions to the education of all of our students. Many students did not have the support at home to help them stay on top of their school work throughout last year.
816	12/13/21 21:22:52	Teacher	Strongly Support	I believe the high stakes testing is unnecessary, inequitable and does not accurately measure a students knowledge. The use of the tests for data is unreasonable especially during the highly stressful times we're currently in. The tests don't and won't ever help our students.
817	12/13/21 21:26:00	Teacher	Strongly Support	I don't believe it is in the best interests of our students or the teachers and staff supporting them this year to have students undergo the stressful process of taking standardized tests that will be use to judge both the students and their schools. Our students are working hard to recover from the learning loss during the pandemic and the stress of testing could undermine all of their hard work this year.
818	12/13/21 21:27:04	Parent	Strongly Support	It would be absurd to think that children are fully prepared to take standardized exams after many have been learning remotely for nearly 2 years.
819	12/13/21 21:28:26	Teacher	Strongly Support	Thank you for prioritizing the well-being of our children over data.
820	12/13/21 21:32:12	Parent	Strongly Support	I strongly support this waiver request. I think it's important to prioritize the social and emotional health of our children while we are still battling this pandemic.
821	12/13/21 21:33:45	Superintendent	Strongly Support	Support of the waiver will provide great relief of pressures associated State and Federal Accountabilities for school districts that especially serve underprivileged groups of students and communities. School resources of time and human energy are still greatly consumed and monopolized by the work needed to lead and manage of school district through the pandemic. School districts lacking Human Resources are slowly forging out needed tasks to keep schools operating under pandemic mitigations rules and regulations. Administrators in small and medium sized districts are stretched very thin with added responsibility directly associated to pandemic. Thank you for requesting feedback and thoughtful leadership.
822	12/13/21 21:38:22	Teacher	Strongly Support	A waiver is necessary this year due to the significant impacts of the Covid-19 pandemic.
823	12/13/21 21:42:05	Teacher	Strongly Support	The regents exams should also be modified to take into consideration the gaps from the last two years
824	12/13/21 21:46:44	Parent	Strongly Support	Too much testing on kids
825	12/13/21 21:56:29	Teacher	Strongly Support	We have students who have not yet coped with their trauma.
826	12/13/21 22:09:08	Teacher	Strongly Oppose	I strongly oppose this- we have made significant gains and deserve to have them recognized
827	12/13/21 22:24:01	Parent	Strongly Support	Test should only be administered to measure growth. It should not be used to hold students back or to meet graduation requirements.
828	12/13/21 22:26:01	Teacher	Strongly Support	Students have not taken a timed, standardized exam since 2019. It would be unfairly harmful to schools to use this as a performance metric. Students need time to become familiarized with taking these types of exams again.
829	12/13/21 22:36:38	Teacher	Strongly Support	Students have suffered so much loss during these unprecedented times. Many have lost family, friends and other loved ones. Some lost their homes, watched their families become unemployed, have little to eat. They not only endured these tribulations, but also the educational gap from experiencing remote/blended learning. They have experienced enough and are still experiencing the pain. We talk about giving SEL and extra help but never stopping to think about the state tests affect on them.
830	12/13/21 22:42:48	Teacher	Strongly Support	We are still struggling with closing the major gaps caused by remote instruction from the last year and a half. We need the flexibility to fix these issues as needed, not be held to rigorous standards.
831	12/13/21 22:45:13	Parent	Strongly Support	Our children have been through a great deal the last 2 years. They should not be subjected to state testing and the schools should not be held accountable due to education loss from Covid 19. These are unprecedented times and it calls for flexibility and understanding from State Ed and above.
832	12/13/21 22:47:16	Parent	Strongly Support	Given the myriad of issues the covid-19 pandemic has caused throughout our community, state, nation and the world, it is grossly unfair to expect school communities to meet or exceed expectations that are difficult without adding covid-19 to the mix. Our schools and children deserve to have a fair and impartial evaluation of means of showing school improvement.
833	12/13/21 22:57:01	Teacher	Strongly Support	This academic year is an inconclusive year. We have eighth graders who missed their seventh year. We have sixth graders that virtually came from a fourth grade experience right into sixth grade.
834	12/13/21 23:04:42	Teacher	Strongly Support	No additional comments. I support a waiver as students and educators continue to grow and expand upon skills upon this years' current return to the classroom.
835	12/13/21 23:11:07	Parent	Strongly Support	Strongly support to propose the waiver.
836	12/13/21 23:13:22	Parent	Strongly Support	It would be inhumane to use state test results after the most difficult 2 schools years educators, children and parents have had to endure. If you are focusing on trauma informed learning, then you should be cognizant that the administration of state tests would cause increased anxiety in students and educators which may cause non-favorable tests results. This is not best practices and serves of no value at this time. Let's focus on social emotional so student's minds are ready to receive and grow from a proper education.
837	12/13/21 23:32:08	Teacher	Strongly Support	Like so many educators, administrators, support personnel and parents, I am I support of this waiver at this crucial time. Our students and their families have been through so much over the past (almost) two years, this just doesn't seem to be the right time to subject them to more unnecessary stress and trepidation. Thank you for your consideration.
838	12/13/21 23:40:27	Teacher	Strongly Support	Student engagement decreased dramatically due to the covid-19 pandemic. This had a significantly negative effect on student learning. Please keep this important factor in mind when considering the waiver.
839	12/13/21 23:54:11	Teacher	Strongly Support	It's not fair to make kids take these tests and/or count them for the 2021-2022 school year. If they do have to take them, it should be for practice only. Thank you!

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840	12/14/21 0:17:24	Teacher	Strongly Support	There is too much substantive teaching and learning that must be accomplished; taking valuable time and resources to once again "teach to the test" is unconscionable. [REDACTED]
841	12/14/21 4:16:22	Teacher	Strongly Support	These unprecedented times need to be considered as extreme. At no time should test data, attendance data or any kind of number that is truly not indicative of any real world expectations be used against a school or district even during normal years, let alone during this pandemic era. Students, schools and districts are more than numbers and data crunching. In fact, the data crunching and paperwork is one reason I have given serious thought of leaving the profession after 15 years. It is unreasonable and takes time away from my students. Not I, nor a district, should be considered as accountants or accounting firms. The state needs to be more realistic and supportive.
842	12/14/21 4:30:18	Parent	Strongly Support	Focus on kids socio emotional health. Not test scores.
843	12/14/21 4:33:23	Teacher	Strongly Support	Kids. We'd classes and meaningful education. Not tests they need social interaction and a sense of community while they learn. Tests will distract from this focus. Additionally Covid and bussing issues make attendance a challenge and disrupt education. Data from this year will be meaningless.
844	12/14/21 5:03:31	Teacher	Strongly Support	Due to Covid it is unfair and unreasonable to have these tests. There has been too much inconsistencies in the school system and education due to covid.
845	12/14/21 5:31:08	Teacher	Strongly Support	Students and teachers are still not working in a normal environment. Students have lost so much over the past few years, they need time and support to catch up, not more stress and testing. It is not fair to put so much pressure on teachers and students during such a difficult time for all. School is not back to normal. We just had to quarantine 10 classes! Please give us a break!
846	12/14/21 5:56:19	Teacher	Strongly Support	Holding schools and teachers accountable at this point is unfair and unjust. We are all doing the best we can during this pandemic to teach our students whether in-person, remotely or hybrid. Students are struggling emotionally and academically being out of school and placing unneeded stress on them or teachers is ridiculous! Its hard enough to bridge gaps in a normal year, but we are now on the third year of school where nothing is normal.
847	12/14/21 6:00:16	Parent	Strongly Support	It just isn't fair for the teachers. They are trying their best.
848	12/14/21 6:03:50	Teacher	Strongly Support	While these accountability requirements were already deeply, deeply flawed, the Covid 19 pandemic has impacted every aspect of schooling so significantly that we can not rely on the data these measures create. We are still very much in this pandemic.
849	12/14/21 6:10:23	Teacher	Strongly Support	The best thing for children this year is to waive these examinations. Not only are we trying to help them to learn content right now, but we're trying to help remind them of what it means and how to learn in person again. Not only are we handling learning deficits (which will automatically set our students up for failure on these exams) but we are also handling major social emotional deficits in our childrens lives. Please take this petition into very careful consideration as it is needed for this first school year back in a building.
850	12/14/21 6:13:09	Teacher	Strongly Support	Testing should only be a part of it not the whole and only thing.
851	12/14/21 6:20:15	Teacher	Strongly Support	Teachers should also NOT be rated on state assessments this year due to the fact that we are STILL in the pandemic.
852	12/14/21 6:44:08	Teacher	Strongly Support	Students are still traumatized, we are still dealing with Covid absences, the effects of trauma Ave absence on students is enormous. The data would be invalid and useless.
853	12/14/21 6:49:29	Parent	Strongly Support	Schools need more time since 2 years was lost to Covid taking over and affecting everything and everyone on the world.
854	12/14/21 7:02:21	School Administrator	Strongly Support	After coming back from the pandemic, students are emotionally struggling. The stress load of a high-stakes test is not what students or teachers need to move forward socially or academically. I strongly support the proposed waiver.
855	12/14/21 7:15:48	Teacher	Strongly Support	Students are struggling this year. Let's make this year about supporting them, not making them feel less adequate.
856	12/14/21 7:19:57	Union Leader/Representative	Strongly Support	The 2021-2022 school year is one of connection and recovery. It isn't about not holding people accountable for doing their jobs, it is about supporting teachers who ARE all doing their jobs, many times in difficult circumstances.
857	12/14/21 7:43:50	Teacher	Strongly Oppose	Unlike many other districts, ours has been in session full time since the beginning of the pandemic if only for distance learning. We have received training and participated in a full program over the past year and a half. To waive this discredits our training and participation and further diminishes the skills put into practice.
858	12/14/21 7:46:14	Teacher	Strongly Support	Thank you
859	12/14/21 7:48:20	Parent	Strongly Support	I believe NY should be exempt from accountability requirements.
860	12/14/21 7:48:47	Union Leader/Representative	Strongly Support	Due to continuing COVID quarantines and illnesses, students and teachers alike have been absent from school. As such, students are not receiving the required content to the fullest degree. It seems unfair to place accountability measures on school districts that are still struggling with COVID related problems. I suppose the waiver for the 2021-2022 school year.
861	12/14/21 7:58:32	Teacher	Strongly Support	At this time the pandemic is still ravaging our community infecting both students and staff. Keeping our buildings open and in person is our focus. Student performance progress continues to be a challenge as we struggle with meeting the needs of students who are dealing with many social-emotional as well as academic challenges. This school year is not the time to make accountability determinations.
862	12/14/21 7:59:38	Parent	Strongly Support	We are still in the throes of a pandemic of COVID 19, whilst dealing with a tidal wave of mental health issues, around the globe. These evaluation plans that were written in a pre pandemic world offer no true measurement because we are now in a different world. Let's think about what we value and measure that right now. As a parent I value that my kid can go to school, develop his interpersonal skills and learn in a supportive environment. This is what matters most right now, being safe while being together, learning at any rate is bonus.
863	12/14/21 8:00:47	Teacher	Strongly Support	I think our overreliance on state assessment data is unacceptable to begin with and I do not think these should ever be used to place schools on lists or plans.
864	12/14/21 8:03:02	Teacher	Strongly Support	Our students have lost the complete quality education that is normally offered in the [REDACTED] through no fault of their own or that of the school staff & faculty. School district personnel have been focused on the mental health and physical health of our students which has limited our ability to cover the content in the depth we usually do.
865	12/14/21 8:03:06	Teacher	Strongly Support	Since COVID closed schools in March of the 2020 school year and forced most schools into remote or hybrid models for the 20-21 school year, students have fallen significantly behind academically, emotionally and behaviorally. Expecting "business as usual" to resume and simply picking up where we left off is delusional. Schools can't fix and control everything, especially during these unprecedented times and NYSED needs to recognize that.
866	12/14/21 8:04:15	Teacher	Strongly Support	High stakes, deeply flawed tests are counter productive to trauma-based education.

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867	12/14/21 8:10:16	Superintendent	Strongly Support	Given what our school communities have been enduring with educating our students during a pandemic, it is prudent to entertain the State's waiver request on accountability for the 2021-22 school year. We have been blessed to have our students back in school, in person, and we are working very hard to mitigate learning loss.
868	12/14/21 8:10:42	Teacher	Strongly Support	We are still dealing with a pandemic and things are far from back to normal. Many students are dealing with social and emotional issues, and families with financial fallout from what has happened in the last two years. Schools are doing a wonderful job in supporting our students but they have fallen behind and are not on par with prior expectations. Using assessment data to inform decisions is not only cruel, but the results would not represent valid educational data or identify the real issues students are facing.
869	12/14/21 8:10:56	Teacher	Strongly Support	We need to wait so that better data is available. Unfair to all involved to base decisions on incomplete and non representative data. Thank you for soliciting public comment
870	12/14/21 8:12:47	Teacher	Strongly Support	I strongly support this federal waiver request since there were no state tests administered in 2019-20 and only 40% of students took the grade 3-8 exams in 2020-2021
871	12/14/21 8:15:19	Teacher	Strongly Support	Students are not prepared to take a regents exam with the number of days they have missed with quarantining themselves or teachers being out. Gaps in learning from the last 2 years also is contributing to not being able to finish this years curriculum.
872	12/14/21 8:15:21	Teacher	Strongly Support	So many students out on quarantine. It's like a revolving door. We have no virtual option this year. I can't teach them if they're not here.
873	12/14/21 8:20:27	Teacher	Strongly Support	I strongly support this federal waiver request since there were no state tests administered in 2019-20 and only 40% of students took the grade 3-8 exams in 2020-21.
874	12/14/21 8:22:46	Parent	Strongly Support	The current climate of school with so many students and teachers being quarantined does not allow for schooling as normal and therefore the State should not be using Regents or State Assessments at this time to identify schools in need of remediation.
875	12/14/21 8:24:37	School Staff	Strongly Support	End High Stakes Testing NOW !!!!
876	12/14/21 8:25:22	Teacher	Strongly Support	To Whom It May Concern: I teach and live in a district with a large percentage of current and former English Language Learners. Historically, the use of high stakes testing results attached to teacher/school/district performance metrics disproportionately impacts students of color negatively in "normal" times. The impact would be substantially greater during the Covid-19 pandemic. The pandemic has revealed inequities in access to basic resources, including technology. Even in the best-case scenario, students have demonstrated an academic loss during the pandemic. Schools should not offer high stakes testing in a restorative year that is principally based on recovery. Thank you, [REDACTED]
877	12/14/21 8:33:23	Teacher	Strongly Support	I strongly support this waiver because this year has been even worse than last year! It's silly to think that we should be stressing students and teachers out by putting them through a standardized test that has NOT changed due to the pandemic. Students are already "behind" where the test says they should be, it's ridiculous to think that teachers could even have them ready with the insane amount of quarantining that has been happening. This should be a jumping point to fix a broken system! Let teachers do their job of teaching what is appropriate to the students, as well as be there for them in a social/emotional capacity, not just jam a test down their throats.
878	12/14/21 8:36:24	Other	Strongly Support	Good Morning- thank you for this opportunity. I believe more than ever the time is now to change our accountability systems to best match the new ways in which we teach and assess students at the building and district levels. After March 2020, everything changed, hence, our accountability systems should change as well.
879	12/14/21 8:41:09	Teacher	Strongly Support	Our own assessments can determine how to effectively help children. There is no need to waste time, when children have had so much of it missed, administering another test. Teach what they need, not to the test
880	12/14/21 8:46:09	Teacher	Strongly Support	COVID is still affecting students' attendance rates and COVID slide is a real issue that districts should not be penalized for.
881	12/14/21 8:51:19	Superintendent	Strongly Support	While a return to in-person learning has been our focus this year, it has become evident that addressing the mental health needs of our students needs to be our highest priority in how we engage with them while they are with us. A year-and-a-half of hybrid/remote pandemic focused learning has made for a difficult transition back to the full time classroom. Until we can fully meet our students' social emotional needs, any academic performance we measure is neither a valid nor reliable measure of teaching or learning.
882	12/14/21 8:53:30	School Administrator	Strongly Support	The COVID-19 pandemic continues to disrupt the education of our students. While the District has welcomed all students UPK-12 back to school for in-person instruction, there is still disruption due to quarantine and isolation requirements. The good teaching practices that have been implemented over the years have also been disrupted due to the need to keep teachers and students socially distanced. The mental health needs of the community have been prioritized as we have seen (and recognized with survey data) the increasing need for support. This is not limited to students but also includes parents, faculty, and staff as well. Our county is currently seeing the highest infection rates to date from this pandemic. We strongly support this waiver.
883	12/14/21 8:56:37	Superintendent	Strongly Support	I think that it is imperative that we do not make accountability designations based on the 2021-22 school year data. There are too many reasons to list why the data is flawed and will generate more issues and concerns if utilized.
884	12/14/21 8:56:58	Superintendent	Strongly Support	None at this time.
885	12/14/21 9:01:50	Teacher	Strongly Support	This has been the most difficult 2 years of my teaching career and for sure the most difficult for the students in our district. We are a very low-income district with many kids who go home to one or maybe no parents after school. These young kids have very little if any support system at home the school is the only safe place for many of them and they haven't even been able to be here. We are basically holding young kids accountable for things that young adults have trouble with. We need to take a step back and reevaluate what is important and how we can give these kids the support they need to be successful in the years to come after missing much of the previous two. I believe you already know this and now it is time to show that you understand and do something about it.

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886	12/14/21 9:01:53	Teacher	Strongly Support	SED needs to remember we are coming out of a pandemic with virtual learning that a large portion of the NYS student body did not attend on a regular basis. There are gaps in instruction because of the pandemic, lack of internet access, and a lack of understanding the importance of accessing education by both students and parents. We are also dealing with students that are highly stressed and learning to be in school building again.
887	12/14/21 9:01:57	Teacher	Strongly Support	This year needs to be a baseline reset for everyone. Stop comparing g these kids to their pre pandemic selves. Next year we can compare them to how they are now. Enough is enough.
888	12/14/21 9:07:03	Superintendent	Neither Support nor Oppose	We would like to see how are students are progressing. State assessment data is part of our analysis of student progress and identification of program strengths and areas for improvement.
889	12/14/21 9:07:38	Teacher	Strongly Support	I strongly support this federal waiver request since there were no state tests administered in 2019-20 and only 40% of students took the grade 3-8 exams in 2020-21.
890	12/14/21 9:08:54	Teacher	Strongly Support	The information gathered during the 2021-2022 school year would be another year of heavily affected data due to the ongoing global pandemic. Educators are still working to support students through this crisis and educational data would not support the growth students have been working towards given that they have had two and a half years of education that has been constantly interrupted.
891	12/14/21 9:10:33	Teacher	Strongly Support	Holding our students and teachers accountable to standardized testing especially when SEL is a key component of education, is not equitable or effective.
892	12/14/21 9:10:56	Principal	Strongly Support	I support school accountability. Given the impacts of COVID on schools over the last two years and the ways in which we've had to adapt and pivot I think a waiver is important. This will allow us a baseline year to assess what accountability should look like moving forward.
893	12/14/21 9:15:02	Teacher	Strongly Support	I strongly support this federal waiver request since there were no state tests administered in 2019-20 and only 40% of students took the grade 3-8 exams in 2020-21.
894	12/14/21 9:16:36	Teacher	Strongly Support	The world is still so uncertain for so many students, this needs to happen.
895	12/14/21 9:19:14	Superintendent	Strongly Support	If we are required to assign accountability levels, they will be based on pre-pandemic baselines which is simply not fair to students, teachers, administrators and school districts.
896	12/14/21 9:21:10	Teacher	Strongly Support	Students have emotionally, socially, and academically had their lives upheaved. Anyone that spends time in a school at this moment in time can see the detriment the pandemic has caused. The seriousness of the mental health crisis among teens and children is real. Holding teachers, principals, district leadership, parents, and children accountable for strictly academics at this time would be irresponsible and heartless. We need to give everyone time to sort through what has happened and help all children understand themselves and how to get back on track.
897	12/14/21 9:31:28	Teacher	Strongly Support	I strongly support this federal waiver request since there were no state tests administered in 2019-20 and only 40% of students took the grade 3-8 exams in 2020-21.
898	12/14/21 9:32:29	Teacher	Strongly Support	In a time of building student's self-esteem and knowledge base, tests are not the best use of time. Nor do the test grades give you information to base a teacher's worth on.
899	12/14/21 9:38:18	Teacher	Strongly Support	Many students are struggling academically this year, which is understandable - the last time my 9th graders spent a full year in school they were in 6th grade. Many are dealing with deaths in their family, job loss, and the resultant mental health issues that come with such challenges. Add that to the ongoing pandemic, and this is not the time to push for more assessment of students.
900	12/14/21 9:41:08	Teacher	Strongly Support	[REDACTED]
901	12/14/21 9:41:10	Union Leader/Representative	Strongly Support	Taking into account that there were no state tests administered in 2019-20 and only 40% of students took the grade 3-8 exams in 2020-21, I strongly support a waiver request due to insufficient and inaccurate data.
902	12/14/21 9:42:28	Teacher	Strongly Support	There have been far too many variables to take into consideration for accountability determinations for any district.
903	12/14/21 9:45:13	Teacher	Strongly Support	State Exams should still be on pause for January, based on the conditions related to COVID. Students absenteeism is higher than normal and the strong potential for kids missing exams if out on their Exam day is real, if they are traced or out with COVID they miss exam and have to wait until June.. Lost class instruction based on missed class time related to the VID, also diminishes there chance for passing a new exam (such as Global 10 Regents).
904	12/14/21 9:48:35	Parent	Strongly Support	The data this year will not be reliable or valid due to the current pandemic protocols still in place and the interruption in education affecting many communities still today.
905	12/14/21 9:49:43	School Administrator	Strongly Support	Schools urgently must focus on instruction that meets students' needs, including social-emotional learning. This is not the time to be distracted by test preparation. The data that will result from testing will not help us hone in on instruction - for this, we must use formative assessment that can immediately guide our actions. Moreover, for all the reasons stated in the waiver request, state testing will not yield meaningful information about school quality. I strongly feel that 2021-2022 NYS test data should not be publicly reported nor should it be used for school quality determinations.
906	12/14/21 9:50:41	Teacher	Strongly Support	Covid has resulted in putting a great deal of stress on both teachers and students. Many students have serious deficits in learning due to the pandemic. These facts make the need for a waiver a no brainer.
907	12/14/21 9:57:25	Union Leader/Representative	Strongly Support	The waiver is extremely important. Our students need teachers that are working hard to help students learn and cope with the emotional devastation that the pandemic brought. Teachers need to focus on their students not worry about being targeted for student grades and having their schools put into receivership.
908	12/14/21 9:59:31	Teacher	Strongly Support	Due to Covid Guidelines and Restrictions over the past year and a half/two years, Schools as well as all stakeholders in NYS need approval of this waiver
909	12/14/21 10:00:22	Superintendent	Strongly Support	The 21-22 school year has proved to be more of a challenge than the 20-21 school year. The ongoing nature of the pandemic has led to increased inconsistencies in student attendance. Without remote instruction, students are sent home to work in asynchronous environments. Our students are living through four major issues including the ongoing pandemic and all of its protocols, lack of available work force, and political discontent throughout the nation. The lack of structure and routine in student school day and the unpredictability of the pandemic has had a significant impact on the overall health of our student body and staff.
910	12/14/21 10:01:42	Teacher	Strongly Support	Our district and districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. At [REDACTED], we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request.

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911	12/14/21 10:04:35	Superintendent	Strongly Support	I read the NYSED's Request for a Waiver of Statutory and Regulatory Requirements of the ESEA on behalf of all [REDACTED] in New York State and agree with the rationale for this request in its entirety. The impacts of the COVID-19 pandemic on students and employees are not only significant, but immeasurable. It is, furthermore, likely there are implications of the pandemic that we aren't even aware of yet. Those of us working directly in the field have firsthand experience with the SEL and mental health needs of students and employees that have manifested themselves or been exacerbated by the pandemic. Allowing schools the time and resources necessary to address these issues, within the context of continuing to educate the whole child, is a necessity and, moreover, is simply the right thing to do. Continuing to attach traditional, pre-pandemic accountability measures to schools given all that they have endured and taken on to ensure the care of those within their respective communities seems to defy logic. Moving forward with these systems will likely do more harm than good in schools and communities. Now is not the time to sow discord and dissatisfaction with our public education system. It is a time to reflect on the systems that are in place, evaluate whether they are having the desired impact, assess where our schools and our students are along multiple continuums, trust that our educators and local Boards of Education are working to ensure our students are growing and learning, and design a new system that truly measures the skills and dispositions of our students in a manner that is reflective of the current reality.
912	12/14/21 10:06:10	District Personnel	Strongly Support	I am very concerned about attendance as an accountability measure. The data reflects quarantines and necessary/mandated absences and results in many students being 'chronically absent'.
913	12/14/21 10:07:07	Other	Support	Imthink using data collected from the pandemic years is not indicative or clearly representative of the true needs and conditions.
914	12/14/21 10:07:56	Teacher	Strongly Support	Students are still missing instruction at an increased rate to years prior to COVID. I have had about three days of instruction where my entire class is present. Students are getting quarantined due to cases in school and at home. It is not appropriate to test them on grade level material that they have not been entirely present for and then use those tests to evaluate teachers or school districts. We are all struggling to get through the curriculum. Taking days to test that could be used for instruction seems to be a waste.
915	12/14/21 10:08:01	Union Leader/Representative	Strongly Support	Schools should not be penalized due to lack of data from the pandemic's effect on testing.
916	12/14/21 10:12:01	Teacher	Strongly Support	Students are suffering academically quarantining at home when they are contact traced and negative!!!!
917	12/14/21 10:12:11	Parent	Strongly Support	Due to the continued disruption in learning caused by the pandemic and its negative impact on students, I support the waiver request.
918	12/14/21 10:14:47	Teacher	Strongly Support	Education is a mess. Students are behind. Teachers are trying to catch them up. Many of my students have missed a week+ of school for covid-related reasons. Judging people on test scores will tell us nothing. The gap between high-scoring and low-scoring districts will only increase this year and it is NOT our fault.
919	12/14/21 10:25:52	Assistant Superintendent	Strongly Support	This is a very trying time for all students, staff, and parents. We are into our third school year dealing with COVID19, still with limited operations. We are thankful that our teaching professionals are strong; they keep education at the forefront of their decision-making. Unfortunately, the demands that COVID19 places on the administrators' workload prevent these professionals from having the much-needed time to focus on academics. We are a rural school with staff shortages. Our administrators work daily to keep our buildings open, change schedules, cover classes, attend COVID meetings w/ DOH, contact trace, etc. Yet, we struggle to find time to plan and implement changes to our academic processes. Frustrating, to say the least.
920	12/14/21 10:29:28	Teacher	Strongly Support	These students are way behind in reading, writing and math skills due to the pandemic. No school or educator should be punished for that!
921	12/14/21 10:31:06	Parent	Strongly Support	n/a
922	12/14/21 10:37:19	Teacher	Strongly Support	Regents and test scores should not be included in any APPR or in any plans that school plans are based on. There are too many factors that are out of teachers controls that hinder this to be an effective measure for a school district or an individual teacher.
923	12/14/21 10:43:08	Other	Strongly Support	Teachers, students, and administrators are struggling right now, assessments will not be a reflection of learning as there is so much focus on SEL and measures that are not measurable.
924	12/14/21 10:48:27	Teacher	Strongly Support	After two difficult school years. The education of all our students has not been equal do to Covid. I ask that waiver be granted this school year. Thank you
925	12/14/21 10:51:12	Teacher	Strongly Support	With the pandemic, students have not had a consistent education in almost two school years. I feel it is not right to test them and hold them and their teachers accountable when they have had so many absences.
926	12/14/21 10:52:55	Teacher	Strongly Support	I fully support this issue!!!!
927	12/14/21 10:55:36	Parent	Strongly Support	The first marking period is over and this already has been a very disrupted time for students, especially those in low-income households that continue to face challenges related to some days of remote learning, who are still trying to catch up from what was a very difficult last year of learning. More time is needed for disparities to come back to normal levels, and penalizing students for underperforming scores this year would be unfair and just one more element to continue to hold them back as opposed to help them get back to normal.
928	12/14/21 10:57:41	Teacher	Strongly Support	I don't think state exams should be used as the data putting schools on improvement plans. These exams are not a true assessment of what students can do, and the high stress levels attached to these exams for students and teachers do not help anyone do their best.
929	12/14/21 11:01:23	Principal	Strongly Support	What we all collectively hoped would be a return to a school year in which we (students/staff) were as close to "normal" as possible has been fallen dramatically short by in reality. Staffing shortages make Academic Labs virtually impossible and classes are turned into study halls on a daily basis as we struggle to provide basic supervision. COVID continues to present with challenges on many levels... all of which impact instruction and the day to day operations of a school building. This situation is felt beyond NYS... but speaking as a NYS principal, I would believe it to be not only unfair but completely unrealistic to assign accountability to the 2021-22 school year.
930	12/14/21 11:02:28	Teacher	Support	Testing during a pandemic is not accurate and shouldn't be used. Students have so many gaps both academically and socially created by the pandemic that the test is going to be stressful for them.
931	12/14/21 11:06:54	Teacher	Strongly Support	Students being in and out of the classroom due to COVID and quarantine requirements has had a huge impact on student learning. Schools, teachers, and students need more time before accountability determinations and school improvement identifications using data from the 2021-22 school year are made. In addition, flexibility in the use of Title I School Improvement Funds is necessary.
932	12/14/21 11:08:26	Teacher	Strongly Support	I think that students need this year to get back on track and make up for lose learning and to have a fair chance at the required assessment. No students, school, or teacher should be held responsible for this year due to lose of learning and impeded socialization that was caused by the pandemic that is still on going and is still impacting learning and our students.

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933	12/14/21 11:08:40	Teacher	Strongly Support	Students have not caught up yet from the decrease in instructional time since Covid began - it is not fair to evaluate them or test them on rigorous standards this year or judge them on where they should be based on grade level. Thank you
934	12/14/21 11:10:22	Superintendent	Strongly Support	Although we are in-person, students are in and out of school quarantining and isolating, like a revolving door. Not only will these absences impact the administration of 3-8 testing and Regents, but they are also significantly impacting the continuity of instruction even though the district is providing these students with remote instruction. Some students are too sick to participate. Districts are trying to focus on social-emotional wellness, we continue to be in the throes of a pandemic, and cannot focus on test scores and accountability.
935	12/14/21 11:16:25	Teacher	Strongly Support	Many of my students are constantly quarantining due to several confirmed cases of COVID-19 in my school. As a result, this has delayed their learning process.
936	12/14/21 11:16:47	Parent	Strongly Support	I am responding as a parent of three children- 2 elementary and 1 middle school. This year continues to be a challenge due to the pandemic. My children are still struggling to adjust to constant pivots. They have been quarantined, vaccinated, been sick several times this fall, and continue to struggle with constantly having to adapt to change. I believe assessments of our children with the current atmosphere would not accurately depict where they truly are academically or emotionally. Furthermore, using these results to "grade" a teacher's, school's, or district's performance with the lasting effects of this pandemic is morally wrong.
937	12/14/21 11:21:34	Teacher	Strongly Support	Students came back this year with a huge deficit and teachers are helping bridge the gap since before the pandemic. A lot of our students are reading at a grade level that is far below the citywide norm.
938	12/14/21 11:24:09	Teacher	Strongly Support	A rubric is inappropriate to measure an educator's capability and skills. There are multiple NEW responsibilities and adjustments that we have made to our teaching for the 3rd consecutive year.
939	12/14/21 11:26:33	Teacher	Strongly Support	I think that certification requirements etc. should be waved because of Covid.
940	12/14/21 11:27:30	Teacher	Strongly Support	I am strongly in favor of NYSED's proposed waiver request. Using an assessment data from the 2020-2021 school year would not provide reliable data. Student learning was inconsistent and varied widely from situation to situation. If I may, I'd like to provide an example based on my teaching assignment last year. My district provided an option for K-6 families to attend school full-time in-person or full-time remotely from home. I was one of two remote teachers for all grade 5 students in our district. We use a departmental model so I taught math and science to all grade 5 remote students. To say it was challenging to provide academic and emotional support would be a gross understatement. Teachers in these situations are limited in what they can do as success requires the support of the parents and guardians at home. Despite more parent outreach than I've ever done previously, many parents were not equipped to support their children learning online full-time. Students who had that support did well and made progress all around, however, this was not the majority. Many kept their cameras off, did little to no work, had a high rate of absenteeism and latenesses. There was not enough staff to provide AIS services to the students who attended the remote school. I kept in close contact with the staff teaching the in-person model and again, there was a lack of support from guardians. The message that staff received from administration and government departments was to emphasize/ focus on the social-emotional well-being over academics. I am now fully back to teaching 5th grade in-person this year. It is clear that across the board, students have a weakened foundation across all subject areas and we are doing all we can as teachers to close these gaps while providing continued social-emotional support. Data must be based on our new normal, not on pre-Covid norms. I could go on and on, but hope I have made my point. I fully support the NYSED proposed waiver request.
941	12/14/21 11:35:10	Teacher	Strongly Support	The challenges from many students losing nearly a year and a half of school cannot be recuperated in just a year. We're seeing students who have forgotten how to be students, how to take notes, and read anything more than a few sentences. This year should be considered a transition year, to allow them to adjust to being students again.
942	12/14/21 11:35:29	Union Leader/Representative	Strongly Support	Do not make judgments our schools based on incomplete test data.
943	12/14/21 11:35:34	Parent	Support	I think now our schools need more than ever any support they can obtain. Without this waiver, they will not be eligible for the grant supports and any other supports they can benefit from.
944	12/14/21 11:38:24	Teacher	Strongly Oppose	We are a small school and have been able to meet in person with ALL of our students for the majority of last school year. We have the data to be able to judged fairly on our improvement and support.
945	12/14/21 11:40:20	Teacher	Support	Now that children are back in school, we are working hard and tirelessly to close the pandemic gaps that were widened during the remote school year of 20/21 school year. Give us that time to do what we do and help close these gaps before you make us responsible for scores. Right now, it's not about scores. Scores are the least of our concerns. It's about getting these students back, working on closing these pandemic gaps that we're seeing with more students this year than ever before, and working with our hearts and souls with their social and emotional needs that was all caused by the pandemic learning students were forced to do. We are tired! We are working endlessly and tirelessly! Halt the breaks and let us catch these students up.
946	12/14/21 11:42:42	School Staff	Neither Support nor Oppose	N/A
947	12/14/21 11:45:18	Teacher	Strongly Support	As a classroom teacher, I would strongly support the U.S. Department of Education to allow New York State to not make accountability determinations and school improvement identifications using data from the 2021-22 school year. Millions of students have been heavily impacted by remote learning, especially students who are ESLs or with special education needs. Even for regular students, learning remote was the number 1 challenge they had to deal with. In addition, many students also experienced challenges at home with finances, or loss of loved ones. This is the first year since we have been back, and we need this whole year 2021-22 to assist and help students readjust to the new normal of learning in classrooms with masks on. Students need this one year from 2021- to 22 to adapt, adjust, and also rebuild both emotional and physical inner strengths to get back to learning in the classroom. I believe strongly the US dept should waive NYS from any accountability determination. Instead, what we need is more emotional and physical program supports that provide more staff support, counselors, teachers, extracurricular activities and outreach program to help make sure students of all backgrounds are now able to receive the help they definitely need to adjust their inner strengths so they can learn in this new normal of living in a world with new covid variants, wearing masks, and social distancing inside the classroom. Using any accountability determination would deter and only place more pressure on both students and teachers. This is not what the students and staffs need. We need a whole new set of tools with emotional support and outreach support to help reach out to students and help them adjust.
948	12/14/21 11:45:26	Teacher	Strongly Support	

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949	12/14/21 11:51:45	Teacher	Strongly Support	"Our district and districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. At [REDACTED], we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request."
950	12/14/21 12:06:19	Teacher	Strongly Support	I strongly agree with with measure. Accountability is compromised at no fault of the school districts. Also, during this time, not only should state mandated testing be postponed, but teacher evaluations should also be postponed.
951	12/14/21 12:12:36	Union Leader/Representative	Strongly Support	With the pandemic still ravaging our community and schools, NYS needs to give some relief to educators so they can focus on the emergency that is happening with their students.
952	12/14/21 12:12:38	Teacher	Strongly Support	High-stakes testing has always led teachers to "teach to the test", which restricts teachers' abilities to plan to accommodate for every learner's needs. It has always been exclusive to students who require more time and engagement with content and deprives them of developing more skills. In a typical year, standardized scores have not been helpful. This year, students are suffering more than ever, expressing overwhelm to their teachers just to get through homework on a daily schedule. They will not benefit from enduring the stress that comes with sitting for these tests, which cause students to believe more that they are incapable and creates more potential to shut down and shy away from their studies.
953	12/14/21 12:19:28	Teacher	Strongly Support	This pandemic has made teaching incredibly hard on all levels. In person, remote , hybrid, groupings...this ISN'T normal. When circumstances aren't normal how can we be held accountable, especially if families don't have internet or even devices. Some families didn't pick up paper pencil work. People are dying...
954	12/14/21 12:21:43	Teacher	Strongly Support	It would be unethical for the state to NOT provide a waiver for this year's state test data. While schools are back in session, the SEL needs are higher than ever, and that needs to set a priority over academics. If students are not in the correct mindset and emotionally regulated, they cannot learn. Also, it has been determinantal to a litany of children who are continually getting quarantined due to exposure. This is leading towards students missing close to two weeks of direct instruction at a time. With this happening repeatedly, many students are suffering from not being able to participate in in-person instruction.
955	12/14/21 12:31:13	Teacher	Strongly Support	We must acknowledge the continuing burdens of the ongoing pandemic, especially with regard to the impact of COVID on our most vulnerable and underserved students.
956	12/14/21 12:34:05	Teacher	Strongly Support	NA
957	12/14/21 12:34:25	Teacher	Support	Our students are facing challenges that we would not wish upon them ever. They are definitely behind socially, emotionally, and yes academically. No reason to add unnecessary stress to their already harried lives right now
958	12/14/21 12:40:49	Superintendent	Strongly Support	We continue to balance the academic needs with the increase in Social Emotional needs of all of our students.
959	12/14/21 12:40:58	Teacher	Strongly Support	Having assessments be the judge of how good I did is a horrible measure of determining how well of a job I did. I teach in a very impoverished district, where my students come to daily with many "ACES" that impact their daily learning...it simply doesn't make any sense; there are so many factors that are out of my control!!!
960	12/14/21 12:52:53	School Staff	Strongly Support	Schools are addressing pandemic issues as best they can for the last 2 years. This is a very inappropriate time to use testing data to determine school effectiveness.
961	12/14/21 12:53:07	Teacher	Strongly Support	Even though students are back at school, we are still not "normal". Using testing data, that tests students ability during normal times, to judge us now during abnormal times would be an unfair evaluation.
962	12/14/21 13:05:18	Teacher	Strongly Support	Covid has had a significant impact on the learning loss of our students, as well a financial loss to parents..
963	12/14/21 13:07:44	Teacher	Strongly Support	Please understand the extreme challenges faced by teachers and staff these last 2 years and how COVID has impacted every area of teaching. It would be extremely unfair and morally wrong to hold schools and teachers accountable by state testing at this time. Please make the right decision and approve the waiver request. Thank you.
964	12/14/21 13:10:31	Teacher	Strongly Support	I strongly support this federal waiver request since there were no state tests administered in 2019-20 and only 40% of students took the grade 3-8 exams in 2020-21.
965	12/14/21 13:14:19	Teacher	Strongly Support	Although we are all in the midst of pandemic fatigue, and many are acting as though the pandemic is over, those of us who work with students are acutely aware that it is not over and that our students are still impacted in myriad ways by this long haul. To pretend that we - and they - are ready to just move on and make up for all lost time without honoring the time they need to deal with their losses in the social emotional arena does not do justice to the needs of children.
966	12/14/21 13:17:34	Teacher	Strongly Support	There are issues this school year that are out of our control such as bussing issues and COVID related quarantines that have negatively affected our attendance and academics. Also, students' socio emotional health has suffered from being home during this pandemic. Schools should be focusing on helping students reacclimate into the school environment rather than worry about test scores. Plus, there has been a gap in their learning due to the pandemic and remote learning which needs to be bridged before moving on.
967	12/14/21 13:21:49	Teacher	Strongly Support	The students are so far behind academically due to remote. Many read and write at the grade levels we started remote.
968	12/14/21 13:31:42	School Staff	Strongly Support	Students, faculty and school staff are struggling under the weight of state expectations during a global pandemic. Mental health of everyone is in jeopardy and we do not need the additional burden of state testing to add to the stress.
969	12/14/21 13:33:51	School Staff	Strongly Support	I strongly believe due to the COVID-19 Pandemic all data will be skewed for these school years. In addition, a Global Pandemic is a level five crisis that we are all currently trying to maintain and sustain a functioning healthy lifestyle in which is not ideal. We are all in survival mode which again would skew any data during this time period.

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970	12/14/21 13:38:42	Teacher	Neither Support nor Oppose	I feel the accountability waiver request should be honored because this is not a typical teaching year. There is a great deal of pandemic factors that impact our teaching negatively and they have to be considered. I am a big proponent of masks and cannot do my teaching without it, but masks can and are: -inhibiting elementary students from fully expressing themselves -make it very difficult to understand some students -require mask breaks that are timely but necessary . . . and many more! This is just masks, I cannot even begin to tell you about social distancing or pivoting to remote teaching for students who have to go to quarantine. This is not a typical year of teaching!
971	12/14/21 13:41:50	Teacher	Strongly Support	The 2021-22 school year has greatly been impacted by the pandemic and the disrupted learning environment. It is not to anyone's benefit to utilize data collected during this time as the pandemic continues to impact students health, well being, and education.
972	12/14/21 13:44:04	Teacher	Strongly Support	Allow students to get back to being educated, this involves connecting with teachers, peers, curriculum, experiences, physical spaces and learning in groups. Allow this to happen so that learning is the priority, then we can get back to state evaluations based on test scores.
973	12/14/21 13:49:03	Teacher	Strongly Support	The year so far has been difficult for students and staff to work through.
974	12/14/21 13:53:54	Principal	Strongly Support	At this point in time, I think we all recognize that students are behind in their learning. School staff and leaders have been working tirelessly to help bridge the gaps with our students for almost two years. The accountability piece is simply setting up schools to lose more teachers who do not want to be considered inadequate based on factors that have been out of their control for the past 18 months. I think it is incredibly important to take the next couple of years to gather data to support schools in making appropriate decisions for student and teacher success. We are at a very precarious moment in education and if we keep placing undue pressure on our teachers at a time when their mental state is already fragile for many we will continue to see a teacher shortage that will only grow over the next few years. Now is the time to build each other up and to support each other for the success of all. The accountability standards that were placed upon us prior to COVID do not support a positive atmosphere nor does it make teachers perform better.
975	12/14/21 13:56:24	Teacher	Strongly Support	We as teachers, students, parents, administrators, etc are very much still feeling and working through the effects of the ONGOING COVID 19 pandemic. All of the parties involved are experiencing and suffering from isolation, loss of routine, grief, financial troubles, and a whole host of other issues and traumas as a result of the pandemic shut downs. It would be grossly negligent on the part of politicians to link any support of students to testing performance in these recovery years.
976	12/14/21 14:03:58	Teacher	Strongly Support	In many ways, this year is even more difficult than last year. The kids aren't depressed like they were last year but they are acting out and not comfortable with doing a "normal" workload. Besides the fact that they are already behind by at least a year, they are not showing the maturity and growth that would have occurred if we hadn't experienced the pandemic. This means that they are not only behind, but not capable of catching up or pushing forward. This year is like the past year and a half in education where we're all shooting for moving targets and the targets aren't moving in synch. Administrators, teachers, students, districts in general are all dealing with the fallout from the pandemic as best they can and no one has a blueprint as to how to move forward from this since it's unprecedented. Districts need leeway to work out what is best for them and their students - not be beholden to any federal expectations. This will hold true for a couple of years, there is no quick fix nor one that can be applied to everyone at this point in time.
977	12/14/21 14:07:17	Teacher	Strongly Support	I do not believe it is equitable to use data from the 2021-2022 school year to make accountability determinations and school improvement identifications. Schools have not had control over student learning for the past year and a half. Students and their families have determined and demonstrated their own value and level of commitment to education. The accountability measure acts as punishment instead of simply identifying schools who have a need for more resources and deserve additional funding. Schools should not be punished for a societal problem in which students and parents do not value or take education serious. The data collected from the current school year would not be used or interpreted correctly.
978	12/14/21 14:14:52	Teacher	Strongly Support	My students are at least 3 grade levels below their actual grade level (6th grade) due to COVID remote instruction.
979	12/14/21 14:20:44	Teacher	Strongly Support	Students are still being quarantined and missing key parts of their instruction. Teachers are still working harder than ever to help their students learn regardless of the regents exams "counting"
980	12/14/21 14:22:51	Teacher	Strongly Support	New York should not use testing data to label or penalize schools.
981	12/14/21 14:30:56	Union Leader/Representative	Strongly Support	Due to Covid, many students are struggling to obtain grade level. Teachers and students alike are putting in maximum effort in order to fill the learning gap. Using the data from the 21/22 school year would have a negative impact on many schools throughout our District.
982	12/14/21 14:33:33	Teacher	Strongly Support	We are still recovering from the pandemic.
983	12/14/21 14:36:08	Teacher	Support	na
984	12/14/21 14:36:35	School Staff	Strongly Support	n/a
985	12/14/21 14:52:59	Teacher	Strongly Support	This year, as much as we hoped that education and learning would be back on track, it is unfortunately not. We are all experiencing students with learning gaps, students who miss extended periods of class time due to quarantining and students who struggle to catch up and handle the responsibilities of a typical school year.
986	12/14/21 14:56:48	Teacher	Strongly Support	We are in the middle of a pandemic and still trying to bring students up to an acceptable academic level. Many children in my school have been quarantined and missed school, some more than once. We need to get through the pandemic and have a grace period so we can focus on the needs of our students. Thank you.
987	12/14/21 14:59:04	Teacher	Strongly Support	Our district and districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. At [REDACTED], we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request.
988	12/14/21 15:03:46	Teacher	Strongly Support	While standardized tests are informative, at this point, students need more SEL than high stakes testing due to loss of loved ones such as parents, restrictions, and economic hardships,.... I believe that the tests should be waived one more year as lives begin to normalize.

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989	12/14/21 15:10:41	Union Leader/Representative	Strongly Support	Please, request the waiver. Enough hurt has been done to our students and teachers.
990	12/14/21 15:21:33	Teacher	Strongly Support	<p>I am a 6th grade english teacher at a school that is comprised of students from socioeconomically challenged families. The majority of families are single income/single parent homes. 100% of the students in my district get free breakfast and lunch. The majority of our students are reading below grade level and as a result writing is a great challenge.</p> <p>My 6th grade students have not had a "normal" school year since they were in 3rd grade. Many students were not pushed to work by families who were overwhelmed with the task of making sure their children logged into a meeting or submitted assignments. Many students/families checked out.</p> <p>Using a test to hold schools accountable to education standards at this time would be cruel. Teachers are working so hard right now to get kids back to a sense of structure and expectations for learning in a classroom.</p>
991	12/14/21 15:23:32	Teacher	Strongly Support	I support this federal waiver request since there were no state tests administered in 2019-20 and only 40% of students took the grade 3-8 exams in 2020-21. The students need time to adjust and recover from the ill effects of the pandemic. Give them time!
992	12/14/21 15:35:47	Teacher	Oppose	Teachers should still be accountable because students still need to learn.
993	12/14/21 15:55:51	Teacher	Support	The federal government, as well as state and local, should be applying to us for a waiver of accountability! Think about it.,
994	12/14/21 15:57:35	Teacher	Strongly Support	This is far from a typical school year.
995	12/14/21 16:02:08	Teacher	Strongly Support	It is a pandemic which continues to disrupt education.
996	12/14/21 16:30:11	Teacher	Strongly Support	The students, faculty, staff, and community in our area, and no doubt throughout the state, are exhausted and stressed beyond limits. We are doing the best we can to provide the most effective and attentive learning experiences possible for our students, but we cannot as a district, community, state, or country continue to act as if business as usual is the right path for anyone. The pandemic has exposed inequities that have had and continue to have significant impacts on student learning opportunities and outcomes. Those inequities (food insecurities, internet accessibility, families' abilities to support learning at home, etc.) must take precedence.
997	12/14/21 16:35:00	Teacher	Strongly Support	Students are legitimately at least one and half years removed from sustained, sequential instruction. The school district has had to deal with an unprecedented situation of a global pandemic that had students at home and then in multiple modalities of instruction that are not anywhere near the structure, format and consistency that came before the nationwide shut down. Students are still acclimating to "pre-Covid" school structures and the discipline it takes to concentrate on school as a priority. They have, literally, forgotten how to learn and behave to ensure learning occurs.
998	12/14/21 17:00:53	Teacher	Strongly Support	Our students were in hybrid mode and rotated on an every third day last school year. Our students also suffered as a result of the digital divide and lack of access to a device for remote learning. Teacher rosters also average 40+ students. Learning loss does not even begin to describe the academic consequences our students have face. It's like trying to tread water in an undertow.
999	12/14/21 17:09:07	Teacher	Strongly Support	
1000	12/14/21 17:10:54	District Personnel	Strongly Support	District and School Accountability has ever been evolving under different legislation. The measures of accountability and school improvement efforts have continued to improve over the years. However, never in the history of the globe have humans experienced a pandemic that has impacted the field of education quite like this. To administer State Assessments, to calculate achievement, growth, and progress scores, to collect chronic absenteeism data as well as CCCR data is absurd considering the current picture of our schools. Administrators, teachers, students, parents, families, and caregivers have all experienced trauma in the last 20 months. This pandemic did not discriminate, all people have been impacted and continue to be impacted. The social emotional needs of all is at a heightened level. It is absurd to believe that student performance will be fairly represented on any assessment. Students didn't 'lose' learning, they never had a chance to receive traditional instruction and to develop their learning to begin with. 3rd graders are 1st graders, 9th graders are 7th graders, socially, emotionally, and cognitively. Educator and student attendance is anything but conventional. It is not 'post-pandemic.' We are very much still experiencing the pandemic. People in every community in our country are dying. These are fathers, mothers, siblings, grandparents, neighbors, of our students. The trauma is insurmountable for so many. It is completely foolish to use any student assessment data this school year to determine district and school accountability. We are talking about life and death, grief and trauma, experiences that will have an impact on all of us for the rest of our lives. We need to think rationally and think about humanity. Using student test scores, attendance, college, career, and civic readiness data to measure district and school accountability should not be up for debate. This is a rather simple decision. It is unequivocally in the best interest of ALL to refrain from using 2021-2022 state assessment data for accountability designations.
1001	12/14/21 17:22:57	Parent	Strongly Support	Students are not prepared to take these tests. These tests are not developmentally age appropriate for children anyway and need to be improved.
1002	12/14/21 17:30:39	Teacher	Strongly Support	Let us teach and heal. Students as well as teachers. Enough is enough.
1003	12/14/21 17:41:03	Teacher	Strongly Support	<p>High-stakes assessments are not sufficient nor appropriate when students and families are still experiencing the effects of COVID-19 and its variants. What will the exams assess when students throughout the state are experiencing academic interruptions and learning social-emotional skills.</p> <p>High-stakes exams are adding more pressure and anxiety in students, especially students who were struggling during the pandemic.</p>
1004	12/14/21 17:44:55	Union Leader/Representative	Strongly Support	It is common sense - the Covid years are unprecedented for students and teachers.
1005	12/14/21 17:45:16	Teacher	Strongly Support	Common Sense--
1006	12/14/21 17:49:29	Teacher	Strongly Support	There was not complete data for the past two years because of COVID. Using this incomplete or nonexistent data to make accountability decisions is not in the best interests of schools, teachers or students. I strongly support the NYSED proposed waiver request.
1007	12/14/21 17:50:50	Teacher	Strongly Support	<p>We're working our butts off. Kids and teachers are struggling, but we're doing the best that we can. Please don't add insult to injury by requiring "grades" when we're all trying to survive.</p> <p>Note: My students ARE making progress, and I'm thrilled. However, we have a LONG way to go to get our students "up to speed." They'll be okay in the long run, so long as continued pressure isn't put on them to perform tests and get "rated" according to grades. Please, stop the madness. Let kids be kids and let teachers do their jobs! <3</p>
1008	12/14/21 17:52:03	Teacher	Strongly Support	I currently have 10th graders acting like 7th graders; it will take some time to get their socialization skills up to grade level, let alone make up for any lost learning.

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1009	12/14/21 18:02:17	Teacher	Strongly Support	Students have been through so much. These tests should be eliminated this year all together. Kids are trying to adjust.
1010	12/14/21 18:05:31	Teacher	Strongly Support	Given the current school climate, in addition to learning gaps from remote learning that have yet to subside, it does not seem beneficial or appropriate to conduct evaluations based on these high-stakes standardized assessments.
1011	12/14/21 18:12:51	Teacher	Strongly Support	NYSED Please show your support for the students, families, teachers, and schools by imparting grace during these already extremely difficult times. The struggle is real- don't kick us while we are down.
1012	12/14/21 18:13:07	Parent	Neither Support nor Oppose	██████████, what have you done to support teachers and students during this pandemic? What freedoms have you openly supported? I see arbitrary quarantine and vaccination rules being thrown around and you think parents are worried about EVALUATIONS! You are a political puppet to the NYS governor, who has shown zero professionalism. At a time like this, with all the stress families, teachers, parents have on them just surviving you feel it's appropriate to force them to perform biased evaluations and ratings. STOP!
1013	12/14/21 18:16:11	Teacher	Strongly Support	Teachers and students are midway through the third disrupted school year. The state assessments' validity and relevance are highly suspect in the best of times. They do nothing other than reflect what we already know; students and teachers are suffering from the lack of normalcy due to the pandemic.
1014	12/14/21 18:19:20	Parent	Strongly Support	Even under normal circumstances this system is flawed and should not be used in the manner that it is. Currently with students constantly in and out of school due to quarantines and being sick it's definitely not a fair assessment of anyone.
1015	12/14/21 18:21:23	Teacher	Strongly Support	Loss of learning from pandemic will not lead to successfully testing administration
1016	12/14/21 18:23:47	Teacher	Strongly Support	As a teacher (though not speaking on behalf of my district), I strongly support the proposition. Students have been deeply impacted by the pandemic, and while I understand the need to assess that impact, that data cannot accurately represent a "typical student" and the needs of the school/district. It is impossible to control for the pandemic variable, and because it cannot be removed, the enormous asterisk on this data in my mind makes it wholly unfit as a representative of a school.
1017	12/14/21 18:27:51	Teacher	Strongly Support	Covid has greatly impacted education and it has been a much different experience district to district. There has been a great loss of learning that cannot be ignored
1018	12/14/21 18:33:44	Teacher	Strongly Support	Nationwide, our students are already behind. The 2020-2021 school year we taught virtually from September until March. Many of the kids either didn't show up or would log in to our online sessions, then turn off their video and disappear. The knowledge lost is astronomical. I teach 4th grade and many of my kids are on a 1st grade level. We must get back to basics and leave the accountability of the schools, students and teachers off to the side for now. It's going to take quite a few years until our students are back to "normal." We are still in the middle of a pandemic and teaching in areas where Covid positivity rates are high. Now is not the time to let our children down. Now is the time to get our students back on track. They have been hit educationally and mentally since March 2020. Please, if you truly care about our kids, you will do what is best.
1019	12/14/21 18:52:35	Teacher	Strongly Support	This year MANY students are below benchmark coming into the school year. Efforts to add more SEL lessons and going outside for instruction has drastically cut time for teaching ELA and math creating an even bigger gap. Students need more time to catch up and more time JUST reading/writing and doing math concepts.
1020	12/14/21 19:06:08	Parent	Strongly Support	Students nor educators should be penalized for the learning gaps displayed by children and the pandemic effects.
1021	12/14/21 19:09:10	Teacher	Strongly Support	Any data gathered about schools during this historic pandemic should be seen as data about the pandemic, not about the efficacy of a school's programs.
1022	12/14/21 19:09:13	Teacher	Strongly Support	Student assessments during a pandemic would not accurately indicate student growth
1023	12/14/21 19:10:50	Teacher	Strongly Support	The students have been through so much the last 2 years. It is unfair to count test scores when everything has been so chaotic. Everyone is trying their best but there has been no stability for our students and schools.
1024	12/14/21 19:12:50	Teacher	Strongly Support	"Our district and districts across the state have borne the weight of this pandemic since its inception. We drastically altered instructional models and interventions to ensure continuity of instruction; we developed extensive plans to return students to in-person learning; we retrofitted facilities and revised operations to accommodate all the mandates; and the list goes on. Until mandatory quarantines for close contacts with confirmed positive COVID-19 cases are no longer required, New York State should request waivers to the federal accountability standards. Student performance and social-emotional intervention data provide substantial evidence that excluding students from school, whether by mandated school closures or ongoing quarantines, has a significant negative impact on students. At ██████████, we have no problem administering state tests to use the information locally to help our students continuously improve, but until everything is allowed to transition back to normal, I support the waiver request."
1025	12/14/21 19:23:35	Teacher	Strongly Support	It is important for the waiver request to be granted for the 2021-2022 school year.
1026	12/14/21 19:23:52	School Staff	Strongly Support	Students and teachers are coming out of 20 months of very difficult learning environments. Students do not need any more stress or burdens, such as state testing, to make them feel like they are not keeping up.
1027	12/14/21 19:31:27	Teacher	Strongly Support	Students suffered a lot of learning loss during the pandemic.
1028	12/14/21 19:41:59	Parent	Strongly Support	Schools have been tasked with prioritizing students' mental well-being over all else for the past two years. To hold students and schools accountable to high stakes tests while students are still quarantining and are limited in their academic experiences to Covid protocols.
1029	12/14/21 19:49:37	Teacher	Strongly Support	Please allow a waiver this year.
1030	12/14/21 19:50:44	Teacher	Strongly Support	My students have been through serious trauma the past two years. My seventh graders last full year of school was 4th grade. To think this school year is "back to normal" is ridiculous. Let us focus on our students as whole people, rather than reduced to a number that will not be close to a representation of their lives experience and growth this year.
1031	12/14/21 20:16:24	Teacher	Strongly Support	Given the extreme circumstances for students, teachers, and schools as a result of the pandemic, the efficacy of state tests is irrevocably jeopardized and should not be used this year.
1032	12/14/21 20:20:52	Teacher	Strongly Support	Students education has been changed over the last year in a half due to COVID and remote learning. Holding schools accountable for learning loss is not a great idea.
1033	12/14/21 20:28:59	Teacher	Strongly Support	In light of missed instruction, death and the uncertainty of the pandemic, I think it's crazy to hold these test to determine a teacher's rating.
1034	12/14/21 20:30:05	Teacher	Strongly Support	It is the right thing to do for our students. This is already an overwhelming year for them and adding more to their plate is not equitable.
1035	12/14/21 20:31:42	Teacher	Strongly Support	Please don't make our kiddos suffer. There is so much trauma already in the 2021-22 school year.
1036	12/14/21 20:40:45	Teacher	Strongly Support	Please consider this waiver that so many of us believe will help our students, faculty and staff. EVERYONE has been impacted in so many ways, last year, and this year, and it is heart breaking to see the ramifications from this pandemic. The pressure on students and faculty can be felt and seen on a daily basis. Please consider this waiver to protect the mental health of so many of our students, family, and faculty members across New York State. Thank you!
1037	12/14/21 20:43:30	Teacher	Support	Almost my entire class has had to quarantine this year and with the previous gaps my students are not at grade level. The anxiety they feel is extremely high already.

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1038	12/14/21 20:47:50	Teacher	Strongly Support	Please consider this waiver as I still have students and classes going in and out of quarantine, thus limiting their learning time in the classroom. I also have after-school tutoring for my students, but it is currently online and not in-person, i.e. less effective.
1039	12/14/21 20:52:43	Parent	Strongly Support	If we aren't "counting the data," then let's get rid of the ridiculous tests while we're at it. These kids don't need to waste a minute on these overpriced assessments that are a complete waste of our children's time and taxpayer dollars. They haven't been an appropriate measure of student success for YEARS, and they are even more inappropriate after what these kids and teachers have dealt with for the last 2 years!
1040	12/14/21 21:06:14	Teacher	Strongly Support	If our focus is to heal these students through SEL, whom for the most part had almost 14 months of interrupted formal education, then state testing should not be used as a tool to measure and hold any professional learning community accountable
1041	12/14/21 21:07:02	Teacher	Strongly Support	This is not the appropriate time to subject families, teachers, administrators, supervisors and especially students to this type of scrutiny. We work hard every day to get the best work out of and learning opportunities in front of our students, but that does not mean they are ready to perform at their highest levels. They are still learning... but learning how to navigate in these uncertain times is a full time job.
1042	12/14/21 21:07:52	Teacher	Strongly Support	After living and teaching through this pandemic, it is clear that our students have been greatly affected socially and emotionally. This heavily impacts their ability to learn anything being taught. As a teacher, I can't teach students who aren't mentally ready to learn. Emotional and mental health needs have to be taken care of first. I strongly feel we as educational institutions need a year of grace to help support our students to get back on a learning path. The pandemic has derailed our system and time will allow all areas to level out the playing field. It shouldn't matter where kids come from in terms of economic status. Yet, schools in poverty zones were hit probably the hardest. Please consider holding off on rankings while teachers continue to build up the emotional well being of kids while supporting their academic needs.
1043	12/14/21 21:19:36	School Staff	Strongly Support	Our students have been through enough with CoVid and all the restrictions that they had no choice but to face over the last two years. They are struggling, and falling behind academically all because not only the time they missed between March to June of 2020 but there are many students who had never been in school from March of 2020 to September of 2021. They had no choice but to fall behind and struggle with the current curriculum that they are being taught. There needs to be alternatives and empathy within our educational system so that our students can get their needs met without having to worry about being tested at where they are supposed to be at. Please take this into consideration!
1044	12/14/21 21:19:41	Union Leader/Representative	Strongly Support	The [REDACTED] strongly supports NYSED's Federal Accountability Waiver Request for the 2021-22 School Year. There are so many things that are beyond anyone's control right now. The idea of holding anyone anywhere accountable despite the mandatory quarantines, family illness, struggles, and uncertainties shows a lack of compassion and understanding. Any data collected under these circumstances will be unreliable and invalid and show a lack of compassion for the human condition.
1045	12/14/21 21:22:38	Principal	Strongly Support	The wavier will allow for greater equity amongst districts, schools and communities. It will be an opportunity for schools to rebuild without the pressure to engage in forms of compliance that do not benefit students.
1046	12/14/21 21:41:00	School Staff	Neither Support nor Oppose	How about giving information in a timely fashion
1047	12/14/21 21:41:51	School Administrator	Strongly Support	We are still in a pandemic. People are still dying everyday. The tests can be administered but many of the students across NYC and NY State have been severely traumatized by Covid19. A waiver is warranted at this time due to ongoing economic and social emotional factors that have impacted the students.
1048	12/14/21 21:43:05	Teacher	Support	Schools should never be ranked as we are adding more stress to these kids.
1049	12/14/21 21:48:05	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further **and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1050	12/14/21 21:49:36	Teacher	Strongly Support	Students have been through a traumatic experience. They need time, not pressure
1051	12/14/21 21:51:36	Teacher	Strongly Support	After a year of remote/ hybrid learning schools/ teachers/students are trying to put out metaphorical infernos with nothing but watering cans. Everyone needs time to regroup and recover from such huge educational disruptions that were completely out of their control. Everyone in the school systems have been working harder than they've ever worked before to maintain access to education for all students during unprecedented times while also supporting students and families through times of personal crises. School staff have never stopped working since the pandemic began and should not face consequences for situations beyond anyone's control.
1052	12/14/21 22:00:04	Parent	Strongly Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further **and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1053	12/14/21 22:01:53	Teacher	Strongly Support	Pandemic.

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1054	12/14/21 22:06:48	Teacher	Support	<p>I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further **and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.</p> <p>To understand my reasoning for the above, please read this statement from [REDACTED]</p>
1055	12/14/21 22:16:57	Parent	Support	<p>I support NYSED's request to be waived from certain ESSA obligations for spring 2022. However, the state's draft waiver request should go further and also ask for (1) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (2) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), and (3) elimination of the 95% state test participation rule.</p>
1056	12/14/21 22:18:29	Teacher	Strongly Support	Please don't penalize schools and waive the data.
1057	12/14/21 22:29:27	School Staff	Support	<p>I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further **and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.</p> <p>To understand my reasoning for the above, please read this statement from [REDACTED]</p> <p>Yours, [REDACTED]</p>
1058	12/14/21 22:33:01	Parent	Strongly Support	<p>I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further **and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.</p>
1059	12/14/21 22:41:22	Parent	Support	<p>I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further **and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. Thank you.</p>
1060	12/14/21 22:44:44	Parent	Support	<p>I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further **and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.</p> <p>To understand my reasoning for the above, please read this statement from [REDACTED]</p>
[REDACTED]	12/14/21 22:51:39	Teacher	Strongly Support	It's about kids stop waiting tax dollars trying to screw teachers
1062	12/14/21 22:54:21	Teacher	Strongly Support	In another school year disrupted by the pandemic, I strongly supports SED's request for a federal waiver from state accountability requirements for 2021-22.
1063	12/14/21 23:10:22	Parent	Support	<p>NYSED must be allowed a waiver from ESSA obligations for spring 2022 AND any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT.)</p> <p>Schools wishing to exit from accountability designations (such as TSI, CSI) must be offered a reasonable and effective way to do so, and the 95% state test participation rule must be eliminated!</p>
1064	12/14/21 23:11:11	Teacher	Strongly Support	Students did not have a great opportunity to learn in a collaborative, supportive and multifaceted way. They were separate, difficult to hear with masks on and did not have their carpeted area for building communication and community. Please reconsider the use of test scores to penalize schools that worked hard to keep kids and families safe throughout the school year.
1065	12/15/21 0:33:45	Teacher	Support	<p>I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further **and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.</p> <p>To understand my reasoning for the above, please read this statement from [REDACTED]</p>
1066	12/15/21 1:00:10	Parent	Strongly Oppose	Meet the criteria or try again. Don't change the standard.

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1067	12/15/21 5:32:27	School Staff	Strongly Support	I am a first grade teacher. My students are making progress this year and I am very proud of their efforts but they are below the normal expectations, especially in ELA skills.
1068	12/15/21 5:37:15	Teacher	Strongly Support	I strongly support this federal waiver request since there were no state tests administered in 2019-20 and only 40% of students took the grade 3-8 exams in 2020-21.
1069	12/15/21 5:39:57	Teacher	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1070	12/15/21 5:45:29	Parent	Support	Kids have not had adequate time to catch up
1071	12/15/21 5:51:51	Teacher	Strongly Support	The challengers schools are facing have increased exponentially since the onset of this Covid-19 worldwide pandemic. While we are attempting to provide a "regular" school year to our students, this year is far from normal. The level of social emotional need often outweighs the school's ability to achieve the accelerated growth needed to address the learning progress towards grade level standards that was slowed due to the shutdown of the school systems in March of 2020 and the continued struggle to provide consistent in person instruction for the majority of the 2020-2021 school year for many students. As an employee of [REDACTED], I have am immersed in a educational community that has been struggling to successfully meet the social emotional and academic needs of students for many years. This pandemic has only exacerbated this struggle. [REDACTED] staff have been working tirelessly, employing innovative ideas and resources, to meet these needs of the community we serve. To push for high stakes tests, when students are in the midst of trying to cope and find normalcy again in their personal lives and education, would be irresponsible. Once this pandemic can officially be declared over, schools can truly return to a "normal" operating structure, and teachers can ethically shift their efforts to a more balanced approach between supporting the social emotional needs and academic needs of students, then a return to utilizing high stakes tests as an accountability measure for schools should be revisited.
1072	12/15/21 5:55:57	Teacher	Strongly Support	It's time to put students mental health before academics. This is more important during a pandemic. Teachers and students are working hard to lessen the academic gaps. Until mandatory quarantines and Covid is over, we need to put students well-being first. The one positive of this pandemic is recognition what is most important during these times. Students shouldn't be crying during assessments due to the stress the pandemic has caused but it's happening. Social and emotional health needs to be priority number one. Our hard work should not be defined by a test number during these tough times. Put the kids first!!!
1073	12/15/21 6:14:11	Teacher	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1074	12/15/21 6:15:39	Parent	Support	I support the waiver request, but also believe that the waiver should go further. We need schools to have an off-ramp from this testing system and elimination of 95% test participation requirement.
1075	12/15/21 6:15:57	Teacher	Support	Please do not add high stakes standardized tests to an already overwhelming school year. Our students are traumatized already, and we cannot pretend that this pandemic is over and we should be back to normal.
1076	12/15/21 6:20:11	Parent	Strongly Support	These tests are pointless in a regular year, under regular circumstances. After what these students have been through over the last 2 years, these tests are now both pointless and unnecessary. Let's let the students get back into the flow of in-school learning and let them get caught up a bit.
1077	12/15/21 6:27:13	Parent	Strongly Support	I support the waiver, but believe it could go further. This year in particular, and probably for the next few due to Covid, no school nor student should be distracted nor penalized on the basis of test scores. Student, teachers, parents are all suffering the effects of the pandemic and we need to help them, not withhold funding and services based on tests proven to show bias against bipoc and economically disadvantaged students.
1078	12/15/21 6:40:49	Teacher	Strongly Support	I'm a parent and a teacher. I've taught in NYC since 2004 and I've seen test score data used in such harmful ways. My first school was closed when the [REDACTED] deemed it a failure based on test score data. The entire school community was traumatized. The school didn't need to be closed, we needed support and funding. Test score data has been wrongly used to judge students, teachers and schools for years. If ever there was a time for a waiver, it is now. Our students, teachers and school communities have been through so much. They don't need to be evaluated or judges. They need to be supported.
1079	12/15/21 6:48:17	Community Based Organization Leader/Representative	Support	I support NYSED's waiver request for some ESSA requirements. The NYSED spring tests have been allowed to hijack real learning, with daily work being limited and even defined by attempts to mimic the NYSED tests. If a school tried to comply with the state's limit on a percentage of time spent on test prep they might say they are doing very little--but in fact in most schools test prep has become instruction, all day, every day. If all stakes were removed and one simply sought work samples we might get some genuine help from asking students to work on a common task once a year. But as things stand now, the tests get in the way of precisely what they claim to promote. Perhaps the cruelest irony is that students who need help, and in some cases individual help, are ignored in the quest for good scores. As one principal directed me: "Concentrate on the high two's and forget about the one's." While supporting the request for a waiver, I think you should ask for more. as my fellow-members of NYC Opt Out have articulated: (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. Please read this statement from [REDACTED] Thank you for submitting the waiver and requesting public comment. Let's hope this is granted!

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1080	12/15/21 6:59:05	Parent	Support	<p>I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further **and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.</p> <p>To understand my reasoning for the above, please read this statement from [REDACTED]</p>
[REDACTED]	[REDACTED] 21 7:05:16	Teacher	Strongly Support	I believe it's in the best interest of all involved to grant the waiver request since there were no state tests administered in 2019-20 and only 40% of students took the grade 3-8 exams in 2020-21.
1082	12/15/21 7:18:31	Parent	Strongly Support	[REDACTED] students have had very disparate and inequitable access to their education throughout the pandemic. Holding schools to rigid performance metrics will disproportionately negatively impact our most marginalized communities, with the consequences of cookie cutter education reforms imposed on communities where what is needed are mental health care, physical health care, nutrition, and housing supports in conjunction with educational services. Performance metrics in this moment do not advance the cause of education, and do not take into consideration the wholesale trauma this pandemic has caused this current generation of students. In this moment our schools need time to be dynamic and flexible as they seek to help our communities heal and grow.
1083	12/15/21 7:19:54	Parent	Support	<p>I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.</p> <p>To understand my reasoning for the above, please read this statement from [REDACTED]</p>
1084	12/15/21 7:22:36	Parent	Support	<p>I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.</p> <p>To understand my reasoning for the above, please read this statement from [REDACTED]</p>
1085	12/15/21 7:23:03	Parent	Neither Support nor Oppose	<p>I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.</p> <p>To understand my reasoning for the above, please read this statement from [REDACTED]</p> <p>(3) Among the questions you are asked to fill out (though name etc are not required) is #5: To what degree do you support NYSED's proposed waiver request? None of the answer choices are really reflective of our position, but we advise marking "Support" as the best compromise.</p> <p>Yours truly [REDACTED] (parent)</p>
1086	12/15/21 7:25:56	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1087	12/15/21 7:34:44	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1088	12/15/21 7:35:17	Teacher	Support	<p>I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.</p> <p>To understand my reasoning for the above, please read this statement from [REDACTED]</p>
1089	12/15/21 7:37:58	Parent	Strongly Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.

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1090	12/15/21 7:44:02	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1091	12/15/21 7:46:10	Teacher	Strongly Support	My special education students are still adjusting to being back in the building. They don't need the stress of testing too
1092	12/15/21 7:50:14	School Administrator	Strongly Support	I believe the NYS process is for the Department of Education to lead the state in education. I support the decision of the experts in education
1093	12/15/21 7:52:28	Teacher	Support	Na
1094	12/15/21 7:53:06	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from NYC Opt Out: https://www.optoutnyc.com/statement-in-response-to-nyseds-testing-waiver-proposal
1095	12/15/21 7:53:08	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from NYC Opt Out: https://www.optoutnyc.com/statement-in-response-to-nyseds-testing-waiver-proposal
1096	12/15/21 7:58:31	Teacher	Strongly Support	With students attending school less days in the school year of 2020-21 they lost out on much content and skills. Many students did not have the proper learning environment at home to be able to complete assignments and learn when not in school. We should not be looking at that data to make any decisions.
1097	12/15/21 7:58:51	Teacher	Strongly Support	As a public school teacher of Grade 5 students, I ask you to consider that students are currently struggling to stay healthy during the COVID pandemic. This challenging time in education has caused countless student absences, alteration of daily activities and movement, as well as postponement of many afterschool programs meant to help students be successful. Unfortunately, this is not a normal school year, and expectations should be adjusted to meet our new reality.
1098	12/15/21 7:58:55	Teacher	Strongly Support	This has been another year of adjustment and exhaustion on the part of staff students and families. We are still operating in a pandemic situation with all of its challenges
1099	12/15/21 8:00:55	Teacher	Strongly Support	I believe that the students need more time to readjust to in person learning, and fill gaps that were created. Using this year's data would NOT give an accurate look.
1100	12/15/21 8:02:19	Teacher	Strongly Support	We still have many students who are remote who are learning at a different pace than those in school. Also, those students who are in school in person are FAR behind in not only academic skills but social and behavioral skills which highly impacts their ability to perform on tests and assessments.
1101	12/15/21 8:02:48	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from NYC Opt Out: https://www.optoutnyc.com/statement-in-response-to-nyseds-testing-waiver-proposal
1102	12/15/21 8:04:03	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1103	12/15/21 8:05:58	Teacher	Strongly Support	Many of my students have been on multiple quarantines, and have missed many weeks of school.
1104	12/15/21 8:10:29	Parent	Strongly Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1105	12/15/21 8:11:23	Teacher	Strongly Support	Simply put, the 2021-2022 school year is a "recovery" year at best, a tumultuous one at worst. Teachers are attempting to gain what was lost last school year, teach this school year's curriculum, and attend to the social emotional toll of the pandemic.
1106	12/15/21 8:13:37	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1107	12/15/21 8:13:50	Teacher	Strongly Support	Teacher and student mental health and wellness should come first. We can pretend that this is a "normal" school year all we want but that is clearly not true. We have student mental health crises, teacher burnout, and staff shortages at alarming rates. The last thing any student or teacher needs to be worried about is test scores. We need to make sure teachers are healthy enough to teach and that students are in a place to learn. Until those two parameters are met, test scores will be meaningless.
1108	12/15/21 8:17:10	Teacher	Strongly Support	The data you gather for this year cannot possibly provide an accurate basis for any comparisons made between schools or with prior years.

#	Date of Submission	Stakeholder Group	Degree of Support for Waiver	Provided Comment (Note: Items have been redacted to ensure privacy of stakeholders)
1109	12/15/21 8:19:24	Parent	Strongly Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1110	12/15/21 8:19:28	Teacher	Strongly Support	State accountability requirements for 2021-2022 should be waived due to the impact of Covid 19 on our communities in general, and on our students in particular. All stake holders need time to recover from the learning loss due to the world wide pandemic and as such should not be subject to federal scrutiny and or punitive measures based on federal guidelines.
1111	12/15/21 8:19:54	Parent	Support	Solo estoy apoyando a la escuela.
1112	12/15/21 8:26:01	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. That being said, I believe the state's draft waiver request should go further and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1113	12/15/21 8:30:06	School Administrator	Support	With so many students in constant transition between home and school because of Covid 19 and different community rates of infection causing so many fluctuations in attendance, the data can not be compared from one school to the next in order to make good decisions. The data may be useful for the individual school only, to see how much they are in need of services, as in most cases school have declined in educational bench marks compared to pre Covid data.
1114	12/15/21 8:36:57	Community Based Organization Leader/Representative	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1115	12/15/21 8:42:13	Teacher	Strongly Support	Having this waiver will be important due to the fact that we had an extended circumstance that affected how operations in education have run. It will support everyone in the state, and we will not have to worry about losing funding due to the pandemic.
1116	12/15/21 8:44:26	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1117	12/15/21 8:48:03	Teacher	Strongly Support	The data would be extremely skewed do to issues with covid.
1118	12/15/21 9:04:57	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1119	12/15/21 9:06:06	Teacher	Strongly Support	This year is pretty stressful. We are trying to teach the students how to behave in public, how to focus for more than three minutes again, trying to encourage motivation to engage and persist in a task that none of them want to. Students are having to quarantine on a half making it difficult to effectively teach and get them to make up learning they have missed.
1120	12/15/21 9:11:03	Teacher	Strongly Support	High stakes testing shouldn't be used for anything that could negatively impact a school- whether that be funding or otherwise.
1121	12/15/21 9:15:14	Union Leader/Representative	Strongly Support	Now is not at all the time to apply the same metrics that we have historically used to determine a school or district's accountability. Everyone believed we were through this pandemic and returning to "normal" this school year, yet there has been nothing normal about what is happening in our schools. We need to think differently around how we are defining success and supporting our students and schools. Certainly that should not happen through standardized testing because no aspect of our instructional environment has been standardized. Thank you for your forward thinking on this issue.
1122	12/15/21 9:17:19	Parent	Strongly Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1123	12/15/21 9:18:17	Assistant Superintendent	Strongly Support	Although our school district would like to remove our TSI designation, we recognize that patience is required due to the pandemic caused by COVID-19. It is our hope to provide our students normalcy and not rely on flawed assessment results likely to result from the disruption to their academic careers.
1124	12/15/21 9:19:07	Teacher	Strongly Support	Just wanted to say HI.

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1125	12/15/21 9:20:29	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1126	12/15/21 9:21:32	Parent	Strongly Support	In addition to being a parent of a child who attends school in this district, I am also a physical therapist that attends to the needs of children with developmental delays in this same district. The children who have entered school over the last 2 years have had much lower than average social emotional maturity. Children's performance definitely reflects the lack of socialization and physical activity that they would have gotten before conditions forced our society to be more isolated. These children have required a great deal of support to help them get caught up to the point where children normally enter Kindergarten. Anxiety also seems to be much more common in children than it once was. These issues affect all school aged children, and their readiness to be focused learners. In my opinion, the data collected from the 21-22 school year would not be an accurate representation of our staff's effectiveness, nor our student's true abilities.
1127	12/15/21 9:23:24	Teacher	Strongly Oppose	Students need to be tested for research data purposes, hoping this data will help students educational needs.
1128	12/15/21 9:23:53	Union Leader/Representative	Strongly Support	February 2020 was the last month of "normal" school our students have experienced. Their lives have been in a constant upheaval these past 22 months. Emotionally and academically they are not "on grade level" and shouldn't be expected to be.
1129	12/15/21 9:29:07	Teacher	Strongly Support	Over 2% of students are not able to come to school due to quarantine, at any given time. This number is likely to increase over the winter months. This does include staff or other students' absences. Students and teachers are constantly in and out of the classroom and dealing with additional stress that comes with the pandemic. This will not yield the most accurate data needed to make important decisions to benefit our students. They need mental, emotional, and academic support, more than ever before.
1130	12/15/21 9:29:11	Teacher	Strongly Support	I never think standardized tests are the best way to assess students and definitely not now with students in and out and family traumas etc
1131	12/15/21 9:30:49	Superintendent	Strongly Support	This year has been more difficult than even last year. We're fully in-person this year however our quarantine numbers are four times the amount of last year. We're doing our best to provide alternate instruction for quarantined students.
1132	12/15/21 9:33:15	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1133	12/15/21 9:38:10	Parent	Strongly Oppose	your own: I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1134	12/15/21 9:38:45	School Staff	Strongly Support	Learning remotely doesn't compare to learning in person.
1135	12/15/21 9:40:00	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1136	12/15/21 9:42:16	Assistant Superintendent	Strongly Support	We feel that schools that are currently designated as TSI (as our MS is) should have the option to utilize internal data (or NYS testing data) to be REMOVED from this designation; however, no new schools should not be identified.
1137	12/15/21 9:42:30	Teacher	Strongly Support	I believe it's hard to use data from the first full in person school year schools across the state have had in the last two years. There are so many gaps and problems students are facing the data is skewed.
1138	12/15/21 9:45:45	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1139	12/15/21 9:50:42	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1140	12/15/21 9:51:39	Superintendent	Strongly Support	Given the impact of the pandemic, a complete restart of the accountability system is warranted. This would level the playing field.

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1141	12/15/21 9:52:19	Teacher	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1142	12/15/21 9:55:36	Assistant Superintendent	Strongly Support	Accountability is needed. Number and comparisons matter in helping us identify best practice. However 'old' measures - no matter how valid - do not measure success in the 'new' normal. The true value and effectiveness and schools over the last 20 months cannot be measured in standardized assessments. Not only do I support this waiver but I'd ask for us to look to create a holistic and flexible approach to school effectiveness moving forward. Let's strive to make accountability measures, more formative and summative, and focus more on identifying 'best practice' so it can be duplicated, than on identified weak practice so it can be corrected.
1143	12/15/21 9:55:46	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1144	12/15/21 9:56:53	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1145	12/15/21 9:56:59	Teacher	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1146	12/15/21 10:00:30	Teacher	Strongly Support	I feel our school is doing well making sure students are in school as much as possible but with COVID and quarantines, students are in and out a lot. We have provided asynchronous learning while at home but it is not as good as being in school with our wonderful teachers.
1147	12/15/21 10:04:36	Parent	Strongly Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. However, the state's draft waiver request should go further and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1148	12/15/21 10:07:31	Community Based Organization Leader/Representative	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, I believe the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1149	12/15/21 10:11:04	School Staff	Strongly Support	I support a waiver because the state tests are not valuable measures of children's abilities. Instead, the test are used to separate and segregate children, punish teachers and schools and force schools to spend time and energy on prepping instead of creative curriculum. The tests disproportionately impact children of color, low income children, ELLs and STH. This is the third year we are impacted by COVID. This is the third year we should have a waiver on the tests, and hopefully we'll never go back to them!
1150	12/15/21 10:25:26	School Staff	Strongly Support	With students being in and out of the building state test scores being used for accountability should be null. Not only were tests reused from previous years but students also are delayed due to no fault of their own or school staff. Different socioeconomic status levels of districts across the state also had a huge effect on what resources they were able to provide during the pandemic and what resources their families had to get through the pandemic.
1151	12/15/21 10:25:29		Strongly Support	Standardized testing should never be used to evaluate teachers. How students perform on high stakes standardized testing is beyond the control of teachers. Students are independent agents. Furthermore, standardized testing is not a reliable indicator of student growth or learning.
1152	12/15/21 10:26:01	Teacher	Strongly Oppose	It is the middle of a pandemic, attendance has been sketchy because of quarantine. Plus, there are tremendous learning gaps from students not participating in on-line learning last year!
1153	12/15/21 10:26:23	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.

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1154	12/15/21 10:36:55	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further **and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1155	12/15/21 10:44:02	Other	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further **and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1156	12/15/21 10:44:54	Teacher	Strongly Support	Thank you for seeking public comment.
1157	12/15/21 10:45:31	Teacher	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further **and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1158	12/15/21 10:49:36	Teacher	Strongly Support	Extenuating circumstances brought about by covid absolutely necessitate this waiver. Doing otherwise is a disservice to students.
1159	12/15/21 10:52:56	Teacher	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further **and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1160	12/15/21 10:55:10	School Staff	Strongly Support	COVID closures have caused a social emotional response as well as mental issues with our students. Online learning did not benefit the majority of students so that significant gaps in education are evident. Taking into consideration these challenges, I believe the state should seek the proposed waiver.
1161	12/15/21 11:01:30	Teacher	Strongly Support	The current social-emotional needs of our students should be the forefront of our concerns.
1162	12/15/21 11:01:49	Teacher	Strongly Support	We are still involved in a pandemic - our students are working hard but very fragile.. any testing is a huge stress on the students and on us as we try to teach curriculum while being mindful of our students' emotional needs. Teachers are well aware of what our students need in order to address learning. Testing, especially state tests , will not help teachers and might be damaging to our student's fragile self esteem.
1163	12/15/21 11:04:27	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further **and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1164	12/15/21 11:05:03	Teacher	Strongly Support	Due to the overwhelming learning gaps that are a result of this pandemic, approval of this waiver is of the utmost urgency! Our students social/emotional well being need to be addressed and acted upon first so that their academic learning can take place! This is also true for all stakeholders who are also doing their best to support our students and families' needs in the best ways possible! Additionally, as a result of this pandemic, I strongly feel that there should be no NYS assessments in grades 3-8 as well as APPR!

#	Date of Submission	Stakeholder Group	Degree of Support for Waiver	Provided Comment (Note: Items have been redacted to ensure privacy of stakeholders)
1165	12/15/21 11:07:04	Parent	Support	<p>Dear Commissioner Rosa, Chancellor Young, and Secretary Cardona, Our grassroots coalition of families and educators, [REDACTED], writes to support New York State Education Department (NYSED) in its request to be waived from certain ESSA obligations for spring 2022. However, the state's draft waiver request falls far short of what it should be asking. The primary and significant shortcoming of this draft is that the state has not asked to be waived from the requirement of having to administer the tests, period. In last year's waiver request the state asked that the US Department of Education (USDE) completely waive the annual grades 3-8 requirement and partially waive the NYSESLAT testing requirement for learners of English as a New Language. (This year's waiver request does not even mention NYSESLAT.) While we applaud the state asking to be relieved from having to identify new CSI and TSI schools based on data from 2021-22, we find it unacceptable that it once again fails to ask USDE for a non-test-score or test-participation based off-ramp for schools who wish to exit the CSI or TSI designation. As one parent put it:</p> <p>My child's school was placed on this [CSI] list because over 75% of the students refused to participate in state testing in 2019, as is their right. The school has been stuck on this list since then because of cancelled state tests in 2020 and essentially no testing in 2021. It is absurd to evaluate schools on these senseless tests. And it is even more absurd to put a highly functional school on one of these lists based on extremely limited testing and then create no path for that school to ever be removed from the list. The burdens placed on our school are immoral and detracting from the important work going on in our classrooms. The charade of Participation Improvement Plans, which essentially force schools to coerce children into participating in testing, needs to be stopped immediately. It is essential that NYSED request a waiver from both identifying new schools to be placed on the TSI or CSI lists and that NYSED immediately release all schools currently trapped in that status. ENOUGH!</p> <p>The case NYSED makes to USDE for being waived from having to identify new schools or districts for accountability labels could just as easily be made for why it should be asking to be waived from test administration entirely. After all, we remain in pandemic, with classrooms or whole schools closing temporarily and students and staff being periodically quarantined, or worse, falling seriously ill themselves or having family members who are seriously impacted by COVID, whether that manifests economically, or in the direst of instances, in long-term illness or even death. (Just between 9/13/2021 and now, in New York City alone, over 12,000 classrooms have been fully or partially closed. Source: https://www.schools.nyc.gov/school-life/health-and-wellness/covid-information/daily-covid-case-map)</p> <p>Quoting the Center for School and Student Progress, NYSED includes the following in its draft request:</p> <p>As daily life increasingly returns to 'normal,' we must confront what this means in the context of education...next year [2021-22] cannot be a 'normal' year. We cannot return to the classroom and do things the same as they have always been done and expect to see a different outcome. Instead, we must use this critical moment in education to radically rethink how programs, policies, and opportunities are designed and fiercely commit to prioritizing the communities most impacted by the pandemic and distributing resources accordingly. (https://www.nwea.org/content/uploads/2021/07/Learning-during-COVID-19-Reading-and-math-achievement-in-the-2020-2021-</p>
1166	12/15/21 11:08:22	Teacher	Strongly Support	It is high time to abolish these harmful, and unyielding requirements.
1167	12/15/21 11:08:27	Teacher	Strongly Support	Please consider waiving any kind of school/teacher accountability that would ultimately be punitive against teachers, administrators, and school districts. We are still dealing with the coronavirus pandemic impacting our schools. Teachers and students are working hard to make gains from the loss of in-person instruction last school year. We are still facing quarantines, student and teacher absences, and bussing issues, which are impacting daily instructions. Please allow everyone this time to adjust to our new circumstances - living with and teaching with the coronavirus.
1168	12/15/21 11:15:52	Parent	Support	<p>I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.</p> <p>To understand my reasoning for the above, please read this statement from [REDACTED]</p>
1169	12/15/21 11:20:27	Parent	Support	<p>I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.</p> <p>To understand my reasoning for the above, please read this statement from [REDACTED]</p>
1170	12/15/21 11:21:26	Community Based Organization Leader/Representative	Strongly Oppose	Accountability measures are the single greatest method that we have in determining learning levels and school need. Without them, we may grant diplomas to students ill-equipped for either academic or career advancement.
1171	12/15/21 11:22:24	Community Based Organization Leader/Representative	Strongly Oppose	I think that this goes deeper then this. I think that teachers should be educated on the different learning styles to help prep students to be able to take these tests.
1172	12/15/21 11:22:27	Parent	Support	<p>I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.</p> <p>To understand my reasoning for the above, please read this statement from [REDACTED]</p>

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1173	12/15/21 11:22:50	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1174	12/15/21 11:24:30	Other	Strongly Oppose	Struggling schools rely on funding allocated based on performance on the Regents, those assessments should not be waived.
1175	12/15/21 11:25:34	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1176	12/15/21 11:26:46	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1177	12/15/21 11:35:11	Principal	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1178	12/15/21 11:40:23	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1179	12/15/21 11:41:21	Teacher	Strongly Support	Schools cannot be accurately scored based on incomplete data which includes inconsistent educational practices due to a Worldwide Pandemic.
1180	12/15/21 11:46:42	Teacher	Strongly Support	Incomplete data on students.
1181	12/15/21 11:50:37	Teacher	Strongly Support	Everyone is traumatized. Waive the tests
1182	12/15/21 11:57:38	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for Spring 2022. I wish that the waiver request went even further! There should be a waiver from the requirement to administer annual standardized tests (e.g., grades 3-8 math and ela). There should be a pathway to separate test scores from school accountability rubrics. And, the 95% state-test participation rule should be eliminated.
1183	12/15/21 11:58:35	Teacher	Strongly Support	N/A
1184	12/15/21 12:00:11	Teacher	Strongly Support	With the chaos of the last year with regard to COVID, it has dramatically affected schools. Students have missed significant time, whether having COVID themselves or being quarantined due to close contact. Schools have worked incredibly hard to close gaps, but I truly believe it would be extremely unfair to impose accountability determinations based on what they've experienced since COVID shut down many schools beginning in March of 2020. Therefore, I strongly support NYSED's proposed waiver request.
1185	12/15/21 12:01:14	Teacher	Strongly Support	I strongly support this federal waiver request since there were no state tests administered in 2019-20 and only 40% of students took the grade 3-8 exams in 2020-21.
1186	12/15/21 12:01:19	Teacher	Strongly Support	These tests would not even be an accurate display of student achievement due to the inconsistencies of the school climate over the past few years as a result of covid.
1187	12/15/21 12:03:21	Parent	Strongly Support	The Federal Government should not use any of the recent data as it is incomplete, since very few state tests have been administered the last 2 years and when they have been offered a very small percentage of students actually took the exams.
1188	12/15/21 12:06:57	Teacher	Strongly Support	Keep up the fight!
1189	12/15/21 12:08:12	Teacher	Strongly Support	The data that would be used is invalid. During a time when instruction is not rigorous and in-person, how can you expect true results? Data that is accurate? I think not.
1190	12/15/21 12:08:44	Teacher	Strongly Support	Our state testing has been significantly altered over the last few years due to COVID-19 restrictions. To use the data we do have in a way that would affect schools would be unfair and inaccurate.
1191	12/15/21 12:15:11	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]

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1192	12/15/21 12:18:12	Teacher	Strongly Support	Schools should not be penalized for testing scores or lack thereof since the Pandemic began. With the outcry of students being taught remotely it should be well known that valid tests were not performed via zoom, or with absences due to illness. We are held accountable enough working through this (without hazard pay) that not granting a waiver is absurd.
1193	12/15/21 12:19:22	Teacher	Strongly Support	There is no reliable test data to use at this time.
1194	12/15/21 12:21:02	Union Leader/Representative	Strongly Support	This is a common sense waiver request. For schools, teachers, and students continuously assessed when the "normal" school system was unattainable despite everyone's best intentions, This is a great time to end the federal mandate altogether but at the very least, the have thi waiver granted. Thank you.
1195	12/15/21 12:23:50	Parent	Strongly Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1196	12/15/21 12:25:53	Community Based Organization Leader/Representative	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1197	12/15/21 12:32:08	School Staff	Strongly Support	I am the school psychologist at an elementary school; the effect of the pandemic on students mental health and well-being, as well on their academic functioning, cannot be underestimated. Students are expected to be behind right now and it makes sense based on what we have been living through.
1198	12/15/21 12:34:22	School Staff	Strongly Support	[REDACTED]
1199	12/15/21 12:38:21	Other	Strongly Support	Letter sent via email
1200	12/15/21 12:41:03	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1201	12/15/21 12:47:39	Teacher	Strongly Support	Extraordinary year
1202	12/15/21 12:48:23	Teacher	Strongly Support	Our students were part-time last school year and most of my students were remote and did not take the state tests.
1203	12/15/21 12:50:28	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1204	12/15/21 13:00:03	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1205	12/15/21 13:01:48	Parent	Strongly Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1206	12/15/21 13:07:20	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1207	12/15/21 13:07:27	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1208	12/15/21 13:07:35	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.

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1209	12/15/21 13:08:01	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1210	12/15/21 13:10:58	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1211	12/15/21 13:11:27	Assistant Superintendent	Strongly Support	The accountability status of a school district or building has tremendous impact on all those connected to the school or district. It is our job as educators to ensure that these "labels" we put on buildings are accurate. With all that has transpired over the past nearly 2 years and the impact it has had on state assessment data it would be unethical to this data to make any sort of accountability designation and school improvement identifications. We are still very much in this, and recovering as an educational system and so to try to go back to "normal" would be wrong. This is an opportunity to reimagine what this system of accountability looks like and how it truly serves the needs of students. I'd be glad to have continued involvement in this work.
1212	12/15/21 13:11:53	Parent	Strongly Support	I support NYSED's request to be waived from certain ESSA obligations for spring
1213	12/15/21 13:21:46	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022.
1214	12/15/21 13:26:39	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1215	12/15/21 13:27:10	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1216	12/15/21 13:27:44	Student	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1217	12/15/21 13:28:05	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1218	12/15/21 13:31:45	Parent	Strongly Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1219	12/15/21 13:34:14	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1220	12/15/21 13:39:32	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. *However, the state's draft waiver request should go further * and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1221	12/15/21 13:44:24	Parent	Support	I am in support of NYSED's request to be waived from certain ESSA obligations for spring 2022. *However, the state's draft waiver request should go further * and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1222	12/15/21 13:45:51	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022.
1223	12/15/21 13:49:16	Union Leader/Representative	Strongly Oppose	[REDACTED]

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1224	12/15/21 13:51:14	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. Allow schools to assess their students in more meaningful ways, as has always been the practice at the Earth School. This is why families have chosen to send their children to [REDACTED] for the last 25 years.
1225	12/15/21 13:54:19	Other	Strongly Support	Less than half of the student population was tested at the 3-8 level, therefore test results do not represent the entire population. A waiver is needed because data is not sufficient
1226	12/15/21 13:56:41	Teacher	Strongly Support	Aside from real learning loss, there is an emotional need that has slowed progress this school year. We have students in and out quarantining as well. This school year is not reflective of the true academic abilities of our schools.
1227	12/15/21 13:58:11	Parent	Strongly Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. *However, the state's draft waiver request should go further * and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1228	12/15/21 14:04:16	Parent	Strongly Support	Please do not put any more pressure on school administrations, teachers, students, or families this year. The only thing that should matter is the well-being of everyone in the school buildings, particularly students. Please. Thank you.
1229	12/15/21 14:11:04	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. *However, the state's draft waiver request should go further * and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1230	12/15/21 14:12:16	Teacher	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. *However, the state's draft waiver request should go further * and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1231	12/15/21 14:21:15	Teacher	Strongly Support	Many, many students have missed many, many days of school either to COVID quarantine, or sickness COVID-19. Our students have missed many more days of school than last year. We are not only struggling to teach when half of our class is out, but then we are struggling more to get them caught up on the work they have missed. We have an inverted RTI pyramid and the students are greatly struggling.
1232	12/15/21 14:21:45	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. *However, the state's draft waiver request should go further * and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1233	12/15/21 14:24:29	Parent	Support	This request for waiver doesn't go far enough. These contracts for senseless tests are too expensive when we know what works. We don't need another expensive testing contract to tell us that poorer and BIPOC students are too far behind after decades of education disinvestment. COVID has exacerbated this. Smaller class sizes, early intervention and infrastructure to repair ancient school buildings will bring our kids up to speed. Don't tie test scores or opt out percentages to anything except an opportunity to apply for Title I status.
1234	12/15/21 14:33:25	Teacher	Strongly Support	Please consider what these students and schools have gone through the past two years. Students have been out of school more this year than in the past for protocols and quarantines.
1235	12/15/21 14:40:58	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1236	12/15/21 14:43:02	Teacher	Strongly Support	the students missed a partial year of in school education...another year with half day instruction... and no tests were administered in the school year 2019-2020. also it should be noted only 40% of our students took the exams in the 2020-2021 school year. All of these facts should be considered for this waiver request.

#	Date of Submission	Stakeholder Group	Degree of Support for Waiver	Provided Comment (Note: Items have been redacted to ensure privacy of stakeholders)
1237	12/15/21 14:47:23	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. *However, the state's draft waiver request should go further * and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1238	12/15/21 14:53:15	School Administrator	Strongly Support	These standardized tests are biased. Against Minorities.
1239	12/15/21 14:53:38	Other	Neither Support nor Oppose	(please see submitted letter) Dear Members of the New York State Education Department (NYSED): We are pleased to respond to your request for public comment on NYSED's federal waiver request for the 2021-22 School Year. We appreciate that NYSED believes the waiver is needed to protect schools' eligibility to apply to Title I School Improvement Grant Funds, and we support the timely and effective use of these funds in schools. We believe NYSED must take additional steps to advance educational equity in concert with its waiver application. [REDACTED] is a nonprofit organization that focuses broadly on educational opportunities, beginning with infant and toddler development and continuing to Pre-K through grade 12 schooling, higher education completion, and into early career and family support. We focus on work that cuts across issue silos to address the complex barriers to social and economic mobility at critical junctures in people's lives. In New York, we work with the [REDACTED] to advance more equitable practices and policies in schools, districts, and statewide. The Whole Child Equity project at the [REDACTED] seeks to apply recent advances in child development and brain sciences to improve the overall well-being of children and families and to improve educational outcomes — social, emotional, and academic — for children who experience racial and economic disparities. These are the students most vulnerable to the failures of schools and the “adjacent” child-serving agencies on which they depend. With new knowledge about science of learning and development and evidence-based practices, we believe public policy can take the transformation of education and adjacent systems to scale and improve the lives of many more people. In our submitted letter, we address each of the outcomes you identified as resulting from the granting of a federal waiver. While we agree that NYSED should not use 2021-22 school year data to identify or remove schools from identification as Comprehensive Support and Improvement Schools and Targeted Support and Improvement Schools, we believe NYSED must do more to more thoroughly support schools in need of improvement. NYSED should go beyond the terms of its waiver request and take affirmative steps to help educational leaders and key staff in identified schools undertake activities to support accelerated student learning. We also note that the lack of social and emotional learning assessments and the uneven consideration of social and emotional factors in back-to-school plans have actively hindered the ability of districts and schools to provide SEL programming and related supports. New York needs a social emotional plan for every district, but these plans must be accompanied by a robust set of expectations, strategies, programming, along with assessments to drive SEL learning and well-being across the state.
1240	12/15/21 14:53:51	Teacher	Support	Schools that fall into the Title I School Improvement and etc..struggled immensely due to schools being shut down during COVID and learning being altered in other ways such as half days, etc..demographics, family life etc...
1241	12/15/21 14:56:13	Teacher	Support	As a Kindergarten teacher in an elementary school, we are seeing students with a much different level of preparedness this year entering Kindergarten. The pandemic and a move to remote learning has not served our youngest learners well. Knowing that these students will forge a different path through public education, giving school districts the flexibility to meet the needs of their student population is very important for the next several years. For our youngest learners, we are losing some of the prime time for brain growth and development. We will likely see the consequences for many students in the years to come.
1242	12/15/21 15:04:45	Teacher	Strongly Support	As an Algebra teacher my students have come to me missing key content knowledges to be successful in this course. Therefore I am forced to teach material that my students would have come to Algebra knowing.
1243	12/15/21 15:07:39	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1244	12/15/21 15:17:13	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1245	12/15/21 15:17:24	Principal	Strongly Support	Thank you for considering feedback from schools.
1246	12/15/21 15:17:39	Teacher	Strongly Support	I am not only a teacher, but a parent as well. This waver is needed.

#	Date of Submission	Stakeholder Group	Degree of Support for Waiver	Provided Comment (Note: Items have been redacted to ensure privacy of stakeholders)
1247	12/15/21 15:19:10	Assistant Superintendent	Strongly Support	It is difficult to truly gauge the level of growth in students or the lack thereof with any sense of accuracy at this point. The system was flawed before the pandemic and its flaws in identifying using skewed data has only grown exponentially. I do believe that schools and teachers should be accountable for the success and growth of their students, however, the system in identifying schools needs to be greatly improved. It should be suspended at this time, due to the affects of the pandemic, remote learning, and learning loss.
1248	12/15/21 15:24:04	Parent	Strongly Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1249	12/15/21 15:29:04	Teacher	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1250	12/15/21 15:29:31	Teacher	Strongly Support	1. absenteeism is high right now for students. 2. the learning gap and lvl of work I am experiencing shows signs of learning deficits and their needs to be an adjustment for those factors.
1251	12/15/21 15:35:46	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022, and also ask for [1] a waiver from the requirement to administer any federally-mandated annual test (including grade 3-8 math and ELA and the NYSESLAT), [2] an off ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI)and [3] elimination of the 95% state test participation rule.
1252	12/15/21 15:37:17	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1253	12/15/21 15:39:00	Community Based Organization Leader/Representative	Strongly Oppose	<p>We understand that the past two school years have been exceptionally challenging for New York students and educators—with the ongoing effects of the pandemic, ever-evolving adjustments to teaching and learning, and the continued national reckoning with the impact of systemic racism. Unfortunately, the same students who experienced significant educational inequity prior to the pandemic remain the most underserved by our education system. According to a September 2021 parent poll by The Education Trust— New York, 84% of parents indicated that they were somewhat or very concerned about their child falling behind academically, with 63% of Black parents and 60% of Latinx parents expressing concern compared to 52% of White parents. Further, one in 10 parents from low-income households indicated that they worried their child would be less likely to graduate from high school because of the pandemic — more than twice that of parents from non-low-income households.</p> <p>With these concerns, it is vital that parents, teachers, policymakers and other education stakeholders have a clear understanding about how students are performing academically and whether or not their school is in good standing. State assessments have varied meaning for different stakeholders, and for the most important stakeholders – our students – they illuminate strengths, challenges and the areas where educators can support the most. Assessments also provide data that help local school districts to adequately measure, understand, and address the real academic impacts of the pandemic. To that end, we encourage NYSED to report the performance of schools on ESSA accountability indicators using results from the 2021-22 school year and use the results to make accountability determinations. Assessment results will help to identify schools across the state that need the most support and attention given NYSED's new focus on customer service and DEI. Further, it will encourage school districts to adopt strategies that increase student participation rates on exams which is needed now more than ever. Last school year, participation rates in statewide exams were at a historic low, with about 4 in 10 students participating in ELA and Mathematics tests statewide. While this low participation rate can be contributed to many factors, school districts will need to revitalize student participation in exams as many students have had two years without a clear measure of what they know and are able to do. Finally, the valuable information that comes from state assessment data is and should continue to be, connected to resource allocation decisions that can better and more equitably serve students. As schools receive historic funding including additional State Aid and ARPA, it is imperative that leaders use data to ensure that the resources are directly impacting those who need it most.</p> <p>We are grateful to the department for instituting the full battery of assessments this upcoming spring; however, we must ensure that the results are back sooner so that action can be taken toward improvement. The high school graduating class of 2020 and 2021 were thrust into a new world, and it is tragic that we are not clear on whether or not they have skills – academic and others– to excel in their postsecondary opportunities. New York's education system has a responsibility to provide all stakeholders with consistent, accurate information about whether students in our systems are making progress towards meeting state academic standards and whether or not students are attending a school that is providing them with a high-quality academic experience. Not identifying schools in the bottom 5-10%, ensuring that families know of such schools and supporting the schools on a guided improvement path is to deny students of a fair and adequate education – seemingly counter to any work that centers diversity, equity and inclusion.</p>

#	Date of Submission	Stakeholder Group	Degree of Support for Waiver	Provided Comment (Note: Items have been redacted to ensure privacy of stakeholders)
1254	12/15/21 15:40:04	Parent	Support	<p>NYSESED must be allowed a waiver from ESSA obligations for spring 2022 AND any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT.)</p> <p>Schools wishing to exit from accountability designations (such as TSI, CSI) must be offered a reasonable and effective way to do so, and the 95% state test participation rule must be eliminated!</p>
1255	12/15/21 15:53:04	Teacher	Strongly Support	<p>We have had a difficult transition in the classrooms. As an elementary teacher that taught in-person through the hybrid model during the peak of the pandemic, and supported students with a remote after school program, I know just how many challenges my students have faced and how deep they have affected them. I know that students are finally easing into routines and schooling. Aside from the lagging inclusivity and equity that the standardized assessments still portray, in my opinion, there is so much emotional turmoil that our students still suffer and tangible financial distress, that adding an additional stressor is not going to accurately portray students' academic achievement. Furthermore, considering determining school improvement or teacher efficacy should not be burdened by the aftermath of the pandemic.</p>
1256	12/15/21 16:03:34	Parent	Support	<p>I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further **and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.</p>
1257	12/15/21 16:06:05	Teacher	Support	<p>Please stop influencing and supporting nonsensical mask mandates. Please do not support any vaccine mandates for staff or students. Stay out of individual health decisions.</p>
1258	12/15/21 16:06:47	Union Leader/Representative	Strongly Support	<p>I do not believe it would be fair to utilize this score at this time. The pandemic has caused many gaps and learning deficits. Those still need to be sorted through. Furthermore, I am not in support of high-stakes tests to any degree.</p>
1259	12/15/21 16:15:54	Teacher	Strongly Support	<p>Currently Covid positive rates and quarantining of students has negatively impacted regular attendance fragmenting instruction. Families are impacted by the pandemic in many ways beyond attendance that has had detrimental effects of student learning. The 2020-21 school year is NOT a normal school year, and ESSA and APPR was designed to measure schools and the personnel within during normal times. We are not in normal times th, therefore the measures of accountability are inappropriate to be used.</p>
1260	12/15/21 16:17:04	Parent	Support	<p>I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further **and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.</p> <p>To understand my reasoning for the above, please read this statement from [REDACTED]</p>
1261	12/15/21 16:19:34	Parent	Support	<p>I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further **and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.</p> <p>To understand my reasoning for the above, please read this statement from [REDACTED]</p>
1262	12/15/21 16:36:03	Assistant Superintendent	Strongly Support	<p>Given our current accountability metrics and calculations there is no sound methodology with which we can move forward to equitably identify schools and districts in NYS. Comparability to previous year's targets are not possible due to missing data, the ongoing impact of quarantines on absenteeism, and gaps in access to curriculum/instruction during the pandemic will take additional time to effectively address. I might suggest going farther to use 2021-22 data to set new baselines so that next school year may be used to show growth from the current school year (new target setting). Acknowledge that current designations placed on schools are based on data from students that have long left many those schools, please consider resetting current designations as schools and districts have not had the opportunity to demonstrate growth and improvement.</p> <p>With students returning to the classrooms, we are now faced with new challenges, gaps in skills, and need to address to the social emotional needs of our students which are not captured through traditional metrics. The spirit of the law, was to assist schools and districts which most needed intervention, through additional resources, access to best practices and guidance needed for continued improvement. Using lagging and incomplete data for determinations, target setting, and identification runs counter to the spirit of the law and runs the risk of mere compliance over improved practice.</p>
1263	12/15/21 16:40:00	Parent	Support	<p>I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further **and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.</p> <p>To understand my reasoning for the above, please read this statement from [REDACTED]</p>
1264	12/15/21 16:41:01	Other	Support	<p>We are still desling with pandemic</p>

#	Date of Submission	Stakeholder Group	Degree of Support for Waiver	Provided Comment (Note: Items have been redacted to ensure privacy of stakeholders)
1265	12/15/21 16:41:18	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule.
1266	12/15/21 16:42:32	Parent	Support	I support NYSED's request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request should go further ** and also ask for (1) a waiver from the requirement to administer any federally-mandated annual tests (including grade 3-8 math and ELA and the NYSESLAT), (2) an off-ramp that does not rely on test scores or test participation rate for schools wishing to exit from accountability designations (such as TSI, CSI), and (3) elimination of the 95% state test participation rule. To understand my reasoning for the above, please read this statement from [REDACTED]
1267	12/15/21 16:44:55	Community Based Organization Leader/Representative	Strongly Support	We agree with NYSED's assessments that the data from 2021-2022 will not be meaningful or valid in evaluating schools using the required accountability formulas. The pandemic is still very much impacting families of public school students in NYC, particularly Black and Latine students, Multilingual learners, immigrant students, students living in poverty, in shelters or in foster care: in other words, the historically marginalized students for whom the pre-pandemic school system was not working. It is our hope that we not only ask for exemption from the accountability requirements but we begin demanding the federal government work with rights-holders to re-think public education and school systems in this country. We cannot return to "normal" after the pandemic. The pandemic should be the kick in the behind this nation needed to begin dismantling the oppressive system of education.
1268	12/15/21 16:45:35	School Staff	Strongly Support	Standardized tests so soon after a shutdown is not good educational practice.
1269	12/15/21 16:48:06	Parent	Support	I support the waiver request in that I agree that the state should be waived from having to identify new CSI and TSI schools based on pandemic year test scores. HOWEVER, this draft falls FAR short of what you should be asking of ED. First and foremost, it is disappointing that you do not ask for a waiver from having to give the tests, at all. Like it or not, we are still in the pandemic. Recently, I have received near daily emails from my child's school about new COVID cases, resulting in quarantines and partial classroom closures. In NYC alone, the number of student cases for the week ending 12/12/21 is FOUR times higher than it was in late October, and that is with super minimal testing, so who knows what it really is. This is still not a normal year and you yourselves make a compelling case for that when you ask to be waived from making accountability determinations, so why would you not follow this reasoning to its logical conclusion and ask for a suspension of the tests, as you did last year? Could you be turned down? Of course, but if you don't even ask and make the case...Please amend the draft to ask for a waiver from test administration. The other thing you should be asking for, especially since you did not even ask for a waiver from giving the test, is a waiver of the 95% participation rule. Even in the best of times, this rule is coercive and asks families to go against their best judgement of how student and educator time should be spent. But during a pandemic? You are basically asking for students to be sent in to test, including those who could be contagious, to meet this arbitrary rule. I'd rather reserve a 95% rule for 95% vaccinated. Finally, as was the case last year, you asked to be waived from identifying new CSI and TSI schools, but you did not ask for a waiver of exit criteria from this status. I'd like to see you amend the draft proposal to do so. NY's ESSA plan makes exit from CSI or TSI status contingent on either raising test scores or increasing test participation. While I disagree with this in the first place, schools in this status prior to the pandemic have been caught in limbo, unable to exit as the tests were not given at all in 2020, and administration was restricted in 2021. As a result, it was impossible to increase scores or participation so the schools remain labeled. (Contrary to the glowing language about "supports" in the draft proposal, most families and educators I know in CSI schools experience this support as onerous, as it ratchets up paperwork and the monitoring from outsiders feels oppressive. They want to be rid of the label and its accoutrements.) I'll end this by saying I agree with much of what was written in the draft report, particularly the state standing behind its DEI framework and acknowledging that there is more to an education than numbers. But in your role as the advocate for NY's school children with the federal government, you need to be pressing for more. Otherwise, it's just pretty language. For a more in-depth response, check this out: [REDACTED] I agree with it entirely.
1270	12/15/21 16:50:05	Student	Strongly Support	The unique situation students were put through over the past couple of years did not lend to an adequate learning environment. Thus, many students were not able to grasp the curriculum in its entirety as is expected in a standard learning environment in the classroom. These unprecedented circumstances mean that students began the 2021-2022 school year at a disadvantage and needed to be retaught or reintroduced to essential skills they were to have mastered during the 2020-2021 school year. It would be unfair to use data from this school year as the results would be skewed and would not lend to fair judgement on school administrators and teachers.

Public Interest Survey Online Submission Form

A Survey for a Possible Waiver Request to USDE for the 2021-22 School Year

The New York State Education Department (NYSED or "The Department") is accepting stakeholder input on a potential waiver request to the United States Department of Education (USDE) for determining school accountability based on results from the 2021-22 school year under the Every Student Succeeds Act (ESSA). To seek input from teachers, principals, superintendents, parents, and other stakeholders, NYSED has developed, "A Survey for a Possible Waiver Request to USDE for the 2021-22 School Year." The Department is accepting responses to the survey through 5:00 PM EST on Friday, November 19, 2021. For more information about the ESSA state plan, please visit the Department's ESSA website at <http://www.p12.nysed.gov/accountability/essa.html> (<http://www.p12.nysed.gov/accountability/essa.html>).

Questions concerning this survey can be directed to ESSAcomments@nysed.gov (<mailto:ESSAcomments@nysed.gov>). Thank you for providing your valuable feedback.

* Required

1. Which of these terms best describes you? *

- ☐ Parent/Legal Guardian of at Least One Student Attending K-12 Schools
- ☐ Student
- ☐ School District Superintendent
- ☐ Teacher
- ☐ Principal or Other School Administrator
- ☐ Other District Personnel
- ☐ School Support Staff
- ☐ Other

2. Which school level are you primarily involved with? Please check all that apply. *

- ☐ Elementary (Grade Levels K-5)
- ☐ Middle (Grade Levels 6-8)
- ☐ High School (Grade Levels 9-12)
- ☐ I am not directly involved with any level of K-12 schooling.

3. Which statement most closely represents your opinion? *

- ☐ NYSED should neither report the performance of schools on ESSA accountability indicators using results from the 2021-22 school year nor use the results to make accountability determinations.
- ☐ NYSED should report the performance of schools on ESSA accountability indicators using results from the 2021-22 school year for informational and planning purposes, but not use the results to make accountability determinations.
- ☐ NYSED should report the performance of schools on ESSA accountability indicators using results from the 2021-22 school year and use the results to make accountability determinations.
- ☐ Other. Please explain in the following question.

4. If you checked "Other" for Question 3, please explain. If you did not check "Other," you may leave this response blank.

5. If NYSED pursues an accountability waiver to USDE, which of the following flexibilities should NYSED request? Please check all that apply. *

- ☐ NYSED should request the flexibility to not identify new Comprehensive Support and Improvement (CSI) Schools using 2021-22 school year results.
- ☐ NYSED should request the flexibility to exit existing CSI Schools based on revised criteria using 2021-22 school year results.
- ☐ NYSED should request the flexibility to not identify new Targeted Support and Improvement (TSI) Schools using 2021-22 school year results.
- ☐ NYSED should request the flexibility to exit existing TSI Schools based on revised criteria using 2021-22 school year results.
- ☐ NYSED should request the flexibility to not identify new Target Districts using 2021-22 school year results.
- ☐ NYSED should request the flexibility to exit existing Target Districts based on revised criteria using 2021-22 school year results.
- ☐ NYSED should maintain current identifications (i.e. CSI, TSI, and Target Districts) for the 2022-23 school year.
- ☐ NYSED should request the flexibility to use results from the 2021-22 school year to establish new baselines for accountability indicators for future accountability determinations.
- ☐ There should be no accountability waiver and NYSED should make accountability determinations using results from the 2021-22 school year.
- ☐ Other. Please explain in the following question.

6. If you checked "Other" for Question 5, please explain. If you did not check "Other," you may leave this response blank.

7. Please use the space below to share any thoughts or ideas you may have regarding a possible waiver request to USDE for accountability determinations based on results from the 2021-22 school year.

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 Microsoft Forms

Public Comment Online Submission Form

Public Comment On NYSED's Federal Accountability Waiver Request for the 2021-22 School Year

The New York State Education Department (NYSED or "The Department") is accepting public comment on a proposed request to the United States Department of Education (USDE) seeking a waiver to not make accountability determinations and school improvement identifications using data from the 2021-22 school year and to provide flexibility in the use of Title I School Improvement Funds. **NYSED is accepting public comment through 5:00 PM EST on Wednesday, December 15, 2021.** Questions regarding the draft waiver can be sent to: essacommments@nysed.gov (<mailto:essacommments@nysed.gov>).

If the proposed waiver is granted, New York will:

- Not use 2021-22 school year data to identify or remove schools from identification as Comprehensive Support and Improvement Schools and Targeted Support and Improvement Schools;
- Not assign accountability levels to schools or subgroups of students on each of New York's accountability indicators;
- Provide schools that are at risk of identification as Targeted Support and Improvement Schools based on their 2018-19 school year performance the opportunity to apply for Title I School Improvement Grant Funds. (Without a waiver these schools would not be eligible to participate in this grant.)

A full text of the waiver can be found here: www.nysed.gov/essa/assessment-and-accountability-waivers (<http://www.nysed.gov/essa/assessment-and-accountability-waivers>).

Please note that all questions below are optional.

1. First Name

2. Last Name

3. Please indicate which of the following stakeholder groups best describes you as it relates to your public comment.

I am a/an:

- ☐ Assistant Superintendent
- ☐ Business Leader
- ☐ Community Based Organization Leader/Representative
- ☐ District Personnel
- ☐ Parent
- ☐ Principal
- ☐ School Administrator
- ☐ School Staff
- ☐ Student
- ☐ Superintendent
- ☐ Teacher
- ☐ Union Leader/Representative
- ☐ Other


4. What is the name of the organization, if any, with which you are associated with (e.g., school name, community organization)?

5. To what degree do you support NYSED's proposed waiver request?

- ☐ Strongly Support
- ☐ Support
- ☐ Neither Support nor Oppose
- ☐ Oppose
- ☐ Strongly Oppose
- ☐ Don't Know/No Opinion

6. Please input below any comments you wish to be considered. If you have a letter from your organization that you would like to attach to this public comment, please email to: essacommments@nysed.gov (<mailto:essacommments@nysed.gov>).

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Congress of the United States
Washington, DC 20515

December 15, 2021

Dr. Betty A. Rosa
Commissioner of Education
New York State Education Department
89 Washington Avenue
Albany, New York 12234

Dear Commissioner Rosa,

As a representative of New York's 16th congressional district and a former New York educator, I submit this comment in support of the New York State Education Department's request for a waiver of specified federal accountability requirements for the 2021-2022 school year.

The COVID-19 pandemic has caused unprecedented loss and stress for students, teachers, and communities. Our first priority must be to support students' needs holistically. Just this month, the U.S. Surgeon General issued an advisory on the importance of protecting youth mental health especially in the wake of the pandemic.¹ More than 140,000 children in the U.S. have lost a parent or grandparent caregiver due to the pandemic and rates of psychological distress among young people have increased substantially.² The effects of COVID-19 have been especially acute among Black and brown students as well as students from low-income communities.

Educators across our state are working every day to help their students recover emotionally and academically amidst the ongoing public health crisis. It is incumbent upon policymakers to meet our students and schools where they are in this effort. Waiving the federal accountability requirements for the 2021-2022 school year is crucial to allowing educators to focus on the socioemotional and academic needs of their students rather than having to devote their scarce time and resources to preparing for high-stakes assessments. Imposing accountability and school identification requirements this school year would only exacerbate the stress our students and teachers are currently facing. Supporting the needs of the whole child requires providing schools with the flexibility and support to respond to the compounding crises they face without imposing additional burdens.

¹ "U.S. Surgeon General Issues Advisory on Youth Mental Health Crisis Further Exposed by COVID-19 Pandemic," December 7, 2021. *U.S. Department of Health & Human Services*.

<https://www.hhs.gov/about/news/2021/12/07/us-surgeon-general-issues-advisory-on-youth-mental-health-crisis-further-exposed-by-covid-19-pandemic.html>

² "Protecting Youth Mental Health: The U.S. Surgeon General's Advisory," December 7, 2021. *U.S. Department of Health & Human Services*.

<https://www.hhs.gov/sites/default/files/surgeon-general-youth-mental-health-advisory.pdf>

Furthermore, it is clear that requiring New York to return to pre-pandemic accountability and school identification systems during the 2021-2022 school year would jeopardize the state's ability to equitably serve all students, as demonstrated in your waiver request. A return to accountability systems this year would prevent educators from being able to focus on the holistic needs of vulnerable student subgroups, such as students with disabilities, English language learners, students of color, and economically disadvantaged students. Additionally, given the limits on data collection and analysis as a result of the pandemic, the measures underlying accountability decisions would be biased. Requiring NYSED to make school identification based on invalid and unreliable data could harm the very students that we aim to protect.

Especially in times of crisis, we must prioritize the expertise and lived experiences of those most proximal to the issues at hand. NYSED's waiver request is clearly grounded in consultations with education stakeholders across the state who know what is best for their communities and their students. I am confident that NYSED can provide extensive support to schools, including previously identified CSI, TSI, and ATSI Schools, without having to impose or exacerbate stress on students and teachers by restarting accountability determinations in the 2021-2022 school year.

I stand in solidarity with students, teachers, and families across New York and strongly support your efforts to seek a waiver from federal accountability and school identification requirements for the 2021-2022 school year. I believe our priority should always be to support the needs of the whole child, and we cannot do so by exacerbating the stress our students and teachers are already facing as a result of the pandemic.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Bowman', with a long horizontal flourish extending to the right.

Jamaal Bowman, Ed.D.
Member of Congress

December 7, 2021

Hon. Miguel Cardona
Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-6100

Dear Secretary Cardona:

The New York State Education Department's (NYSED) Technical Advisory Committee (TAC) supports NYSED's request for a waiver of Section 8401 of the Elementary and Secondary Education Act (ESEA) for the 2021-22 school and district accountability requirements based on our technical expertise and our concerns about the potential misuse of educational test scores. Given the very low participation rates throughout New York for the summative assessments in English language arts and mathematics in the Spring of 2021, any use of those aggregate test scores is suspect and may lead to misleading interpretations about the achievement of groups of students. There is insufficient validity evidence for the standard use of test scores to evaluate schools as the lack of participation makes it difficult to generalize results and attribute any gains or losses to a school or district. This concern includes using these 2021 test scores as a baseline for making any inferences about the characteristics and uses of test scores in 2022.

Our work as educational measurement experts and psychometricians is guided by the *Standards for Educational and Psychological Testing*, published jointly by the American Educational Research Association (AERA), the American Psychological Association (APA), and the National Council on Measurement in Education (NCME), and revised most recently in 2014. As these standards make clear, we have a professional obligation to assure that educational and psychological test scores have valid interpretations and are used appropriately, specifically as guided by the following Standards:

3.6: *Where credible evidence indicates that test scores may differ in meaning for relevant subgroups in the intended examinee population, test developers and/or users are responsible for examining the evidence for validity of score interpretations for intended uses for individuals from those subgroups. What constitutes a significant difference in subgroup scores and what actions are taken in response to such differences may be defined by applicable laws.*

13.5: *Those responsible for the development and use of tests for evaluation or accountability purposes should take steps to promote accurate interpretations and appropriate uses for all groups for which results will be applied.*

13.7: *When tests are selected for use in evaluation or accountability settings, the ways in which the test results are intended to be used, and the consequences they are expected to promote, should be clearly described, along with cautions against inappropriate uses.*

13.8: *Those who mandate the use of tests in policy, evaluation, and accountability contexts and those who use tests in such contexts should monitor their impact and should identify and minimize negative consequences.*

The possibility of inappropriate uses and negative consequences of the aggregate 2021 test scores is high and such uses are likely to disproportionately affect different groups of students. All consequential interpretations and uses of educational tests must be based on reliable and valid interpretations of those test scores. The TAC does not believe that the 2021 test participation rates were high or consistent enough to warrant accountability uses of tests in 2022. The students who sat for the accountability tests in 2021 do not constitute a representative sample of students in New York, their districts, or even most schools. Thus, the NY TAC strongly supports NYSED's waiver request.

Sincerely,



Howard T. Everson, Ph.D.
Co-Chair NYSED Technical Advisory Committee
Professor (Visiting)
Graduate Center, City University of New York



Co-Chair NYSED Technical Advisory Committee
President
Measurement in Practice, LLC

Empire State Supervisors and Administrators Association



11300 Veterans Memorial Pkwy, Ste 330 | Hauppauge, NY 11788
888.88.ESSAA | www.essaa.org | info@essaa.org

December 15, 2021

Jason Harmon, Assistant Commissioner
Office of Accountability
New York State Education Department

Dear Mr. Harmon,

On behalf of our organization, I wish to express our full support for the request put forth by NYSED to the USDE to not make accountability determinations and school improvement identifications using data from the 2021-22 school year and to provide flexibility in the use of Title I School Improvement Funds.

School leaders in New York are committed to using assessment data to drive instructional decision making and promote shared accountability for student achievement. State assessment data generated during the pandemic in 2020-21 should only be used by schools in a limited capacity. We assert this data to be inadequate for use to identify Comprehensive Support and Improvement Schools and Targeted Support and Improvement Schools. We believe that assigning accountability levels to schools or subgroups based on these results could be counterproductive to ongoing school improvement efforts. At the same time, allowing schools that are at risk of identification the ability to apply for Title I funds proactively has the potential to enhance school improvement efforts.

We are grateful for the Department's advocacy in pursuing this waiver and ongoing support for efforts to improve teaching and learning in New York.

Sincerely yours,

Carol L. Conklin-Spillane, ESSAA President



MAINE-ENDWELL
CENTRAL SCHOOL DISTRICT
Administrative Offices

December 1, 2021

Commissioner Betty A. Rosa
New York State Education Department
89 Washington Avenue
Albany, New York 12234

Dear Commissioner Rosa:

My name is Jason R. Van Fossen, Superintendent of Schools for the Maine-Endwell Central School District (Broome-Tioga BOCES) and I am writing to express my strong support for the proposed federal waiver for state accountability requirements and school improvement funding. The need to delay one more year is critical to ensuring the ESSA accountability system can be equitably and responsibly implemented.

As you and the Board of Regents are aware, the COVID pandemic continues to significantly impact New York State school districts. The two most prominent concerns facing not only our district, but my colleagues across the state are:

- Addressing significant learning loss across all grade levels with significant emphasis placed on grades 3-8.
- Addressing social, emotional, and mental impacts to student behavioral development and / or growth.

Despite the tremendous efforts of school districts across New York State, the end of the 2019-2020 school year and much, if not all, of the 2020-2021 school year included major upheavals to academic, social, and behavioral routines, expectations, and norms. When one considers the fifty-three weeks of lost or impacted learning, loss of social interactions, loss of support systems, loss of routines including regular meals, loss of co-curricular activities, and the emotional loss of life – impacting thousands of families across the entire state – 2021-2022 has been and will be a ‘work in progress. Pragmatically and responsibly speaking, faculty and staff across the state have looked at 2021-2022 as a ‘build back’ year.



MAINE-ENDWELL

CENTRAL SCHOOL DISTRICT

Administrative Offices

Since September 2021, educators across the entire state are triaging student's needs. Significant academic and behavioral gaps exist. To assume we would begin the year able to meet or exceed curriculum, instructional, and assessment requirements, as of December 1, 2021, is laughable. Sadly, the reality is we have much bigger concerns. For example:

- Students...
 - have significant mathematical and literacy gaps
 - struggle with peer interactions
 - continue to be influenced and impacted by social media interactions.
- Faculty members...
 - see a widening academic gap within classrooms
 - see students who are incredibly divisive and intolerant of one another.
- Building and district leaders...
 - recognize the important and relevance of Maslow's Hierarchy of Needs more than ever.

To ask faculty members, building principals, and school districts to 'push ahead' with implementation of accountability measures is not only tone-deaf but incredibly inhumane. Accountability standards and expectations will not 'fill gaps', build more tolerant and kind human beings, or inspire and motivate faculty and staff. Giving the greatest gift – time – would go the farthest in helping to repair, fill, and grow our students.

On behalf of the Maine-Endwell CSD, we support your request for the federal waiver. If you need any additional information or would like to speak directly, please do not hesitate to contact me at 607-754-1400 (x2311) or via email at jvanfossen@me.stier.org.

Very Sincerely,

Jason R. Van Fossen,
Superintendent of Schools



December 15, 2021

BY ELECTRONIC MAIL

Jason Harmon, Assistant Commissioner
Office of Accountability
New York State Education Department
89 Washington Avenue, Room 875 EBA
Albany, NY 12234
ESSAComments@nysed.gov

Dear Assistant Commissioner Harmon,

On behalf of New York City Department of Education (NYCDOE), Chancellor Meisha Porter, and the students, families, staff, and community members of New York City schools, we thank you for the opportunity to comment on New York State's proposed federal waiver for state accountability requirements.

We support many points made by the New York State Education Department (NYSED) in the draft waiver request letter, notably the State's commitment to acknowledge the ongoing impact of the COVID-19 pandemic on students and schools and their decision that one cannot meaningfully differentiate school performance in 2021-22 in a way that also upholds the values of inclusion and equity-centered decision-making.

We agree with the decision to request a federal waiver for state accountability determinations for the year, not only as means to allow NYSED to gradually turn on its accountability practices, but also allow schools to focus and re-center their learning in social-emotional support of students and school communities.

The examples provided by NYSED regarding the impact of the other accountability re-start options — including using data from 2018-19 and 2020-21 or only using 2021-22 data — underscore our belief that accountability determinations should be made with 2022-23 data at the earliest.

- Concerns with making accountability determinations using 2021-22 data and 2020-21 data: A significant number of students in our city did not participate in the grades 3-8 assessments in 2020-21 as remote learning was accommodated for by the accountability waiver provided by the United States Department of Education (USDE). With only about a quarter of students in New York City participating last year in the assessments, no meaningful conclusions could be drawn for individual school or district performance.
- Concerns with making accountability determinations using 2021-22 data and 2018-19 data: Data from 2018-19, while more complete than 2020-21, would lead to unfairly drawn conclusions from stale, pre-pandemic performance and it would not actually reflect the needs of current students served by our schools. Schools are focused on their current students, and so should our accountability system. Identifying schools for additional supports based on data from several years ago will not lead to focusing such support on the schools most in need of such interventions. Further, designations based on 2018-19

data would also be met with skepticism by schools for being based on untimely data that does not acknowledge the trauma and loss experienced due to the COVID-19 pandemic.

- Concerns with making accountability determinations using only 2021-22 data: NYSED's modeling on the impact that using 2021-22 data only would have on the proportion of subgroups that could be inaccurately included in school accountability is startling. The calculation limitations noted — including the inability to calculate metrics like Safe Harbor and Accelerated Growth — and the subsequent impacts to Academic Progress, Chronic Absenteeism, Graduation Rate, and CCCR calculations are particularly concerning to NYCDOE as it would disproportionately impact NYC schools given the higher percentages of students of color and economically-disadvantaged students.

As noted by NYSED, we affirm that our schools are focused on supporting students in a successful return to their school buildings by prioritizing social-emotional supports, health resources, and academic interventions. Our schools, but more importantly our students, do not need the additional stress of accountability determinations placed on them at this time, particularly when those determinations would at worst be inaccurate and at best untimely and not representative of the needs of the current student population.

We ask one additional item of NYSED as they consider the next steps for state accountability with 2021-22 data, the continued affirmation that — regardless of USDE's decision with the accountability determination waiver — Receivership schools will not be held to Demonstrable Improvement decisions for stakes based on 2021-22 data. We appreciate the vigor with which NYSED asserts that our schools need additional time before accountability determinations can be made in its draft waiver request letter. We ask that NYSED apply that same level of care and concern about the accuracy of accountability determinations in the Receivership context, regardless of the status of its waiver request. We kindly remind NYSED that Receivership determinations are under the purview of the Commissioner's Regulations and are not federally mandated under ESSA. We strongly request that NYSED continue to grant Receivership schools the time to focus on student re-entry and re-acclimation, and not the high-stakes nature of their Demonstrable Improvement indicators.

Regarding NYSED's request to waive the limitations of Section 1003(b)(1)(a) directing Title I School Improvement funds only to identified CSI and TSI Schools, we agree with this proposal. Expanding the cohort of schools supported with dedicated Title I School Improvement funds and activities to include schools at risk for identification for improvement pre-pandemic will enable access to resources to identify and address emerging equity gaps and student needs, while maintaining ongoing support for previously identified districts and schools.

Thank you for the opportunity to provide comments on NYSED's waiver request to USDE.

Best regards,



Sharon Rencher
Senior Executive Director
State/Federal Education Policy and Planning
Division of the First Deputy Chancellor
SRenche@schools.nyc.gov



Charles S. Dedrick
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charles@nyscoss.org

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December 15, 2021

Honorable Betty A. Rosa
Commissioner of Education
New York State Education Department
89 Washington Avenue
Albany, New York 12234

Dear Commissioner Rosa:

I am writing in support of the State Education Department's potential waiver request to the U.S. Department of Education (USDE) to forego use of state test results from the 2021-22 school year for school and district accountability determinations under Every Student Succeeds Act (ESSA).

Fundamentally, we agree with the Department's conclusions as stated in the waiver request:

NYSED strongly believes that making accountability determinations using 2021-22 school year data alone, or in combination with data from the 2018-19 school year or 2020-21 school year, would dramatically undermine confidence in the accountability system and hinder New York State's [diversity, equity, and inclusion] goals to improve academic outcomes and to promote equitable learning environments. The accountability system would be considered biased against schools that educate student populations with the most challenges, regardless of how much progress and growth is achieved.

New York's approved ESSA accountability system was carefully designed with intensive stakeholder engagement. It makes thoughtful use of data to create a "three-legged stool" of school and district performance measures, combining achievement, growth, and progress.

Pursuant to the U.S. Education Department's action in March 2020, all states were allowed to forego administering assessments required under ESSA in spring 2020 and New York exercised that option.

In 2020-21, New York administered the required assessments, but in modified form, using authority granted by the USDE. Some tests were reduced in length and were allowed to be administered over extended time spans. Given the federally approved assessment modifications for 2020-21, it would be invalid to use results from those assessments in drawing conclusions about historical trends to be applied in growth or progress calculations. Because of the varied circumstances under which students took those assessments and the variation in participation rates across schools, we

are certain as well that it is not possible to make valid comparisons of true school and district performance from results for the 2020-21 school year.

This past September, we all hoped that the current school year would allow a return to familiar routines, but that has not been entirely possible and there will likely once again be wide variation in both the circumstances under which students take required assessments and in the participation rates across schools and districts.

Your waiver request quotes professor Sean Reardon,

If you had a random sample of kids [in the testing pool], then that would be fine...but testing in 2021 wasn't random. Kids and families chose whether they took the test. Unless you have a lot of information to support a claim of comparability, I think the default assumption for 2021 is that they're not comparable [to 2019 test scores].

We concur with the professor's conclusion. We add that neither are these variations in participation random in their effects. As the Department's request notes, a significant number of students received hybrid or entirely remote instruction and did not participate in grades three through eight assessments in 2020-21. In a February 22, 2021 letter to chief state school officers, USDE foresaw that this outcome was possible and noted, "Certainly, we do not believe that if there are places where students are unable to attend school safely in person because of the pandemic that they should be brought into school buildings for the sole purpose of taking a test."

Here in New York, students with disabilities, English language learners, students of color, and students from economically disadvantaged backgrounds participated in the assessments at much lower rates than the entire pool of students statewide. Because the greater of either students tested or 95% of all students eligible for participation must be used as the denominator in calculating the percentage of students meeting standards, schools and districts with depressed participation rates risk triggering one of the factors which can contribute to designation as a target district or as a school identified for either comprehensive or targeted support and improvement.

To the extent similar patterns of participation may prevail with the next round of assessments, that would argue against use of results exclusively from 2021-22 assessments in making new accountability designations.

We agree with the Department's conclusion that, "Accountability determinations based on incomplete and non-representative data would undermine confidence in the accountability system, have significantly negative effects on schools..." and would not uphold standards identified by the American Educational Research Association, the American Psychological Association, and the National Council on Measurement in Education.

We note also, that in approving New York's request last spring to forego making new accountability designations, a USDE official encouraged states, school districts, and schools to

“...consider steps to *further reduce the stakes of assessments from 2020-21* [emphasis added].” This remains a valid objective for the current school year. Students and educators are now in the third year of coping with all the abnormal routines and accompanying stresses brought on by the pandemic.

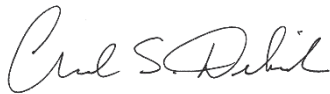
The aforementioned is true for schools everywhere in America. In New York, we have an additional concern. For several years, our state experienced severely depressed participation rates in federally required student assessments. This plunge was provoked, at least in part, by mandated uses of assessment results that were seen as inappropriate by many, including our members. It degraded the validity of the results for purposes which our members continued to value—to gauge how their district’s instruction aligned with state standards. Depressed participation rates now would also damage the validity of assessment results for purposes endorsed by the USDE in offering flexibility to states in the last school year—“...to focus on assessments to provide information to parents, educators, and the public about student performance and to help target resources and supports.”

In more recent years, our participation rates rebounded. Accordingly, now we do not want another questionable use of assessment results to spark renewed test-refusals.

Finally, we note that while the state would forego identifying additional schools as requiring improvement and support, if the waiver is granted, the Department plans would not neglect the needs of schools whose performance results indicate that they are at-risk of being so identified. Another element of the waiver request seeks authority to direct Title 1 school improvement funds to these “pre-identified” schools. The Department has also continued and intensified its assistance to previously designated schools and districts.

For all the reasons outlined above, we endorse the New York State Education Department’s waiver request and commend you and your colleagues for your efforts on behalf of our schools and students.

Sincerely,



Charles S. Dedrick, Ed. D.
Executive Director



December 15, 2021

Commissioner Dr. Betty Rosa
Chancellor Dr. Lester Young
NYS Education Department
89 Washington Avenue
Albany, NY 12234

Dear Commissioner Rosa and Chancellor Young,

The NYS Congress of Parents and Teachers, Inc. (NYS PTA) is honored to represent the families of our 2.6 million school children and our nearly 250,000 members. It is our mission to make every child's potential a reality and support EVERY child with ONE voice.

We write to formally support your proposed waiver request to the U.S. Department of Education (USDE) related to state accountability requirements under the Every Student Succeeds Act (ESSA) and Title I School Improvement Funding.

As you're aware, the NYS Education Department waiver request proposes to eliminate certain accountability indicator requirements to identify schools for improvement in Fall 2022 based on 2021-22 school year results.

Further, the proposed waiver request also seeks to use Title I School Improvement funds to support certain schools in good standing which were previously identified as at risk of becoming identified as a Targeted Support and Improvement School prior to the pandemic, but were not identified due to pandemic-related changes to the accountability system.

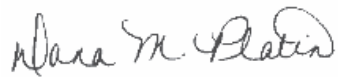
We fully support the aforementioned proposals. These continue to be trying times. Support for our students, our educators, and our schools is paramount. We continue to applaud all of our educators, our school leaders, and our school-related professionals for their tireless work in supporting children and their families. Now is the time that we must continue to support them.

Our students across the state have had varied academic opportunities since March 2020. Our students continue to deal with new and increasing mental health concerns, trauma, and uncertainty. Last school year, many students were full remote, many were hybrid, while some remained in classrooms – the disparities were endless. It would be wholly unfair to continue our current accountability system given the circumstances schools and students have endured over the past 21 months – sometimes penalizing schools themselves for having to operate in pandemic conditions, attempting to educate our student population equally while keeping all our of children safe in very different conditions.

Thus, for equity reasons, we request USDE approve the NYS Education Department waiver proposal, and fully support your efforts.

As always, NYS PTA stands ready to work collaboratively to support ALL children and families and we look forward to our future plans in family engagement. We are available at any time by contacting our Executive Director, Kyle Belokopitsky, at execdirector@nyspta.org or 518-452-8808 (office) or 518-817-3017 (cell).

Sincerely,

A handwritten signature in black ink that reads "Dana M. Platin". The script is cursive and fluid.

Dana Platin, President

A handwritten signature in black ink that reads "Kyle McCauley Belokopitsky". The script is cursive and somewhat stylized.

Kyle Belokopitsky, Esq., Executive Director

Cc: Dr. Kimberly Wilkins
Dr. James Baldwin

December 15, 2021

Dr. Betty A. Rosa, Commissioner
NYS Education Department
89 Washington Avenue
Albany, NY 12234

Dear Commissioner Rosa:

On behalf of the New York State School Boards Association (NYSSBA), please accept these comments in support of the New York State Education Department's (Department) proposed federal waiver to the state accountability requirements under the Elementary and Secondary Education Act (ESEA), as amended by Every Student Succeeds Act (ESSA) for the 2021-2022 school year.

Pursuant to those requirements, states must have a school accountability system in place that meaningfully differentiates the performance of all public schools on an annual basis, and that also identifies schools for comprehensive and targeted support and improvement. New York's school accountability system complies with these requirements based on data derived from a variety of measures, including state assessments, that provides information on student achievement, progress, and growth.

While we had all hoped that the pandemic would be behind us this school year, it is evident this is not the case. The ongoing COVID-19 pandemic continues to cause unprecedented disruption to public education in New York and is placing tremendous strain on both the physical and mental well-being of students, teachers, support service providers and others within the entire school community statewide.

In consideration of these and other factors, during the last two pandemic-impacted school years, the Department canceled one state test administration and in the following year altered its standard test administration practices. In addition, in 2020-2021, schools across the state experienced a much lower and uneven participation rate in state assessments. These realities interfere with our state accountability system which requires an analysis of multiple years of comparable data for accountability determinations.

According to the Department, national testing experts have indicated that the 2020-2021 testing data is neither complete nor comparable. As a result, the state does not have testing data necessary to make the multi-year analysis required for valid and meaningful school accountability determinations.

NYSSBA believes in and values the importance of state assessments in providing critical information to parents regarding the academic performance of their children, for teachers to help shape instruction and for school boards and administrators to make informed decisions regarding their district's academic programming and to ensure appropriate resource allocation with the primary goal of supporting students. NYSSBA also supports a transparent accountability system that advances educational equity and promotes school and student success.

However, given the impact on the state assessment data over the course of the last two years, applying the accountability requirements is untenable. Holding schools and school districts accountable under circumstances beyond their control and the use of data that is incomplete and not comparable is inconsistent with and undermines the purpose of the state's accountability system. Therefore, NYSSBA supports a waiver from the accountability requirements for the 2021-2022 school year as the only appropriate and equitable course of action.

We appreciate the opportunity to provide comments on the Department's proposed federal waiver to the state accountability requirements.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Schneider", with a large, sweeping loop at the end.

Robert S. Schneider, CPA, CAE
Executive Director

Andrew Pallotta
President

Jolene T. DiBrango
Executive Vice President

Ronald Gross
Second Vice President

J. Philippe Abraham
Secretary-Treasurer

November 10, 2021

Betty A. Rosa
Commissioner of Education
New York State Education Department
89 Washington Avenue
Albany, New York 12234

Dear Commissioner Rosa:

This letter is in response to the State Education Department (SED) seeking stakeholder input on a potential waiver request to the U.S. Department of Education (USDE) concerning the use of state test results from the 2021-22 school year for school and district accountability determinations under Every Student Succeeds Act (ESSA).

We appreciate the Department's efforts to collect information through the survey and take this opportunity to make NYSUT's position clear.

NYSUT believes that NYSED should neither report the performance of schools on ESSA accountability indicators using results from the 2021-22 school year nor use the results to make accountability determinations. We support a waiver request to accomplish these goals.

NYSUT does not support reporting 2021-22 performance on ESSA accountability measures or using those results to make any accountability determinations. We had great hopes for some return to normalcy for the 2021-22 school year. Unfortunately, we have heard throughout our state in multiple venues, there is significant and continued disruption that COVID-19 has caused to the educational system. Adding to that is the toll of the pandemic on the social and emotional wellbeing of students and staff. The effects of the pandemic continue to be felt across the state and they are often felt unevenly from community to community and from student to student.

Health and safety concerns are abundant, and significant staffing shortages across the state are having a real impact on the learning environment. There has been a dramatic increase in incidents of school violence. Many of our most vulnerable students are not getting the support they need. Additional resources are helpful, but in many communities there is no one to hire. These issues have prevented an equitable learning environment for our students.

As was stated by members of the Committee of Practitioners (COPS) at the October meeting, an overemphasis on assessments is not helpful. We need to focus on local assessments that inform instruction and help us move students forward. The Standardized tests required by ESSA would significantly add stress to an environment that is already overburdened with mental health issues arising at both the student and staff levels.

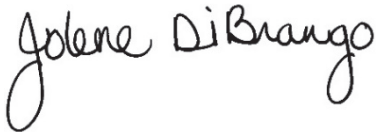
NYSUT supports and encourages NYSED to request a waiver to not identify schools using the 2021-22 test data and related accountability measures. However, we do support providing opportunities for schools to exit CSI/TSI accountability status. We would recommend NYSED consider establishing internal performance goals whereby schools can demonstrate demonstrable improvement thus allowing schools to exit TSI or CSI status.

We understand and appreciate the difficulties in restarting the accountability system. When New York State's plan was approved, no one anticipated a pandemic that would so thoroughly disrupt the education system. However, this is where we are. We have grave concerns about using any assessment data from the 2021-22 school year to make accountability determinations. NYSUT unequivocally opposes the use of assessment data from both 2020-21 and 2021-22 in calculating a building level growth score or for long-term progress goals. Chronic absenteeism measures are also distorted across the state by quarantines and device/internet connectivity issues.

It is NYSUT's position that disentangling the cumulative and uneven effects of the pandemic to determine school performance is impossible to do. As such, the use of 2020-21 or 2021-22 test data will undermine confidence in the validity and reliability of the State's accountability system. We must begin with strong baseline data in 2022-23 and go forward from there.

Thank you for engaging the field and stakeholders to obtain feedback on this important matter.

Sincerely,

A handwritten signature in black ink that reads "Jolene DiBrango". The signature is fluid and cursive, with the first name "Jolene" and last name "DiBrango" clearly legible.

Jolene T. DiBrango
Executive Vice President

cc: Jason Harmon, Assistant Commissioner for the Office of Accountability

Andrew Pallotta
President

Jolene T. DiBrango
Executive Vice President

Ronald Gross
Second Vice President

J. Philippe Abraham
Secretary-Treasurer

December 7, 2021

Betty A. Rosa
Commissioner of Education
New York State Education Department
89 Washington Avenue
Albany, New York 12234

Dear Commissioner Rosa:

Thank you for the opportunity to provide comments on the proposed Federal Waiver for State Accountability Requirements. NYSUT provided comments on November 10th in response to the Department's efforts to collect information through a survey but welcome this opportunity to provide additional comments and reiterate our support for a waiver request.

We support NYSED's recommendation to return gradually to pre-pandemic accountability practices and to allow schools the time to focus on critical social-emotional learning (SEL). We share the Department's concerns with the disparate impact of the pandemic and the ongoing trauma our schools are facing. NYSUT has shared our concerns with the Department throughout the pandemic. Most recently, at the November Commissioner's Advisory Council (CAC) meeting, NYSUT members shared their concerns about the stress and anxiety our students and staff are experiencing. It was clear from the discussion that this year has not brought the relief that so many desperately hoped for. The return of in person learning has been uneven across districts. As the Commissioner stated, "prior to the pandemic, our poorest communities have been in trauma. The pandemic has brought trauma to more communities and burst the bubble that protected some." Our schools need time to rebuild. We wholeheartedly support allowing schools to use authentic, multiple local measures to gauge student progress and to target resources to social-emotional support and services where they are needed most.

We support NYSED's proposal to delay new accountability determinations. The ability of NYSED to make accurate judgements on school performance has been undermined by the pandemic. The state's accountability system requires multiple years of data to identify schools for both comprehensive and targeted improvement. The plan was designed to encourage and reward schools for demonstrating improvement over time. Numerous experts, including those referenced in the draft waiver request, have cautioned against using data from schools effected by the pandemic. NYSUT has stated consistently that we have grave concerns about using any performance data from the 2020-21 year in the state's accountability system. It is NYSUT's position that disentangling the cumulative and uneven effects of the pandemic to determine school performance is impossible to do. NYSED's proposed waiver request indicates these concerns are shared by the department and by consultants who have modeled the data.

In 2019-20, tests were not given. In 2020-21, assessments were shorter, and are not comparable to previous years.

The state growth model used in the state accountability system requires not only data from the previous year but to provide stability, the two proceeding years as well.

The participation rate was very low for the 2020-21 assessments. Only 40% of eligible students took the state tests and it was uneven by grade/subgroup/school. Participation was determined by whether students were learning remotely or by how comfortable parents were with their child taking the tests, as was allowed by the USDE waiver from the 95% participation rate. It is not possible to determine whether those students who did take the assessments were representative of the students in the school.

It was understood by the school community and affirmed by the Department during the November 15th presentation to the Board of Regents, that these 2020-21 “assessment results are not representative of the state’s student population; therefore, sub-group, year over year, or other comparisons should not be made”.

With the assessment data from 2020-21 compromised, to have any baseline, NYSED would need to go back to 2018-19. Using data from pre-pandemic years, would create a baseline that has little to do with current reality. This would undermine any confidence that the state’s accountability system is fair or valid. We appreciate the extensive modeling conducted by NYSED, which confirms our view and experience with districts across the state.

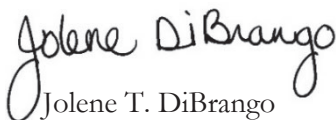
The alternative, which was considered by NYSED, is to create an accountability list using only the 2021-22 assessment data. This would require submitting a new ESSA plan to USDE and abandoning New York State’s Board of Regents’ policies. NYSUT agrees with the Department’s objection to using this approach.

The state’s accountability system identifies schools using ranking systems. All of New York’s schools were impacted by the pandemic, but not all equally. Limiting accountability to single-year achievement measures will unfairly punish schools where communities have been hit hardest by the pandemic. Using multiple years of data allows schools to demonstrate progress from the beginning of the pandemic, providing a more well-rounded assessment of student progress and achievement.

Many of the ESSA indicators require more than one year of data, such as the progress measures and the Growth model. The Board of Regents made a commitment to using growth and progress as critical factors in the accountability system to recognize and reward the hard work that schools and communities are doing to improve student outcomes. Without this, the state reverts to the measure and punish approach that was institutionalized by NCLB. Experience has taught us that was not an effective strategy for school improvement. With our schools in crisis, reeling from the effects of the pandemic, this is not the time to re-introduce punitive measures for struggling schools.

Thank you for engaging the field and stakeholders to obtain feedback on this important matter.

Sincerely,



Jolene T. DiBrango
Executive Vice President

cc: James Baldwin, Senior Deputy Commissioner for Education Policy
Jason Harmon, Assistant Commissioner Office of Accountability

December 15, 2021:

Dear Members of the New York State Education Department (NYSED):

We are pleased to respond to your request for public comment on NYSED's federal waiver request for the 2021-22 School Year. We appreciate that NYSED believes the waiver is needed to protect schools' eligibility to apply to Title I School Improvement Grant Funds, and we support the timely and effective use of these funds in schools. We believe NYSED must take additional steps to advance educational equity in concert with its waiver application.

The Opportunity Institute is a nonprofit organization that focuses broadly on educational opportunities, beginning with infant and toddler development and continuing to Pre-K through grade 12 schooling, higher education completion, and into early career and family support. We focus on work that cuts across issue silos to address the complex barriers to social and economic mobility at critical junctures in people's lives. In New York, we work with the Alliance for Quality Education and Citizen Action to advance more equitable practices and policies in schools, districts, and statewide.

The Whole Child Equity project at the Opportunity Institute seeks to apply recent advances in child development and brain sciences to improve the overall well-being of children and families and to improve educational outcomes — social, emotional, and academic — for children who experience racial and economic disparities. These are the students most vulnerable to the failures of schools and the “adjacent” child-serving agencies on which they depend. With new knowledge about science of learning and development and evidence-based practices, we believe public policy can take the transformation of education and adjacent systems to scale and improve the lives of many more people.

In this letter, we address each of the outcomes you identified as resulting from the granting of a federal waiver:

1. NYSED will not use 2021-22 school year data to identify or remove schools from identification as Comprehensive Support and Improvement Schools and Targeted Support and Improvement Schools
2. NYSED will not assign accountability levels to schools or subgroups of students on each of New York's accountability indicators;
3. NYSED will provide schools that are at risk of identification as Targeted Support and Improvement Schools based on their 2018-19 school year performance the opportunity to apply for Title I School Improvement Grant Funds.

Not Using 2021-22 School Year Data to Identify or Remove Schools from Identification as Comprehensive Support and Improvement Schools and Targeted Support and Improvement Schools

Given the uncertainty and mixed nature of public school pedagogy during the ongoing COVID-19 pandemic, we agree that 2021-22 school year data should not be used to guide the identification or removal of schools as Comprehensive Support and Improvement Schools and Targeted Support and Improvement Schools. With that said, NYSED should use the opportunity presented by a potential federal waiver to advance better and more nuanced ways of measuring student learning.

Last year, in preparation for the initial reopening of schools across New York state, the Opportunity Institute worked closely with the Alliance for Quality Education and the Public Policy Education Fund on “A Roadmap to a Just Reopening & Just Schools,”¹ a report that offered a community-centered vision for New York’s public schools post-COVID-19. That report noted that leading scientists and researchers from multidisciplinary fields are converging a great deal around how children develop, how they learn, and how their environment either nourishes or limits the expression of their fullest potential. The basic idea of “whole child” education – that the success of the system is tied to the full array of students’ learning and developmental needs – is uncontroversial. The concept is widely accepted in education and other fields, backed by ample research, and supported by simple common sense. In fact, families and caregivers have been saying this for years.

The report also noted that we need to affirmatively advance educational equity and improve outcomes for all children. Knowing that what we had in place prior to the pandemic was not working for many children, we must do better than simply re-create pre-existing systems, practices, and policies. Acknowledging also that we are still in an unfolding public health emergency, engagement with school communities must be ongoing and accompanied by ongoing refinements to practices and policies.

While we agree that NYSED should not use 2021-22 school year data to identify or remove schools from identification as Comprehensive Support and Improvement Schools and Targeted Support and Improvement Schools, we believe NYSED must do more to more thoroughly support schools in need of improvement.

NYSED should go beyond the terms of its waiver request and take affirmative steps to help educational leaders and key staff in identified schools undertake activities to support accelerated student learning such as:

¹ https://www.aqeny.org/wp-content/uploads/2020/07/roadmap_FINAL-2.pdf

- Mapping the curriculum into big, coherent ideas, like, for example, number sense, data literacy in math;
- Engaging students with real and relevant data and encouraging them to explore their options;
- Creating rich, deep activities to support learning in mathematics;
- Using professional learning communities (PLCs) and teacher planning time to address both the horizontal and vertical alignments of curriculum.

Assigning Accountability Levels to Schools or Subgroups of Students on Each of New York’s Accountability Indicators

One of the guiding principles for New York’s reopening guidance for schools is quite strong: “We will proceed with the understanding that planning for schools to reopen is not a one-time event. We will continuously monitor the situation and provide updated guidance, policies, and regulatory changes as the situation requires.”² Given the racial and socioeconomic diversity of New York’s public school students, the disaggregation of student data is critical to the fulfillment of this promise, and must be supported by more specific and targeted support for schools. For example, school district reopening plans do address funds for identified groups, but without fully established metrics and guidance for the work with these groups of students, progress is likely to be uneven and inequitably distributed.

We recommend that New York state place greater emphasis on the flexibility that districts and schools have to review, revise, and continually improve plans to meet the ongoing challenges faced by school communities. Reinforcing that the contents of the plans are not fixed will help to encourage more robust community engagement in spending, implementation, and refinement of efforts. But this, alone, will be insufficient. It is important to help the community have a full picture of what it takes to address the holistic needs of each student. To do so, the state should provide guidance and supportive protocols that are based on developmental science, equity, and what supports are needed in a school to help each student learn and thrive. This way, everyone can arrive at the best strategies and opportunities worthy of funding.

Eligibility for Title I School Improvement Grant Funds for Schools at risk of identification as Targeted Support and Improvement Schools based on their 2018-19 School Year

Yes, protecting these schools’ eligibility for enhanced federal funding is important. NYSED must also do more to support the effective and efficient use of funds to meet already identified areas of need. The Alliance for Quality Education and the Public Policy and Education Fund recently conducted a survey of more than 1,000 community members in New York City, Buffalo, Rochester, Kingston, Utica, and Albany. Survey respondents identified mental health support as one of their top priorities for the use

² <http://www.nysed.gov/common/nysed/files/programs/reopening-schools/nys-p12-school-reopening-guidance.pdf>

of investments in education.³ Many schools and districts did not have adequate numbers of nurses, social workers or psychologists before the pandemic, and these disparities have grown over the past 18 months. Clear and concrete expectations from the state regarding approaches to staffing and improvement would help districts and schools collaborate more effectively with their communities around effective and sustainable responses to these kinds of local priorities. Considering the vast differences in local capacity across and among school districts, the absence of these supports is a perfect recipe for the uneven and inequitable use of state and federal investments in education.

To date, the actual use of state and federal funds to meet the specific needs of students has been uneven. And this is to be expected. For example, while there is statewide guidance on social and emotional learning, there are no clearly articulated, concrete expectations from the state regarding implementation and no system of improvement in place to support local efforts to align educational practices with what we know about learning and development from scientific principles.

The lack of social and emotional learning assessments and the uneven consideration of social and emotional factors in back-to-school plans have actively hindered the ability of districts and schools to provide SEL programming and related supports. New York needs a social emotional plan for every district, but these plans must be accompanied by a robust set of expectations, strategies, programming, along with assessments to drive SEL learning and well-being across the state.

Guidance on teaching and learning and social-emotional well-being are both found in the state's guidance on school reopening, but they are not well-connected to outcomes. There is evidence that for teaching and learning to be successful, educators must prioritize social and emotional well-being as part of the education program. Students must feel a sense of safety both physically and emotionally and must be able to deal with their feelings and have space and time to express themselves with adults and with their peers. Our students need guidance and parameters but most importantly, they need strong positive relationships and a nurturing environment as they learn to navigate the changes they are undergoing. Teachers who are especially responsible for student academic success need the assurance and guidance that in-school and class time can and should be used to address the stress and traumatic experiences that students are dealing with due to various disruptions related to COVID-19: family illness and death; economic uncertainty in homes; food and housing insecurity caused by parents' need to stop working and care for young children or their need to make unstable working arrangements so they can teach and support their children in virtual learning.

³ Additional survey details can be found in the Alliance for Quality Education's report, "[We Demand: How New York's Communities Want To Use New Federal Aid to Public Schools.](#)"

Going Forward

The state must provide guidance and support schools in implementing a strong culturally affirming SEL program, integrated with a rigorous academic curriculum, that meets the needs of every student. The role of SEL assessments will be critical to determining impact. SEL assessment expert Clark McKown notes that while there are challenges in assessing SEL, there are also some emerging best practices and models for what states could be doing around social and emotional support. At a minimum, NYSED can help school districts by identifying specific, practical, and cost-effective measures that identify students' SEL needs and strengths and help schools identify their own programmatic needs.

In terms of tools to assess outcomes, the Caring School Community program, a CASEL SElect program for K-8, provides an Individual Student Assessment that is designed to assess and track how each student is learning and applying the social skills taught in the program over time. It also provides tools for informal "Class Assessments" that can be used to observe and assess how students are interacting with each other throughout the day and monitor and track skills development and progress. The program also provides a set of school climate surveys and questionnaires for students, teachers, support staff, and parents to be administered at least once per year.

While NYSED has established three goals to inform development of a benchmarking system for SEL, the guidance document states that "these goals are further explained, with associated benchmarks provided for **voluntary use** at the early elementary (K-3), late elementary (4-5), middle school (6-8), early high school (9-10), and late high school (11-12) levels" (emphasis added). That this approach is voluntary – and unaccompanied by actual state assessments, assessment strategies, or even specifically designated funding – virtually guarantees that the highest-needs districts and communities will not be among the leaders in this space.

Conclusion

In summary, large investments from the state and the federal government in public education require more careful and intentional guidance from NYSED to be effective and result in measurable outcomes. To date, many of the plans released by school districts have been vague, particularly regarding how and when new programming will be implemented and the number or percentage of students that will benefit from proposed programs. Even beyond the state accountability system, parents and advocates still have many unanswered questions regarding the current and future use of state and federal investments in education. Clearer expectations and more active oversight are necessary to support the well-being of students and the timely provision of academic supports.

We also note that many districts have not yet indicated how they will measure success going forward. On a longer-term basis, we note the need to improve the evidence available to policymakers and the public at all levels through the creation of better, more durable indicator systems to monitor equity. In the

meantime, the state has a key role in requiring districts to track and measure their progress, particularly regarding their prioritization of the needs of the most vulnerable students.

Equity and racial justice must be central to efforts to ensure that schools do not return to old ways that did not work for too many of our children.

We thank you for the opportunity to submit these comments, and we would be happy to offer additional information as helpful.

Sincerely,



Winsome Waite



Guy Johnson

From: [Patricia O'Connor](#)
To: [ESSAComments](#)
Subject: Proposed Waiver
Date: Thursday, December 9, 2021 2:10:14 PM

To Whom it May Concern,

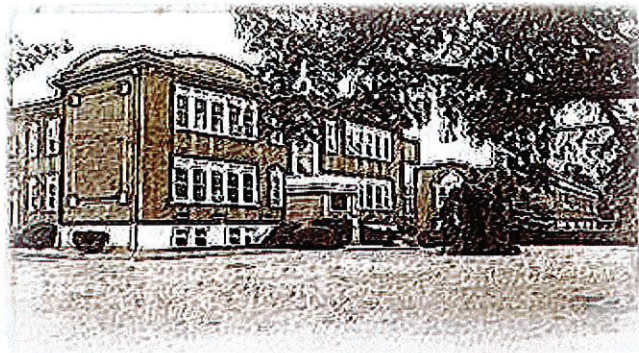
I strongly support the proposed NYSED waiver that requests:

- 2021-22 school year data not to be used to identify or remove schools from identification as Comprehensive Support and Improvement Schools and Targeted Support and Improvement Schools;
- Accountability levels not assign to schools or subgroups of students on each of New York's accountability indicators;
- Provide schools that are at risk of identification as Targeted Support and Improvement Schools based on their 2018-19 school year performance the opportunity to apply for Title I School Improvement Grant Funds.

Thank you for your consideration.

Patricia O'Connor
10 Deer Pond Drive
Warwick, NY 10990

SHELTER ISLAND UNION FREE SCHOOL DISTRICT



SUPERINTENDENT/PRINCIPAL, *Brian Doelger, Ed.D.*

DIRECTOR OF PUPIL PERSONNEL, DATA AND INSTRUCTION, *Jennifer Rylott*

DIRECTOR OF ATHLETICS, PHYSICAL EDUCATION,

HEALTH, WELLNESS & PERSONNEL, *Todd Gulluscio*

DISTRICT CLERK, *Jacqueline Dunning*

DISTRICT TREASURER, *Deborah Vecchio*

BOARD OF EDUCATION

Margaret Colligan, President *Katherine Rossi-Snook, Vice President*

Dawn Hedberg *Kathleen M. Lynch* *Tracy McCarthy*

Karina Montalvo *Robert Strauss*

Dr. Lester W. Young, Jr., Chancellor
Dr. Betty A. Rosa, Commissioner of Education
Mr. Roger Tilles, Regent, 10th Judicial District

14 December 2021

Dear Dr. Young, Dr. Rosa, and Mr. Tilles,


Thank you for all that you do for education and students in our state – especially in these trying times of the pandemic. You have provided steady and much appreciated leadership. We in the field certainly feel it.


We are writing to oppose the accountability waiver request that the New York State Education Department is seeking from the federal government. Our district was designated a Target District in the 2019-2020 school year. While our district received this designation, our school did not. They are both the same group of students. The data used to designate our district that is still keeping us on this list goes back to 2017. This is because our district is so small that data had to be combined (while it did not for 99% of other districts). I vehemently objected to the designation but lost. We were essentially put on this list due to high opt out rates.


We have worked diligently as a school to improve our testing rates, scores, and growth rates on both ELA and Math. We have seen significant improvement in the middle of a pandemic, yet due to this proposed waiver, we will be punished unfairly again for another year. This is demoralizing to the district and is unjust.

While we are certainly in favor of no new schools or districts receiving a designation this upcoming school year, we implore you to please find a way for schools and districts that performed well and showed great growth to come off of the list.

Thank you for your consideration in this matter,


Brian Doelger, Ed.D.
Superintendent


Margaret Colligan
Board of Education, President


Mary Kanarvogel
Shelter Island Faculty Assoc., President



December 15, 2021

Statement in Response to NYSED's Testing Waiver Proposal

Dear Commissioner Rosa, Chancellor Young, and Secretary Cardona,

Our grassroots coalition of families and educators, NYC Opt Out, writes to support New York State Education Department (NYSED) in its request to be waived from certain ESSA obligations for spring 2022. **However, the state's draft waiver request falls far short of what it should be asking. The primary and significant shortcoming of this draft is that the state has not asked to be waived from the requirement of having to administer the tests, period.** In last year's waiver request the state asked that the US Department of Education (ED) completely waive the annual grades 3-8 requirement and partially waive the NYSESLAT testing requirement for learners of English as a New Language. (This year's waiver request does not even mention NYSESLAT.) While we applaud the state asking to be relieved from having to identify new CSI and TSI schools based on data from 2021-22, we find it unacceptable that it once again fails to ask ED for a non-test-score or test-participation based off-ramp for schools who wish to exit the CSI or TSI designation. As one parent put it:

My child's school was placed on this [CSI] list because over 75% of the students refused to participate in state testing in 2019, as is their right. The school has been stuck on this list since then because of cancelled state tests in 2020 and essentially no testing in 2021. It is absurd to evaluate schools on these senseless tests. And it is even more absurd to put a highly functional school on one of these lists based on extremely limited testing and then create no path for that school to ever be removed from the list. The burdens placed on our school are immoral and detracting from the important work going on in our classrooms. The charade of Participation Improvement Plans, which essentially force schools to coerce children into participating in testing, needs to be stopped immediately. It is essential that NYSED

request a waiver from both identifying new schools to be placed on the TSI or CSI lists and that NYSED immediately release all schools currently trapped in that status. ENOUGH!

The case NYSED makes to ED for being waived from having to identify new schools or districts for accountability labels could just as easily be made for why it should be asking to be waived from test administration entirely. After all, we remain in pandemic, with classrooms or whole schools closing temporarily and students and staff being periodically quarantined, or worse, falling seriously ill themselves or having family members who are seriously impacted by COVID, whether that manifests economically, or in the direst of instances, in long-term illness or even death. (Just between 9/13/2021 and now, in New York City alone, over 12,000 classrooms have been fully or partially closed. Source: <https://www.schools.nyc.gov/school-life/health-and-wellness/covid-information/daily-covid-case-map>)

Quoting the Center for School and Student Progress, NYSED includes the following in its draft request:

As daily life increasingly returns to ‘normal,’ we must confront what this means in the context of education...next year [2021-22] cannot be a ‘normal’ year. We cannot return to the classroom and do things the same as they have always been done and expect to see a different outcome. Instead, we must use this critical moment in education to radically rethink how programs, policies, and opportunities are designed and fiercely commit to prioritizing the communities most impacted by the pandemic and distributing resources accordingly.
(<https://www.nwea.org/content/uploads/2021/07/Learning-during-COVID-19-Reading-and-math-achievement-in-the-2020-2021-school-year.research-brief-1.pdf>)

The state goes on to say, this time in its own words (emphasis ours):

Restarting the accountability system prematurely based on 2021-22 school year results will hinder, if not preclude that much-needed rethinking. During numerous conversations with stakeholders across New York State, district leaders, *school leaders and classroom teachers have noted feeling compelled to divert their attention*

away from engaging in critical social-emotional learning (SEL) work to focus on ELA and math assessment preparation more narrowly, which may, in the longer term, reduce student achievement and growth. At the local level, waiving the requirements in ESSA Sections 1111(c)(4) and 1111(d)(2)(C)-(D) for the 2021-22 school year will allow all school communities with needed flexibilities to *identify student needs using more reliable measures of growth and progress during pandemic-impacted years and to intensify the socio-emotional development supports, services, and opportunities that students need to achieve academic growth* and, while still maintaining high expectations for achievement. (<http://www.nysed.gov/common/nysed/files/2021-22-accountability-waiver-letter-draft-120121-public-posting.pdf> p.12)

It is difficult to conclude that giving the tests will help “intensify socio-emotional development supports, services, and opportunities” students need; rather, it’s more likely that their administration will simply detract from the time teachers and schools can devote towards these ends. And it’s absolutely wishful thinking to believe that, if the tests are given, schools won’t be “narrowly focused” on test preparation, especially as the state asks to be excused from using 2021-2022 data to identify new TSI or CSI schools *this year*, but does not ask to be waived from using this year’s data from providing a growth baseline to be used *in coming years*.

In its draft waiver request, the state makes a promising start, recognizing the importance of its Diversity, Equity, and Inclusion framework in promoting student achievement, and even going so far as to say that “discussions of New York’s ‘achievement gap’ can be misinterpreted if we fail to account for the lack of student *opportunities to learn*.” (<http://www.nysed.gov/common/nysed/files/2021-22-accountability-waiver-letter-draft-120121-public-posting.pdf> p.2)

The families and educators of NYC Opt Out have been saying a variation of this for years, and it is why many of us have refused to have our children participate in a system that has not only failed to account for these inequities, but actively perpetuates them.

In summary, we implore NYSED, when advocating for our children with ED, to ask for more than crumbs. In addition to being waived from the accountability provisions in the current draft, we ask you to expand your request to ask for:

- **a waiver from having to administer any federally-mandated tests (grade 3-8 math and ELA, the NYSESLAT, etc)**
- **an off-ramp that does not rely on test scores or test participation for schools who wish to exit from accountability designations (TSI, CSI, etc)**
- **a request that if New York State is irrationally forced to administer tests, despite the ongoing stresses of the pandemic, that the 95% participation rule be eliminated**

As rationale, you have your own statement, with which we wholeheartedly agree:

Throughout New York State, educators and students are still facing significant challenges and struggles in seeking a return to normalcy. Those stressors are manifest in reports of widespread student behavioral issues, increased need for mental health and academic interventions and difficulties in recruiting and retaining school personnel. It is critical that the Department mitigate rather than exacerbate stress on fragile communities that need time to recover and heal from the pandemic. (<http://www.nysed.gov/common/nysed/files/2021-22-accountability-waiver-letter-draft-120121-public-posting.pdf> p.11)



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KEVIN S. CASEY

Executive Director

November 17, 2021

Dr. Betty A. Rosa, Commissioner
NYS Department of Education
89 Washington Avenue
Albany, New York 12234

Dear Commissioner Rosa:

Thank you for initiating a process for soliciting the opinions of stakeholders on the NYS accountability system and a potential request for an associated waiver to the USDE. On behalf of our members, the School Administrators Association of New York State, I would like to submit the following representation of member opinions on this issue.

Our members strongly support the submission of a waiver request to the USDE that would obviate the use of ESSA performance indicators for reporting school performance, for determining district/school accountability status and allowing districts to exit TSI or CSI states upon demonstrated improvement. We would further request that the NYSED expand the waiver to include the discontinuation of the 3-8 assessments and Regent exams required of the NYS accountability plan. Responses from our members expressed incredulity at the prospect of requiring the administration of the exams for the 2021-22 school year and subsequently any use of them for accountability purposes.

The reactions by our members are based on difficult and challenging environments in schools. Administrators continue to deal with multiple daily crises in their schools. As committed and dedicated as building administrators are, there is now a point where it feels overwhelming. Comments from our members regarding the waiver reflect their thinking that the accountability measures and assessments are now punitive in nature and ignore the reality of a diminished instructional program. Most of our schools are still dealing with pandemic related challenges and yet are expected to operate schools as "normal". They are overwhelmingly of the opinion that removing the weight of accountability would be a "humane" action.

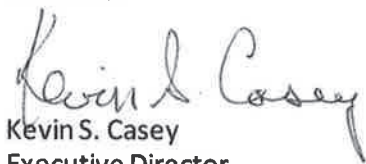
Aside from disheartened school environments, members also provided some very practical reasons to suspend assessments and use of data for accountability purposes:

- Measuring growth, which was basis of the accountability formulations, is no longer sound with two years of data either being unavailable or depressed.
- Due to staff shortages (requiring an inordinate number of substitute teachers), delayed school starting times due to transportation runs being cancelled and quarantine requirements, instruction has not been consistent. The 2021-22 school year, although in-person, is not representative of the consistent and robust instructional programs in years prior to the pandemic.

- Due to the less-than-optimal nature of remote instruction, teachers are finding it necessary to provide considerable amounts of re-teaching. The state assessments as developed, only evaluate specific grade level skills and standards. The state assessments as designed do not dip into prior year material. Educators cannot be held accountable for pandemic learning loss which would be reflected in student performance on the state 3-8 assessments if administered this spring.
- As a last issue related to the accountability system, APPR should also be discontinued, and this decision must be made earlier in the year. The inordinate amount of work placed on building administrators for APPR is massive, and only to have it suspended last year well towards the end of the school year was very disconcerting. Decisions to suspend APPR should be made again this year and as quickly as possible.

Our members feel that this is a pivotal moment in education and to continue to use irrelevant accountability measures lacks intentionality and purpose. We know that the NYSED and the Board of Regents have attempted to traverse the complex nature of the federal mandates and we appreciate your efforts. We will continue to work with our Congressional delegation and state legislators on these issues to alleviate the stress on educators, parents and students and examine more responsive strategies.

Sincerely,



Kevin S. Casey
Executive Director

cc: Kimberly Wilkins
Deputy Commissioner, P-12



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Latham, New York 12110

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KEVIN S. CASEY

Executive Director

December 13, 2021

Commissioner Betty Rosa
New York State Education Department
89 Washington Avenue
Albany, New York 12234

Dear Commissioner Rosa:

On behalf of our members, SAANYS would like to express our appreciation for the extensive outreach to stakeholders regarding the proposed submission of an application for a waiver from certain accountability requirements stipulated in the Every Student Succeed Act (ESSA). SAANYS provided our initial response to a possible waiver request on November 17, 2021 and have had continued conversations on this subject with our membership. Additionally, we have met with you and senior staff several times, as well as continued our participation on standing committees, such as Title I Committee on Practitioners. SAANYS supports NYSED's submission of a waiver application to the USDE, however our members continue to be very concerned about the need to implement strict accountability interventions during the pandemic as required by the accountability system. The multiple and complex components of the accountability system seem unconstructive, in light with the many challenges that students, staff, and families face in a daily basis.

SAANYS has been involved in the development of the accountability system from its inception. The design of the accountability system has many components, all intended to provide data on student growth, and achievement, using various measures such as interim progress goals and performance and composite levels. A cornerstone of many of the formulas relies on student participation on state assessments and enrollment. The accountability system was designed in the context of a body of research that focused heavily on growth models and vast data sets. Over time, the context in which this system was built has changed politically, in practice, and through exogenous factors such as the global pandemic. Elements of the formulas used in the accountability system, such as student enrollment and participation have been impacted by shifting instructional models, remote instruction and decreased student attendance. Researchers cited in the NYSED waiver application and reports such as the McKinsey July, 2021 report, question the use of growth models in light of missing data or data that cannot be compared with prior years.


NYSED also recognizes these challenges and has done an excellent job in providing a sound justification for its proposal to request a waiver from reporting and using data to identify school performance until the 2022-2023 school year. The modeling techniques and the justifications as to why using data from years prior to the pandemic, or data from the 2019-20 and 2020-21 school years would

not provide a sound or fair or balanced accountability system are most valid. The Department convincingly demonstrates how missing data, varying test formats, and decreased student participation would not provide comparable results or meaningful data on which to differentiate school or student performance.

SAANYS concurs that in light of the current context, delaying the reporting and identification of schools until the 2022-23 school year is the preferred option. As our schools continue to struggle with the impact of COVID-19 on students, staff and families, SAANYS would also propose that this may be an appropriate time to rethink the various metrics used in the state accountability systems and to continue to delink accountability from professional evaluations. There seems to be an assumption that there will be some stability in data when the accountability system restarts in 2022-2023 school year, however it is also likely that there will be continued challenges to increasing student participation and student performance on the state assessments. It may be beneficial to shift the focus of data analysis from student performance to the impact of the pandemic on learning loss. Comparisons of districts using varying instructional models could provide helpful insights on such models and student need.

Thank you for your commitment to stakeholder involvement. Please feel free to contact us with any questions or need for further information.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kevin S. Casey". The signature is fluid and cursive, with the first name "Kevin" and last name "Casey" clearly distinguishable.

Kevin S. Casey
Executive Director



*Dr. Kriner Cash,
Superintendent*

*Ebony E. Bullock
Chief Accountability Officer*

To: New York State Education Department
From: Ebony E. Bullock, Chief Accountability Officer *EB*
CC: Dr. Kriner Cash, Cabinet and Board Members
Date: December 10, 2021
Re: BPS 2021-2022 SY Accountability Waiver Statement

The New York State 3-8 Assessments in ELA and Mathematics and Regents examinations were fraught with difficulties for the 2020-2021 school year due to the continuing global Covid-19 pandemic. Additionally, the entire Buffalo Public School (BPS) Community continues to be impacted by the ongoing pandemic.

Whereas the New York State Education Department (NYSED) has publicly stated the following:

- We are shifting the way we release data from the Department to a **more support-oriented approach to districts.**
- We want to focus on how this **data should support educators making decisions in the classroom.**
- Due to the circumstances related to the pandemic, approximately **4 out of 10 students participated** in the Spring 2021 Grades 3-8 English Language Arts (ELA) and Mathematics Tests.
- In ELA, 41.9 percent of students enrolled in grades 3-8 took the exam and in math, 39.9 percent of enrolled students took the exam.
- In an ordinary year, the percentage of students who participate in the tests is typically over 80 percent.
- Therefore, this past school year's **performance results are not representative of the state's student population and should not be compared** to that of previous school years, statewide or among subgroups of students.

Office of Shared Accountability

School #4- 425 South Park Ave., Room 220, Buffalo, New York 14204

Phone: 716.816.4684 ♦ Fax: 716.878.9719

Putting children and families first to ensure high academic achievement for all

- Because only 40% of students' results are available, **state assessments are not representative of the state's student population** and it would be **irresponsible to release data at a statewide level**, so we are not releasing any statewide performance results this year.
- Due to the percentage of students who took the tests, **we caution against making any comparisons at the local level** and **do not recommend highlighting any gains from previous years**.
- We will note there is **value in statewide assessment as one of multiple measures of assessing student learning** to assist in developing better supports for them and testing in 2022 will return to the two-session format.

Further, whereas, due to circumstances related to the pandemic the BPS Spring 2021 ELA and Math assessments, results were as follows:

- Approximately **17.6%** (2,490 BPS students out of 14,132) participated in the Spring 2021 Grades 3-8 English Language Arts (ELA) assessments.
- Approximately **19.4%** (2,746 BPS students out of 14,126) participated in the 3-8 Mathematics assessments.
- In an ordinary year, well over 90 percent of BPS students participate in the grades 3-8 ELA and Math assessments.

Therefore, as the second largest school district in New York State, and understanding the deleterious effect that strict adherence to the previous accountability protocols will have on BPS schools, BPS strongly encourages the following from both the USDOE and NYSED:

- Eliminate any accountability and school identification requirements for school districts and schools for improvement in fall 2022 based on 2021-2022 results. This includes but is not limited to any funding penalties related to districts failing to meet accountability requirements.
- BPS schools in "Good Standing" that were previously identified as at risk of becoming identified as Target Support and Intervention Schools prior to the pandemic but were not due to pandemic related disruptions to the accountability system be allowed to use Title 1 Improvement funds to support their improvement strategies.

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Public Comment On NYSED's Federal Accountability Waiver Request for the 2021-22 School Year

The New York State Education Department (NYSED or "The Department") is accepting public comment on a proposed request to the United States Department of Education (USDE) seeking a waiver to not make accountability determinations and school improvement identifications using data from the 2021-22 school year and to provide flexibility in the use of Title I School Improvement Funds. **NYSED is accepting public comment through 5:00 PM EST on Wednesday, December 15, 2021.** Questions regarding the draft waiver can be sent to: essacommments@nysed.gov

If the proposed waiver is granted, New York will:

-
-
-

A full text of the waiver can be found here: www.nysed.gov/essa/assessment-and-accountability-waivers

Please note that all questions below are optional.

1. **Michael**

First Name

2. **Kohlhagen**

Last Name

3.

Please indicate which of the following stakeholder groups best describes you as it relates to your public comment.

I am a/an:

Assistant Superintendent

Business Leader

Community Based Organization Leader/Representative

District Personnel

Parent

School Administrator

School Staff

Student

Superintendent

Teacher

Union Leader/Representative

Other

4.

What is the name of the organization, if any, with which you are associated with (e.g., school name, community organization)?

Center for Educational Innovation (CEI)

5. To what degree do you support NYSED's proposed waiver request?

Strongly Support

Support

Neither Support nor Oppose

Oppose

Strongly Oppose

Don't Know/No Opinion

6.

Please input below any comments you wish to be considered. If you have a letter from your organization that you would like to attach to this public comment, please email to: essacommments@nysed.gov

The Center for Education Innovation (CEI) is a nonprofit organization that is a recognized leader in advancing meaningful reforms in public education. CEI's mission is to make the school the center and driving force of public education reform and innovation. We work directly with district and charter school teachers, school leaders, and the community to create the schools their children need to succeed. Every child deserves a quality education.

CEI supports the New York State Education Department (NYSED) Federal Accountability Waiver Request for the 2021-22 School Year. School year 2022-23 data should be used to reset the New York accountability system. CEI partners with NYSED to support struggling schools, including through independent receivership and other support needed for district and charter schools. We look forward to continuing to help students succeed across New York State.

CEI appreciates the public engagement by NYSED on this waiver request, and we are happy to discuss further. Please feel free to [contact us](#).