



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

Commissioner of Education  
President of the University of the State of New York  
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Albany, New York 12234

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February 12, 2021

Hon. Philip H. Rosenfelt  
Acting 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 Assessments and Accountability

Dear Acting Secretary Rosenfelt:

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) two requests for waivers from certain provisions of the Every Student Succeeds Act (ESSA). Enclosed with this letter is detailed information and evidence regarding the need for these waivers in order for New York to address the unprecedented circumstances caused by the ongoing COVID pandemic and how granting of these waivers will contribute to student achievement. These waiver requests are 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 these waiver requests, we respectfully seek an expedited review and decision by the USDE in regard to the enclosed assessment and accountability waiver requests. As students, families, and school communities continue to cope with the ongoing effects of the pandemic, we eagerly await your positive response to these requests.

Sincerely,

Betty A. Rosa  
Commissioner

Enclosures

c: Kimberly Wilkins  
Jason Harmon

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

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

Dear Acting Secretary Rosenfelt:

Section 8401 of the Elementary and Secondary Education Act (ESEA), as recently 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 assessment requirements in section 1111(b)(2) for the 2020-21 school year 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 across the State and a review of the impact of the ongoing COVID-19 pandemic. The Department is requesting that LEAs in New York State be granted a waiver of the identified sections for the 2020-21 school year. Below is a detailed plan that addresses each requirement in Section 8401(b)(1) of ESEA/ESSA.

NYSED is requesting this waiver because we have determined the spring 2021 State assessments cannot be safely, equitably and fairly administered to all students across the State given how severely the pandemic has impacted the delivery of instruction to students and adversely affected their social and emotional well-being.

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

Assessment requirements in section 1111(b)(2): the requirements to administer all required assessments in school year 2020-21.

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

The New York State Education Department requests a waiver for the following statutory requirements:

Section 1111(b)(2): Each state must implement a set of high-quality student academic assessments in mathematics, reading or language arts, and science. In the case of mathematics and reading or language arts, these assessments must be administered in each of grades 3 through 8 and at least once in grades 9 through 12. In the case of science, these assessments must be administered not less than one time each during grades 3 through 5; grades 6 through 9; and grades 10 through 12.

***Rationale for Waiver Request:***

Pursuant to Executive Order 202.4 from New York State Governor Andrew Cuomo, school districts, charter schools, and nonpublic schools were directed to close no later than Wednesday, March 18, 2020, as a result of the outbreak of the Novel Coronavirus (COVID-19) occurring in New York State. As the 2020-21 school year has progressed, LEAs have had to make frequent and often rapid adjustments in the manner that students have been attending school and receiving instruction. This includes schools that have yet to open for in-person instruction as of this writing. The direct result of the ongoing pandemic is that a large portion of our State's student population has been receiving all or nearly all of their schooling remotely through virtual learning. The manner in which instruction has been delivered has varied greatly across districts and schools. The ongoing and at times rapidly worsening COVID-19 pandemic has also caused enormous economic and emotional insecurity for our students and their families and made the task of safely educating our students immensely more challenging.

Among numerous measures that demonstrate the uneven effects of the pandemic on students and their academic achievement and growth, the manner in which schools across the State have provided instruction in the 2020-21 school year is particularly clear. A September 2020 survey of instructional models issued by the Department revealed that nearly 63% of schools planned to start the school year providing hybrid instruction, compared to 20% that planned to provide full in-person instruction and 17% of schools that would provide remote only teaching and learning. While the rate of schools planning remote only learning was the lowest of the three models, those schools providing remote only instruction tended to be located in urban settings and were more likely to serve communities with higher concentrations of students from racial and ethnic subgroups. Students attending schools in four of the five largest districts in the State began the year in remote only teaching and learning. Many of those same schools have yet to open for in-person instruction as of the time of this waiver submission.

In districts that provided families the opportunity to choose between in-person and remote instruction models, data collected by the Department indicate that students of color were more likely to select remote instruction compared to their White peers and are more

likely to continue in remote learning once in-person options are made available. For example, according to New York City Department of Education's October 9, 2020 Learning Preferences Survey, 52% of students – totaling more than 500,000 students – selected remote instruction over blended or in-person options. The same survey data revealed significant differences between racial groups. The families of 43% of Black students and 41% of White students selected remote-only learning, whereas more than 75% of the families of Asian students and about half of the city's Hispanic students selected remote-only learning.

In view of what has transpired, we have determined that the Spring 2021 State assessments cannot be safely, equitably and fairly administered to students in schools across the State. Additionally, we believe that school instructional time would be best focused on supporting students in academics as well as social-emotional health rather than attempting to administer assessments to the limited population of students that are receiving in-person instruction.

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

Waiving the requirement to administer assessments will allow schools the necessary flexibility to attend to students' social-emotional health and focus on teaching and learning and community needs during a time when instructional modalities have varied widely, both across the State and within schools. In addition, allowing the time ordinarily needed for administering assessments to be used for instruction will ensure that students are receiving the maximum amount of learning possible and help to minimize gaps in learning that have resulted from the disruptions caused by the ongoing COVID-19 pandemic. Ultimately, not administering the tests will reduce student anxiety and will create opportunities for schools to utilize more innovative, meaningful, and holistic assessments to measure student growth and mastery of State learning standards.

For English Language Learners (ELLs), NYSED plans to make its spring 2021 English Language Proficiency (ELP) assessment available for administration to those students who are able to test in-person (while not requiring it for those who cannot safely and fairly participate). This will offer students the opportunity to exit ELL status if appropriate and ensure that the appropriate levels of English as a new language services continue to be provided to students in the upcoming school year. NYSED will work with LEAs to maximize the number of ELL students who can participate in this assessment by exploring test administration policy changes and expansion of the test administration period. Removal of the federal requirements for ELP testing would allow NYSED to offer the most flexibility to LEAs to ensure that students can test to best inform educational programming decisions.

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

NYSED recognizes that the intention of ESEA's assessment requirements is to provide essential data for parents, teachers, school leaders, and the public about how public schools are performing. Given the realities of how the COVID-19 pandemic has disrupted education, NYSED is confident that the SEA and LEAs can best provide the necessary supports for students and schools most in need through avenues other than large-scale assessments.

In summer 2020, every public school in the State had to develop with community input and disseminate a comprehensive reopening plan for the 2020-21 school year. These comprehensive plans detailed how the school would attend to a significant number of mandatory assurances. Specific to this waiver application, several of the assurances addressed teaching and learning, social emotional well-being, special education, bilingual education and world languages, and technology and connectivity. These plans had to detail how the school would assure the continuity of learning through regular substantive interaction between teachers and students; alignment of instruction to the New York State Learning Standards; and routine scheduled times for students to interact and seek feedback and support from their teachers. In developing their reopening plans, equity had to be at the heart of all school instructional decisions. The plan also had to provide clear opportunities for instruction that are accessible to all students whether delivered in- person, remotely or through a hybrid model of instruction.

As a result of the comprehensive school reopening strategy for the 2020-21 school year, students will demonstrate mastery of State learning standards through their coursework, local assessments, their graduation, and post-secondary plans, as they do every year. In addition, all public schools will be required to use their district-developed procedures to identify those students who will be entitled to receive academic intervention services in the upcoming school year. NYSED has made a significant number of instructional resources available to LEAs that allow educators to prioritize students' needs, both academic and social-emotional, and focus on key areas that will prepare students for future success.

As explained above, NYSED plans to make its spring 2021 ELP assessment available for administration to those ELLs who are able to attend school in person at least some days of the week so that they can demonstrate the progress they have made.

NYSED has a robust data collection and reporting system that provides parents and the public with data on how students are achieving and progressing. This system is not limited to test result data and includes detailed information on student enrollment, attendance, course completion, and graduation as well as school climate. Additionally, the best source of information about student achievement remains that which is provided by the LEA. NYSED will continue to require LEAs to report on student achievement as well as other important school-level variables.

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

Section 8401(b)(3)(A) requires NYSED 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. NYSED has fulfilled this requirement by:

- Providing notice and information to the public regarding this request for a waiver on their website at: <http://www.nysed.gov/essa/accountability-and-assessment-waivers-public-comment>. In accordance with normal procedures of the Department, the public was provided with ten (10) business days to provide 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 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 public was invited to share its opinion regarding these two waiver requests in two ways: either by submitting formal written comments to the Department via email or by completing a short, four-question survey. At the close of the public comment period, the Department had received 468 formal public comments and 39,493 responses to the survey. Both the public comments and the survey results were overwhelmingly supportive of the Department submitting this waiver request. Among the public comments received, 84% supported not administering any State assessments this school year while only 16% supported administering all State assessments. Similarly, among survey respondents, 88.5% supported not administering any State assessments this school year while only 4.4% supported administering all State assessments.

Evidence of public postings and email communication by NYSED has been enclosed for review and consideration. Data regarding the public comments and survey data received are also enclosed.

***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 LEAs to continue to provide services to all students by ensuring that instructional time can be used for immediate academic and social-emotional needs created by COVID-19, including the needs of

students with disabilities, English Language Learners, and economically disadvantaged students.

Should you have any questions or need additional information, please feel free to contact me directly at [commissioner@nysed.gov](mailto:commissioner@nysed.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Betty A. Rosa", with a long horizontal flourish extending to the right.

Betty A. Rosa  
Commissioner





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Dear Acting Secretary Rosenfelt:

Section 8401 of the Elementary and Secondary Education Act (ESEA), as recently 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) and 1111(d)(2)(C)-(D) on behalf 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 2020-21 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

***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.

### Rationale for Waiver Request:

Under ESSA, the New York State accountability system assigns a Level from 1 to 4 to each accountability subgroup for each indicator for which a school or district is accountable based on the subgroups' performance on the indicators, where 1 indicates the lowest performance and 4 indicates the highest performance. These levels are used to determine a school's and a district's accountability status based on the level of performance assigned to subgroups for which the school or district is accountable. Even in cases where data can be collected for the individual accountability indicators in order to make determinations at the elementary/middle and high school levels, there is much concern that such determinations for the 2020-21 school year will be distorted by the disparities across the State in learning modality and device/internet connectivity access. These disparities will undermine the Department's ability to make accurate judgments about individual indicators and overall school and district performance, effectively negating the ability to meaningfully differentiate identifications and/or appropriate supports.

In studying the impact of COVID-19 on student learning outcomes, researchers at Columbia University have discovered significant disparities in the degree to which ESSA accountability subgroups are receiving instruction through remote learning during the pandemic. Specifically, the researchers found that:

Schools recording the lowest third-grade math scores are nearly twice as likely to be closed compared to schools recording the highest math scores. The average racial composition of closed schools is 25 percentage points less white compared to schools operating in-person (40% versus 65%). Moreover, closures are more common in schools with a higher share of students who experience homelessness, are of limited English proficiency, are eligible for free or reduced-price school lunch, live in single-parent families, or are racial/ethnic minorities. Distance learning is more common in high schools and middle schools relative to elementary schools, but disparities in exposure to distance learning are comparable across school type. Given the potential negative consequences of school closures on educational performance, the vast inequalities in exposure to distance learning portend rising disparities in learning outcomes.<sup>1</sup>

In part due to these disparities in learning experiences, Scott Marion, Executive Director at the National Center for the Improvement of Educational Assessment argues that “using [statewide assessment] scores in school accountability systems—whether federally or state-mandated—during the 2020-2021 school year may lead to serious potential unintended consequences.”<sup>2</sup> Dr. Marion further states that “disentangling the cumulative and uneven effects of the pandemic from school performance will be difficult, if not impossible, to achieve. Attributing outcomes to school performance is uncertain in any year, but it is simply indefensible immediately following the pandemic.”<sup>3</sup> Daniel Koretz, a research professor at the Harvard Graduate School of Education, has similarly argued that discerning trends in a typical fashion has been disrupted beyond the point of being useful, including for accountability, and that states could not trust comparative data.<sup>4</sup> Randi Weingarten, the president of the American Federation of Teachers, wrote:

We know there are concerns that not having this data will make student achievement during covid-19 and particularly deeply troubling equity gaps less visible, that this will mean two years of lost data. However, there is no way that the data that would come out of a spring

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<sup>1</sup> Parolin, Z., & Lee, E. (2020, November 15). Large Socio-Economic, Geographic, and Demographic Disparities Exist in Exposure to School Closures and Distance Learning. <https://doi.org/10.31219/osf.io/cr6gg>.

<sup>2</sup> <https://www.nciea.org/blog/rethinking-school-accountability-2020-2021-school-year>.

<sup>3</sup> Ibid

<sup>4</sup> <https://www.edweek.org/teaching-learning/states-push-to-ditch-or-downplay-standardized-tests-during-virus-surge/2020/11>

2021 testing cycle would accurately reflect anything, and certainly not accurate enough to hold school systems accountable for results. But curriculum-linked diagnostic assessment is what will most aid covid-19 academic recovery, not testing for testing's sake.<sup>5</sup>

It is the inability to accurately or reliably untangle pandemic impact from school performance on certain accountability indicators that undermines NYSED's ability to meet the intent of the ESEA/ESSA statute and necessitates the requested waiver.

Among numerous measures that demonstrate the uneven effects of the pandemic on students and their academic achievement and growth, the manner in which schools across the State have provided instruction in the 2020-21 school year is particularly clear. A September 2020 survey of instructional models issued by the Department revealed that nearly 63% of schools planned to start the school year providing hybrid instruction, compared to 20% that planned to provide full in-person instruction and 17% of schools that would provide remote only teaching and learning. While the rate of schools planning remote only learning was the lowest of the three models, those schools providing remote only instruction tended to be located in urban settings and were more likely to serve communities with higher concentrations of students from racial and ethnic subgroups. Students attending schools in four of the five largest districts in the State began the year in remote only teaching and learning. Many of those same schools have yet to open for in-person instruction as of the time of this waiver submission.

In districts that provided families the opportunity to choose between in-person and remote instruction models, data collected by the Department indicate that students of color were more likely to select remote instruction compared to their White peers and are more likely to continue in remote learning once in-person options are made available. For example, according to New York City Department of Education's October 9, 2020 Learning Preferences Survey, 52% of students – totaling more than 500,000 students – selected remote instruction over blended or in-person options.<sup>6</sup> The same survey data revealed significant differences between racial groups. The families of 43% of Black students and 41% of White students selected remote-only learning, whereas more than 75% of the families of Asian students and about half of the city's Hispanic students selected remote-only learning.

NYSED anticipates that a significant percentage of students who have learned exclusively in a remote setting all year or those that elected to transition from an in-person or hybrid model to a remote learning environment due to health and safety concerns will be unable to participate in such assessments as the State may administer in the 2020-21 school year, which must be administered in-person. Given the disproportionate participation in remote learning among the various subgroups, NYSED anticipates that participation in State assessments will be similarly disproportionate and will significantly compromise the Department's ability to meaningfully differentiate school and district performance for academic indicators by student subgroup.

Further complicating the extraordinary task of trying to distinguish pandemic impact and school performance concerns is the issue of student access to a computing device for their exclusive use and consistent, reliable access to high-speed internet (e.g., via a hotspot) at a sufficient level to fully participate in remote/online learning. In its July 16, 2020 re-opening guidance, NYSED noted that "Even before the COVID-19 pandemic, the inequitable access to technology and internet services in students' places of residence was a priority to be addressed. The closure of New York schools and subsequent shift to remote learning only highlighted this urgent need. The

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<sup>5</sup> <https://www.washingtonpost.com/education/2020/12/30/calls-are-growing-biden-do-what-devos-did-let-states-skip-annual-standardized-tests-this-spring/>

<sup>6</sup> <https://ny.chalkbeat.org/2020/10/13/21515236/more-than-half-of-nycs-public-school-families-have-opted-for-online-only-learning>

period of remote learning due to school closures presented significant challenges, especially due to the digital divide.”<sup>7</sup> In numerous districts across the state – including those forced to deploy hybrid and remote learning models due to fiscal constraints or state-mandate health and safety protocols – supply chain issues delayed student access to computing devices for weeks and, in some cases, months. A Fall 2020 Digital Equity survey issued by NYSED revealed that statewide more than 215,000 students did not have access to a dedicated computing device. Students in urban/suburban/high needs schools were twice as likely as their peers in average need schools to lack access to a device and five times more likely than their peers in low-need districts.

For many students, including those in both rural and urban settings, access to reliable internet services prevented students from accessing learning materials and synchronous instruction. Students from low-income families, homeless students, and migratory students were disproportionately impacted by this lack of access to critical learning elements. The Fall 2020 survey issued by NYSED revealed that 165,000 students statewide lacked sufficient internet access to fully participate in learning in their home or place of residence. Cost is the most reported barrier to students having sufficient internet access at their places of residence, except for rural schools, where the top barrier is availability. As with the issues identified for instructional modality, access to device/connectivity issues will be disproportionate among districts and subgroups and will compromise the Department’s ability to meaningfully differentiate school and district performance for academic indicators by student subgroup.

In addition to negative impacts on academic indicators, the combination of instructional modality and device/connectivity access issues will have an inconsistent impact on rates of student attendance – an important measure of school quality and student success in the state’s accountability system. In its reopening guidance issued July 16, 2020, NYSED required that “Schools must develop a mechanism to collect and report daily teacher student engagement or attendance.”<sup>8</sup> However, many schools across the state reported difficulties at the beginning of the school year implementing systems for collecting attendance, particularly for those students in hybrid and remote only learning environments. The issue of collecting attendance for students not physically in attendance at the school building is also complicated by the use of both synchronous and asynchronous learning within a remote model. Issues of attendance are exacerbated by a lack of access to a dedicated computing device and reliable internet connectivity for many students. As a result, any measure of chronic absenteeism is likely to become a de facto measure of learning modality, device access, and connectivity reliability instead of school or district performance and, therefore, should not be used for accountability determinations.

Should the Department be compelled to differentiate performance to comply with Sections 1111(c)(4) and 1111(d)(2)(C)-(D), we anticipate significant risk of classification errors that will not only invoke great resistance in the field and undermine support for the system, but also result in a misallocation of resources by NYSED and LEAs. There is strong reason to believe that relative performance of schools in the 2020-21 school year is not a reliable measure of how these schools will perform once full in-person learning resumes. Given the differences in student participation in various learning models and the negative impact on both academic and attendance indicators caused by inconsistent access to computing devices and internet connectivity, NYSED cannot meet the requirements of the ESEA/ESSA statute or the equity goals established in its approved ESSA plan and must be granted the requested waiver.

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<sup>7</sup> <http://www.nysed.gov/common/nysed/files/programs/reopening-schools/nys-p12-school-reopening-guidance.pdf>

<sup>8</sup> <http://www.nysed.gov/common/nysed/files/programs/reopening-schools/nys-p12-school-reopening-guidance.pdf>

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

The requirements for which NYSED seeks a waiver are only the first component in a larger system ultimately designed to ensure all students have consistent and comparable access to the supports, services, and opportunities needed to achieve improved and equitable educational outcomes.

During the development of its approved ESSA Plan, the NYS Board of Regents committed to increasing equity of outcomes in New York State's schools, in part, by explicitly designing the State accountability and support system to require schools and districts to a) reduce gaps in performance between all subgroups, b) incentivize districts to provide opportunities for advanced coursework to all high school students, c) continue to support all students who need more than four years to meet graduation requirements, and d) work with all students who have left school so that they can earn a high school equivalency diploma.<sup>9</sup> Waiving the requirements of Section 1111(c)(4) and Section 1111(d)(2)(C)-(D) requirements for the 2020-21 school year will provide NYSED with the flexibility needed to collaborate with schools and districts to (1) better understand the pandemic's impact on school communities, including the impact on indicators not currently included in the State's ESSA accountability system and (2) identify appropriate actions to meet the academic, social-emotional, and physical health and safety needs of students. For example, the Department will collaboratively study the impact of remote, in-person, and hybrid models on outcomes such as, but not limited to: student academic achievement and academic growth on available assessment data; academic growth; attendance; English Language Proficiency gains; credit accrual; four-, five-, and six-year graduation rates; teacher turnover; parent family engagement; and fiscal equity. Ultimately, understanding the impact of the pandemic on those indicators for all student subgroups will better inform the Department's short- and long-term deployment of supports, technical assistance, and fiscal resources based on the needs of each unique school community.

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

In addition to the planned study of the pandemic's impact on school communities noted above, NYSED will maintain its focus on providing high-quality support to 228 Comprehensive Support and Improvement (CSI) Schools, 258 Targeted Support and Improvement (TSI) Schools, and 216 Target Districts. NYSED will sustain or expand the vast majority of the supports that existed prior to the COVID-19 pandemic. Previously identified districts and schools will be required to develop annual improvement plans and receive both fiscal assistance and technical assistance on implementing their improvement strategies.

The Department's Office of Innovation and School Reform will continue the established progress reporting and management process for 38 Receivership/CSI Schools for the remainder of the 2020-21 school year and throughout 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). Receivership Schools will also be required to engage in ongoing monitoring of established Demonstrable Improvement indicators.

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<sup>9</sup> <http://www.nysed.gov/common/nysed/files/programs/essa/nys-essa-plan.pdf>

All 228 CSI Schools will be required to submit their improvement plan 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. In addition to standard support options, five enhanced support models will continue to be made available to 190 identified non-ReceiverShip Comprehensive Support and Improvement schools. For 258 TSI Schools, this support will continue to be handled primarily by the District, based on the guidance outlined by the Department.

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 on student enrollment, attendance, course completion, and graduation as well as school climate. In 2020-21, NYSED has enhanced its data collection by adding student-level attendance data for both in person and remote instructional settings, as well as school-level collections focused on device and connectivity. Additionally, NYSED will continue to require LEAs to report on student achievement as well as other important school-level variables. Collection of these data elements will directly support NYSED's 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 regarding this request for a waiver on their website at: <http://www.nysed.gov/essa/accountability-and-assessment-waivers-public-comment>. In accordance with normal procedures of the Department, the public was provided with ten (10) business days to provide 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 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 public was invited to share its opinion regarding these two waiver requests in two ways: either by submitting formal written comments to the Department via email or by completing a short, four-question survey. At the close of the public comment period, the Department had received 468 formal public comments and 39,493 responses to the survey. Both the public comments and the



survey results were overwhelmingly supportive of the Department submitting this waiver request. Among the public comments received in regard to the accountability determinations, 100% supported not making accountability determinations this school year. There were no public comments supporting the Department seeking a waiver for some, but not all, accountability provisions. Similarly, among survey respondents, 92.4% supported not making determinations this school year while only 3.8% supported doing so.

Evidence of public postings and email communication by NYSED has been enclosed for review and consideration. Data regarding the public comments and survey data received are also enclosed.

***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 LEAs to continue to provide services to all students by ensuring that instructional time can be used for immediate academic and social-emotional needs created by COVID-19, including the needs of students with disabilities, English Language Learners, and economically disadvantaged students.

Should you have any questions or need additional information, please feel free to contact me directly at [commissioner@nysed.gov](mailto:commissioner@nysed.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Betty A. Rosa", written over a faint, light-colored rectangular stamp.

Betty A. Rosa  
Commissioner

## Social Media on Waiver Requests

### Twitter

The image shows a vertical scroll of six tweets from the NYS Education Department (@NYSEDNews) on January 25. Each tweet includes the department's profile picture (a blue square with 'NYS ED' and a graduation cap icon), a verified account checkmark, and a three-dot menu icon. The tweets discuss draft federal waiver requests for state assessment and accountability requirements, with links to [nysed.gov/ZZx](https://nysed.gov/ZZx). The tweets are as follows:

- Tweet 1:** Two draft federal waiver requests related to state assessment and accountability requirements are now available for public comment, State Education Commissioner Betty A. Rosa announced today. [nysed.gov/ZZx](https://nysed.gov/ZZx)  
2 replies, 16 retweets, 9 likes
- Tweet 2:** The first waiver request seeks to waive state testing requirements at the elementary, middle, and high school levels in spring 2021. [nysed.gov/ZZx](https://nysed.gov/ZZx)  
1 reply, 1 retweet, 4 likes
- Tweet 3:** The second waiver request seeks to eliminate the requirement to assign a Level 1 to 4 to each accountability subgroup for each indicator for which a school or district is accountable based on 2020-21 school year results. [nysed.gov/ZZx](https://nysed.gov/ZZx)  
1 reply, 1 retweet, 1 like
- Tweet 4:** Chnc. Young: Throughout the pandemic the Board's priority has been the physical and mental health, safety, and well-being of the children and adults in our schools.  
1 reply, 3 likes
- Tweet 5:** Chnc. Young: In light of the ongoing pandemic, we have determined that the Spring 2021 state assessments cannot be safely, equitably and fairly administered to students in schools across the state and, therefore, are seeking these waivers.  
1 reply, 6 likes
- Tweet 6:** Interim Cmsr. Rosa: Given the varying circumstance in each school district, the only fair and appropriate decision at this time is to seek waivers to forego testing and accountability requirements for the 2020-21 school year.  
1 reply, 2 retweets, 6 likes





**NYS Education Department**  @NYSEDNews · Jan 25

Interim Cmsr. Rosa: As part of this process we are seeking input from local stakeholders to ensure that our requests capture the experiences of our partners across the state and we look forward to reviewing their comments.



1



2



**NYS Education Department**  @NYSEDNews · Jan 25

Replying to @NYSEDNews

The Department is accepting comments through February 5 and stakeholders are encouraged to fill out a brief companion survey.



Accountability and Assessment Waivers for Public Comment

 [nysed.gov](https://nysed.gov)



2



2



## LinkedIn



**New York State Education Department**

11,558 followers

2d • 

Two draft federal waiver requests related to state assessment and accountability requirements are now available for public comment, State Education Commissioner Betty A. Rosa announced today. The waiver requests address the unique ...see more

### Proposed Federal Waivers for State Assessments and Accountability Requirements Now Available for Public Comment

[nysed.gov](https://nysed.gov) • 3 min read

Two draft federal waiver requests related to state assessment and accountability requirements ar...



7

## Facebook



New York State Education Department

Published by Emily Goodenough · January 25 at 10:39 AM ·

\*\*\*

Two draft federal waiver requests related to state assessment and accountability requirements are now available for public comment, State Education Commissioner Betty A. Rosa announced today. The waiver requests address the unique circumstances caused by the ongoing pandemic that have resulted in many students receiving some or all of their instruction remotely. The first waiver request seeks to waive state testing requirements at the elementary, middle, and high school levels in spring 2021 while the second waiver request seeks to eliminate the requirement to assign a Level 1 to 4 to each accountability subgroup for each indicator for which a school or district is accountable based on 2020-21 school year results.

<http://www.nysed.gov/ZZx>

The Department is accepting comments through February 5 and stakeholders are encouraged to fill out a brief companion survey. The full text of each proposed waiver is posted on NYSED's ESSA webpage.

<http://www.nysed.gov/ZZG>

"Throughout the pandemic the Board's priority has been the physical and mental health, safety, and well-being of the children and adults in our schools," said Board of Regents Chancellor Lester W. Young, Jr. "In light of the ongoing pandemic, we have determined that the Spring 2021 state assessments cannot be safely, equitably and fairly administered to students in schools across the state and, therefore, are seeking these waivers."

"Given the varying circumstance in each school district, the only fair and appropriate decision at this time is to seek waivers to forego testing and accountability requirements for the 2020-21 school year," said Interim Commissioner Rosa. "As part of this process we are seeking input from local stakeholders to ensure that our requests capture the experiences of our partners across the state and we look forward to reviewing their comments."



NYSED.GOV

### Proposed Federal Waivers for State Assessments and Accountability...

Two draft federal waiver requests related to state assessment and accountability requirements are now available for public comment, State...

2,904  
People Reached

588  
Engagements

Boost Post

14

3 Comments 59 Shares

**From:** [NYSEDCommunications](#)  
**To:** [NYSEDCommunications](#)  
**Subject:** NEWS RELEASE: PROPOSED FEDERAL WAIVERS FOR STATE ASSESSMENTS AND ACCOUNTABILITY REQUIREMENTS  
NOW AVAILABLE FOR PUBLIC COMMENT  
**Date:** Monday, January 25, 2021 10:32:22 AM  
**Attachments:** [image008.png](#)  
[image010.emz](#)  
[image011.png](#)

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Knowledge > Skill > Opportunity

New York State Board of Regents  
Betty A. Rosa  
Interim 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 January 25, 2021**

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

### **PROPOSED FEDERAL WAIVERS FOR STATE ASSESSMENTS AND ACCOUNTABILITY REQUIREMENTS NOW AVAILABLE FOR PUBLIC COMMENT**

**Waivers Would Allow the State to Forego Testing Students in 2020-21**

**Comments Accepted Through February 5**

Two draft federal waiver requests related to state assessment and accountability requirements are now available for public comment, State Education Commissioner Betty A. Rosa announced today. The waiver requests address the unique circumstances caused by the ongoing pandemic that have resulted in many students receiving some or all of their instruction remotely. The Department is accepting comments through February 5 and stakeholders are encouraged to fill out a brief companion survey. The full text of each proposed waiver is posted on [NYSED's ESSA webpage](#).

“Throughout the pandemic the Board’s priority has been the physical and mental health, safety, and well-being of the children and adults in our schools,” said Board of Regents Chancellor Lester W. Young, Jr. “In light of the ongoing pandemic, we have determined that the Spring 2021 state assessments cannot be safely, equitably and fairly administered to students in schools across the state and, therefore, are seeking these waivers.”

“Given the varying circumstance in each school district, the only fair and appropriate decision at this time is to seek waivers to forego testing and accountability requirements for the 2020-21 school year,” said Interim Commissioner Rosa. “As part of this process we are seeking input from local stakeholders to ensure that our requests capture the experiences of our partners across the state and we look forward to reviewing their comments.”

The first waiver request seeks to waive state testing requirements at the elementary, middle, and high school levels. This waiver would also allow the Department to administer the New York State English as a Second Language Achievement Test (NYSELSAT) only to those English Language Learners who are able to attend school in person at least some days of the week.

The Department’s second waiver request seeks to eliminate the requirement to assign a Level 1 to 4 to each accountability subgroup for each indicator for which a school or district is accountable or identify schools for improvement in fall 2021 based on 2020-21 school year results. Separate from the waiver, NYSED will seek an amendment to New York’s approved ESSA plan that would allow certain schools that are currently identified for improvement but made progress based on 2018-19 school year results to petition for removal from improvement status based on modified 2020-21 school year exit criteria.

Upon approval of these waivers by USDE, NYSED will seek an additional waiver from certain ESSA reporting requirements pertaining to assessments and accountability.

Comments on the draft waivers may be emailed to [ESSAComments@nysed.gov](mailto:ESSAComments@nysed.gov) with “ESSA Comments from (sender/organization name)” in the subject line. Comments will be accepted through February 5, 2021. In addition, stakeholders are encouraged to fill out a brief survey regarding the 2020-21 school year student assessment and school accountability processes.

## **Next Steps**

In February, NYSED will present a summary of the public comments received on the two draft waiver requests to the Board of Regents. If the waivers are 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 waivers.

-30-

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**From:** [Title1-Cops](#)  
**To:**



**Subject:** NEWS RELEASE: PROPOSED FEDERAL WAIVERS FOR STATE ASSESSMENTS AND ACCOUNTABILITY REQUIREMENTS NOW AVAILABLE FOR PUBLIC COMMENT  
**Date:** Monday, January 25, 2021 11:24:28 AM  
**Attachments:** [image008.png](#)  
[image003.wmz](#)  
[image004.png](#)  
**Importance:** High

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Colleagues – please see below regarding public comment period for proposed federal waivers for state assessments and accountability requirements.

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**From:** NYSEDCommunications <[NYSEDCommunications@nysed.gov](mailto:NYSEDCommunications@nysed.gov)>  
**Sent:** Monday, January 25, 2021 10:32 AM  
**To:** NYSEDCommunications <[NYSEDCommunications@nysed.gov](mailto:NYSEDCommunications@nysed.gov)>  
**Subject:** NEWS RELEASE: PROPOSED FEDERAL WAIVERS FOR STATE ASSESSMENTS AND ACCOUNTABILITY REQUIREMENTS NOW AVAILABLE FOR PUBLIC COMMENT



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New York State Board of Regents  
Betty A. Rosa  
Interim 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 January 25, 2021**

Media Contact:

## **PROPOSED FEDERAL WAIVERS FOR STATE ASSESSMENTS AND ACCOUNTABILITY REQUIREMENTS NOW AVAILABLE FOR PUBLIC COMMENT**

### **Waivers Would Allow the State to Forego Testing Students in 2020-21**

#### **Comments Accepted Through February 5**

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"Throughout the pandemic the Board's priority has been the physical and mental health, safety, and well-being of the children and adults in our schools," said Board of Regents Chancellor Lester W. Young, Jr. "In light of the ongoing pandemic, we have determined that the Spring 2021 state assessments cannot be safely, equitably and fairly administered to students in schools across the state and, therefore, are seeking these waivers."

"Given the varying circumstance in each school district, the only fair and appropriate decision at this time is to seek waivers to forego testing and accountability requirements for the 2020-21 school year," said Interim Commissioner Rosa. "As part of this process we are seeking input from local stakeholders to ensure that our requests capture the experiences of our partners across the state and we look forward to reviewing their comments."

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## Next Steps

In February, NYSED will present a summary of the public comments received on the two draft waiver requests to the Board of Regents. If the waivers are 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 waivers.

-30-

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## Public Comment Webpage for ESSA Waiver Requests to USDE

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

The screenshot shows a web browser window with the URL [nysed.gov/essa/accountability-and-assessment-waivers-public-comment](http://www.nysed.gov/essa/accountability-and-assessment-waivers-public-comment). The browser's address bar indicates it is not secure. Below the browser window, there is an orange banner with the text "Every Student Succeeds Act (ESSA)".

The webpage content is divided into two main sections. On the left is a blue sidebar with a menu for the "Every Student Succeeds Act (ESSA)". The menu items are: "New York State ESSA Plan", "2020-2021 Consolidated Application", "Accountability and Assessment Waivers for Public Comment" (which is highlighted), "Accountability Designation Materials", "Allocations", "Complaint Procedures", "Fact Sheets", and "Financial Transparency".

The main content area on the right is titled "Accountability and Assessment Waivers for Public Comment". It contains the following text:

*This page will provide information about New York State's Every Student Succeeds Act (ESSA) Waivers and Public Comments.*

January 25, 2021:

The New York State Education Department (NYSED) is seeking input from stakeholders about the need for additional flexibility related to certain provisions of the federal Every Student Succeeds Act (ESSA) pertaining to administration of State assessments in spring 2021 and identification of schools and districts for improvement.

Comments on the draft waivers may be e-mailed to [ESSAComments@nysed.gov](mailto:ESSAComments@nysed.gov) with "ESSA Comments from (sender/organization name)" in the subject line. Comments will be accepted through February 5, 2021. In addition, stakeholders are encouraged to fill out a brief [survey](#) regarding the 2020-21 school year student assessment and school accountability processes.

[NYSED Assessment Waiver Request Letter to USDE](#)

[NYSED Accountability and School Identification Waiver Request Letter to USDE](#)



## **Public Comment Summary for ESSA Assessment Waiver Request to USDE**

The public was invited to share its opinion regarding these two waiver requests in two ways: either by submitting formal written comments to the Department via email or by completing a short, four-question survey. At the close of the public comment period, the Department had received 468\* formal public comments and 39,493 responses to the survey. Both the public comments and the survey results were overwhelmingly supportive of the Department submitting this waiver request. Among the public comments received, 84% supported not administering any State assessments this school year while only 16% supported administering all State assessments. Similarly, among survey respondents, 88.5% supported not administering any State assessments this school year while only 4.4% supported administering all State assessments.

Evidence of public postings and email communication by NYSED has been enclosed for review and consideration. Data regarding the public comments and survey data received are also enclosed.

\*The final count is based on the number of e-mails received that communicated support for or opposition to the ESSA Assessment waiver. Three e-mails did not indicate a position regarding the waivers, so were not included in the count and percentage calculations.

## **Public Comment Summary for ESSA Accountability Waiver Request to USDE**

The public was invited to share its opinion regarding these two waiver requests in two ways: either by submitting formal written comments to the Department via email or by completing a short, four-question survey. At the close of the public comment period, the Department had received 468\* formal public comments and 39,493 responses to the survey. Both the public comments and the survey results were overwhelmingly supportive of the Department submitting this waiver request. Among the public comments received in regard to the accountability determinations, 100% supported not making accountability determinations this school year. There were no public comments supporting the Department seeking a waiver for some, but not all, accountability provisions. Similarly, among survey respondents, 92.4% supported not making determinations this school year while only 3.8% supported doing so.

Evidence of public postings and email communication by NYSED has been enclosed for review and consideration. Data regarding the public comments and survey data received are also enclosed.

\*The final count is based on the number of e-mails received that communicated support for or opposition to the ESSA Accountability waiver. Three e-mails did not indicate a position regarding the waivers, so were not included in the count and percentage calculations

# New York State Education Department Analysis of Survey Responses Collected for Proposed Federal Waivers for State Assessments and Accountability Requirements



## NYSED Request for Stakeholder Input on Flexibility to ESSA Requirements

The New York State Education Department (NYSED) is seeking input from stakeholders about the need for additional flexibility related to certain provisions of the federal Every Student Succeeds Act (ESSA) pertaining to administration of State assessments in spring 2021 and identification of schools and districts for improvement. For additional information about possible flexibilities, please visit:

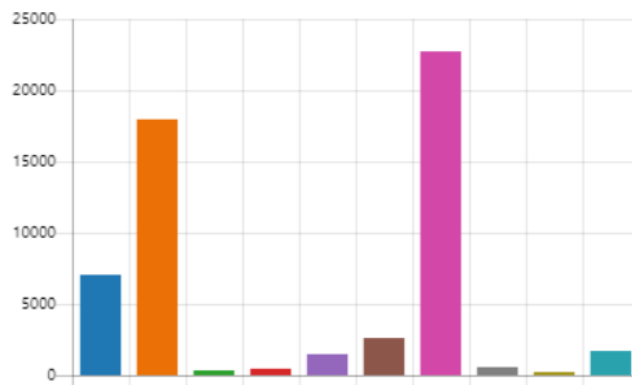
<http://www.nysed.gov/accountability/accountability-waivers-assessment-and-public-comment>.

Please share your opinion by participating in this brief survey.

### 1. Which description best describes you as a stakeholder (check all that apply):

[More Details](#)

A. Community Member	7008
B. Parent of a K-12 student	18008
C. School Board Member	299
D. Superintendent or other dis...	448
E. Principal or other school lea...	1462
F. School Support Staff	2582
G. Teacher	22685
H. College or University Staff ...	533
I. Advocate Organization Repr...	257
J. Other	1672



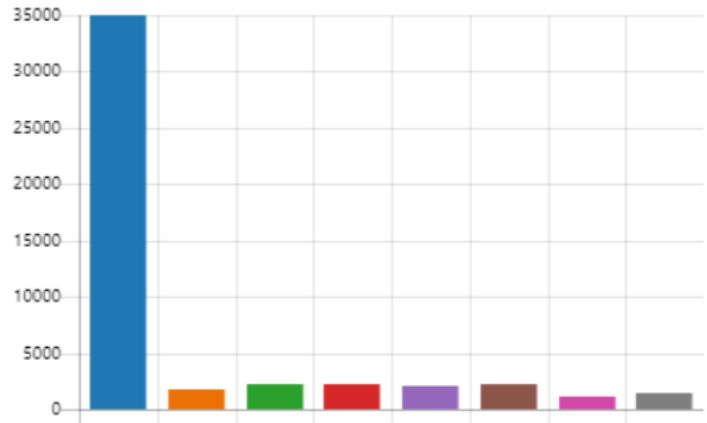
# New York State Education Department

## Analysis of Survey Responses Collected for Proposed Federal Waivers for State Assessments and Accountability Requirements

2. From the list below, please identify which State assessments you believe NYSED should NOT administer in spring 2021 due to the impact of the COVID-19 pandemic. (check all that apply):

[More Details](#)

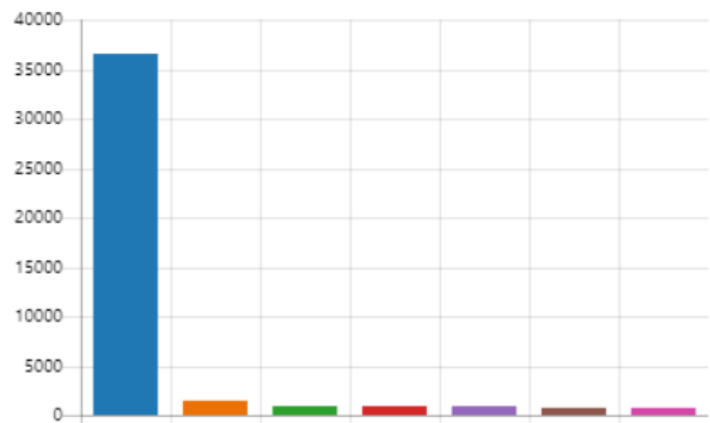
<span style="color: blue;">●</span> A. No State assessments shoul...	34948
<span style="color: orange;">●</span> B. All State assessments shoul...	1731
<span style="color: green;">●</span> C. Grades 3-8 English Languag...	2247
<span style="color: red;">●</span> D. Grades 3-8 Mathematics	2247
<span style="color: purple;">●</span> E. Grades 4 and 8 Science	2074
<span style="color: brown;">●</span> F. High School Regents Exami...	2271
<span style="color: magenta;">●</span> G. New York State English as a...	1154
<span style="color: gray;">●</span> H. New York State Alternate A...	1465



3. From the list below, please identify those ESSA accountability requirements for which you believe NYSED should seek flexibility for the 2020-21 school year (check all that apply):

[More Details](#)

<span style="color: blue;">●</span> A. All ESSA accountability req...	36479
<span style="color: orange;">●</span> B. All ESSA accountability requ...	1483
<span style="color: green;">●</span> C. Assign a performance level ...	883
<span style="color: red;">●</span> D. Identify schools as potentia...	882
<span style="color: purple;">●</span> E. Identify schools for Targete...	841
<span style="color: brown;">●</span> F. Identify schools for Compre...	779
<span style="color: magenta;">●</span> G. Identify districts as Target D...	666



New York State Education Department Public Comment Regarding Proposed Federal Waivers (E-Mail)

#	Date of Email	Stakeholder Group	In Favor of the Waiver(s) (Yes/No)	<p align="center"><b>Comment</b></p> <p align="center"><i>Note: Items have been redacted to ensure privacy of stakeholders.</i></p>
1	1/25/2021	School staff	Yes	<p>Thank you for this opportunity to express myself. As a lover of data and measurement, I am one who is not completely opposed to standardized testing. Having come from [REDACTED] where we did not have anything like Regents exams, I do see their value.</p> <p>That said, this year is like no other. We are doing the best we can, and it is a year when stress is at an all time high for staff and students. I believe we need to work harder on forming connections with students and keeping them engaged at this time so that they are getting something. Forcing teachers to get through curriculum will only leave our stragglers further behind. The removal of tests for this year will be a blip in our data, but will also give us some flexibility to meet the true needs of our staff and students. And trust me, our teachers are VERY married to their curriculum and it will still receive more focus than necessary!</p> <p>Another issue with having the testing, is putting all the proper covid procedures in place. This would be a logistical nightmare. And some parents are simply not comfortable with their child being in school this year (myself included). I would not want to bring my child in for testing.</p> <p>All that said, my middle school is on a CSI list. We should be held accountable, within reason, to meeting those goals. Of course covid makes everything difficult, but there were measurable actions recommended to us, and we should be required to do them. We can measure our success without state test scores. I am not sure that we should be punished if we can't do things, but we should continue to be held accountable and be given support as we move forward.</p>
2	1/25/2021	Not specified	Yes	<p>I appreciate the ability to give the NYSESLAT to students but what about our ENL students who are fully remote? If we they are willing to come in to take the test, can we administer it? The way the letter reads, our fully remote ENL students would be in the same levels as 2 years ago. We need to have a way to determine if they need more or less services.</p>
3	1/25/2021	School staff	Yes	<p>Sadly, the pandemic has exposed startling inequities in the educational system in New York State. In my district, there have been a variety of issue related to Wifi connections, illness, death, home life issues, computer issues, and other challenges that students, particularly students who are economically disadvantaged, have struggled with each day.</p> <p>Seeing my students struggle each and every day as never before has strongly influenced my perspective on the topic of standardized testing. Our students are struggling to survive. They have experienced trauma, stress and life changing challenges on a scale beyond anything that can be measured.</p> <p>Given the truly exceptional circumstances of the pandemic, it is appropriate to seek a waiver from USDE for all NYS standardized testing for the 2020-2021 school year.</p>

New York State Education Department Public Comment Regarding Proposed Federal Waivers (E-Mail)

#	Date of Email	Stakeholder Group	In Favor of the Waiver(s) (Yes/No)	<p align="center"><b>Comment</b></p> <p align="center"><i>Note: Items have been redacted to ensure privacy of stakeholders.</i></p>
4	1/25/2021	Teacher	Yes	<p>Under other circumstances, I would not advocate for cancelling these exams. This school year has been exceptional.</p> <p>I work in a district that is fortunate to have the technology, resources and a great plan to deal with hybrid learning. Even we move at a much slower pace. Most of my "hands on" science activities are not able to be done this year, leaving students with a much weaker understanding of the material.</p> <p>As a teacher, I feel my choices are to rush through material so we "cover it all" or slow down and really make sure they understand what I am teaching. This leaves us either glossing over important concepts or not getting to all concepts. Additionally, my special needs students are not getting the support they need despite everyone's best efforts.</p> <p>Students who lack the maturity to independently learn at home are struggling even more than most.</p> <p>I do believe that students and teachers have done an amazing job or rising to this challenge, but the learning is simply insufficient for the exams we prepare for and the circumstances, statewide, are too inconsistent.</p>
5	1/25/2021	Principal	Yes	<p>As [REDACTED], I support the waiver presented. There is absolutely no level playing field for any type of standardized testing at this time. Even within our own school we have kids who have only had remote learning experiences, some with a hybrid schedule, and even a group that (due to IEP's) have been in attendance in-person 5 days per week. These experiences create a very different outcome for each group. Expanding this dilemma across our county and ultimately, the state, there is no way to fairly present an assessment that captures the vast differences in experiences NY kids have had during this pandemic.</p>
6	1/25/2021	Parent	Yes	<p>My daughter is in the 9th grade. She has always been in honors classes and has maintained highest honor roll in every quarter in every year. Since the pandemic, she has been doing her crisis-schooling from home. If she has to take the regents this year, she will not pass them and she will get left back. Her school is failing her. They have zero lessons being taught. Not a single one of her teachers records a lesson. All work is assigned with youtube videos or silent power points as her only lesson. This format has been disastrous for her learning style and her mental health has suffered greatly as a result. Please grant the waiver for this year. Please..</p>
7	1/25/2021	District personnel	Yes	<p>I support requesting a waiver for the 2021 NYS ELA, Math and Science exams in grades 3-8.</p> <p>The students in our district have had multiple learning experiences due to our NYS yellow zone designation and of course the overall nature of the pandemic. Our students have been fully virtual for 3 weeks in September, hybrid for September 21st-November 20th, fully virtual from November 20th-January 19th and back to hybrid.</p>

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				<p>Some students have remained fully virtual all year.</p> <p>We are assessing our students in ELA and Math and Science with locally designed assessments as well as some standardized online testing tools. It would likely result in some inauthentic data if we were to try to administer the NYS exams and there will likely be many students who are not willing/able to come in person for testing sessions.</p> <p>I believe that the 2021-2022 school year should be a new baseline year for NYS assessments and that schools previously identified as needing improvement should be given the opportunity to begin anew (if progress was shown as is indicated in this brief).</p> <p>Thank you for encouraging comments from the field.</p>
8	1/25/2021	School staff	Yes	<p>I strongly support these two proposed waivers for NYS Spring Assessments. As a school mental health professional, I see first hand the daily impact the new remote/hybrid model is having on our students and do not see :</p> <ul style="list-style-type: none"> <li>*how the assessments can be administered in a safe environment</li> <li>*how they can be confidently prepped for these assessments with the current level of anxiety/stress in every classroom</li> </ul> <p>I would love to see the stress and anticipation of these assessments be removed from all staff and students for this school year.</p>
9	1/25/2021	Principal	Yes	<p>Thank you for giving people the opportunity to give input regarding accountability and assessment waivers regarding the NYS 3-8 assessments. I do not think it is possible to give a fair or valid state assessment this year. There has been far too much inconsistency regarding equal access and quality of education between students. At best, our students attend school in person twice a week. At worst, many students have not stepped foot in school all year due to panic and fears regarding COVID-19. Some of our students do not even have the internet at home. I do not see how it is possible to give a fair state assessment this year. More importantly, I am not convinced the results of an assessment would truly give us meaningful feedback this school year. We understand that most students have learning gaps from not being in school five days a week as we are accustomed to. We also understand that we need to do our best to close those gaps as soon as possible. I urge NYSED to wait until it is safe for all students to return to school in person before we administer the NYS assessments again.</p>
10	1/25/2021	School staff	Yes	<p>I strongly support these waivers as an educator and as a parent. I have two students that would be affected by this waiver. One of which has struggled significantly with certain courses due to not having the same educational environment as he has in the past. It is certainly NOT due to a lack of effort on the part of the educators. The</p>

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				<p>educators are giving their best to students everyday, but no matter what their best is, it is still isn't equal to the "normal school day" and educational experiences they have had in the past.</p> <p>I do not feel that it is right to "punish" the students and teachers by having to give standardized testing ever, but especially this year.</p> <p>I thank you for creating these drafts to be submitted for consideration and strongly support your efforts and decision to move forward with presenting these to the federal government.</p>
11	1/25/2021	District personnel	Yes	<p>I am in complete support of seeking a waiver for accountability measures for the 2020-21 school year. Students and teachers are under tremendous pressure and strain while teaching and learning in the midst of a pandemic. To act as if this is a normal year and that students' learning can be assessed in the manner in which it has been done in the past is ludicrous. There will be no consistency in administration as every district has developed it's own learning structure, thereby eliminating any validity or reliability. Our teachers and students need time together to maximize learning opportunities. Taking time out for tests at this juncture robs them of critical time to interact together, whether in person or in a remote learning environment.</p> <p>There will be time to assess the impact of the pandemic, and the impact of instruction during the pandemic through the lens of accountability at a later time. Our teachers know how their students are doing. Let's please get out of their way and let them do their job. Right now that job is making sure that students are safe and connected, and that they are learning. No test will reveal that.</p>
12	1/25/2021	District personnel	Yes	<p>I would respectfully and strongly request that New York State request to be exempted from grades 3-8 testing for the 2020-2021 academic year. This year has been a very difficult year for not only our students and our families but for our staff members. People are highly anxious, losing people in their families due to Covid as are students. So many reasons to exempt the tests this year.</p> <p>There are always multiple priorities on our plates. This year, like we are doing for each of our students, families and staff, I ask that the federal government grant us some grace in these highly challenging time and relieve our responsibility to test our already deeply stressed children.</p>
13	1/25/2021	Principal	Yes	<p>It is refreshing to hear that NYSED is applying for the waivers associated with the state assessment program. This will allow us to focus on all of our students and staff members' mental health.</p> <p>Thank you for applying.</p>
14	1/25/2021	School administrator	Yes	<p>I strongly feel that the state testing requirements in elementary, middle, and high school this year are waived. Students have had inconsistent modes of learning using brand new technology, styles, and methods that the student and teacher have not used before.</p>
15	1/25/2021	School staff	Yes	<p>I do not see any way that we can make students take state tests until we resume school everyday for all students.</p>



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16	1/25/2021	Principal	Yes	<p>I strongly recommend that the testing be waived for the current academic year due to the pandemic and its associated problems.</p> <p>At this time, as with many other schools, we have a large number of students who are working from their homes. Trying to administer an assessment to them would be impractical as devices and connectivity are inconsistent and there would be no way to monitor security of an exam outside of school</p> <p>Administering in school to a limited number of students would skew results in such a way as to make them useless for instructional planning purposes and would not be indicative of the quality of instruction.</p> <p>Thank you for allowing me to comment on this issue.</p>
17	1/25/2021	Teacher	Yes	<p>Please eliminate all state test for the school year 2020-2021. It is not necessary to put the students through these stressful tests especially as we already know they are not prepared. It is just cruel. Let us use common sense. In the end it will not matter that in 2020-2021 they did not take a state test, it will not affect the outcome of their lives. Let the teachers teach based on where they are this year and not have to worry about preparing them for a test that there has not been adequate in person time to be prepared for.</p>
18	1/25/2021	Teacher	Yes	<p>In regards to state testing this school year (2020/2021), I am deeply concerned about the well-being of our hybrid/remote students should the state decide to go forward with state testing.</p> <p>Please read my bulleted explanation as to why state testing should be canceled this school year:</p> <ul style="list-style-type: none"> <li>* it is a challenge to assess children online - has been throughout the school year</li> <li>* children have been on and off line throughout the school year due to technology issues losing valuable teaching time</li> <li>* some children will be taking testing online and some in person (not equitable for all children)</li> <li>* if all take state testing online - some at home - many are not equipped to take tests online/others may be assisting them (invalid data)</li> <li>* taking assessments online is stressful for young children (I gave up spelling assessments this year, as it was leading to tears and frustration)</li> <li>* I believe many parents will elect to opt their children out of testing; thus, it won't give good and valid data to our state education representatives anyway.</li> <li>* the expense of the state testing when it will not be good and valid data</li> <li>* most importantly: <ul style="list-style-type: none"> <li>* the emotional well-being of our students needs to be our top priority this year</li> <li>* state testing does not lend itself to the emotional well-being of our students this school year</li> </ul> </li> </ul>

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19	1/25/2021	Teacher	Yes	<p>I am a 4th grade teacher with the [REDACTED]. I would like to offer comments on why state assessments and accountability requirements should be waived for this school year.</p> <p>This school year has been marked with nothing but interruptions and inconsistencies for our students. Students who are in-person have had to deal with the anxiety of social distancing and masking requirements with very few breaks. They are constantly reminded of the pandemic, and we have seen an increase in nervous, scared children who cannot learn to the best of their abilities under these circumstances. Students who are remote struggle with inconsistent schedules, spotty internet (which results in lost class time), and a lack of socialization with their peers, which has added to their anxiety.</p> <p>Although there is no doubt in my mind that our teachers and our district are doing their very best to provide love and support for our students and families, circumstances beyond our control have resulted in large quarantines - one such incident which took place right before Christmas - and increasing concern about the health of students and staff. This increasing concern has only led to an increase in the overall stressed atmosphere in the building, among our families and students, and among our faculty and our staff.</p> <p>Many in our community have found their livelihoods crushed by the pandemic. Our students often do not know where their next meal will come from. The school delivers food on a regular basis, but remote instruction often interrupts or changes this process, adding to the stress of everything. Students who are hungry cannot learn. Parents and families who are stretched thin by lost jobs and a crashing economy often unknowingly thrust their own stress and anxiety onto their children. Children who feel these things also cannot learn. Schools have also had to deal with increased regulations and requirements to stay open with almost no support from the federal government. Given the pandemic and the increasingly stagnant economy, our building made the choice to purchase all school supplies for our students instead of asking families to send in items that are normally asked for (glue sticks, folders, etc). Although this was appreciated, it also ate into budgets that were already feeling tight due to social distancing and masking requirements. Our district alone is facing a 2.1 million dollar shortfall if nothing changes at the federal level. This knowledge has only added to the anxiety many of us are already feeling.</p> <p>In one of the most trying times to work in a school, educators have been praised recently as heroes by the new First Lady herself Dr. Biden. And yet we are still having to fight tooth and nail to be heard, to have the state</p>

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				education department trust us to do our jobs without the extra burden of state assessments and accountability requirements. There's enough on the plates of families, students, teachers, and administrators right now without the added stress and anxiety of state assessments. Please hear us. Thank you.
20	1/25/2021	District personnel	Yes	<p>I support both of the New York State ESSA waivers as written. While it is helpful to have student growth and achievement data to help local educational agencies make decisions about programing and interventions for their students, most district have sufficient local data to accomplish that task this year without State testing. Furthermore, there would be no way to equitable administer these tests to the significant portion of students whose families have chosen exclusively remote learning. Additionally, the logistics of administration would be nearly impossible in districts that have reduced student density for in-person instruction. It is difficult to imagine how the tests could be securely administered when students attend school only some days of the week. I also support the decision to offer the NYSESLAT only to students who are in person.</p> <p>While it may not be part of the waiver process, I would also encourage NYSED to develop an alternative method for exiting qualified ELLs who are unable to sit for the NYSESLAT.</p>
21	1/25/2021	Principal	Yes	<p>Testing with assessments designed for specific instructional characteristics is not valid under our current hybrid/remote circumstances.</p> <p>Any data collected in this way would need to be disqualified for use in any meaningful decision-making. It would be a waste of the money and effort it took to create these assessments. To administer carefully designed assessments under inappropriate circumstances, would be like cooking 10,000 hot dogs for a baseball game that got rained out.</p>
22	1/25/2021	District personnel	Yes	<p>The decision to waive the assessment requirements for New York state public school students for the 2020-2021 school year is one which demonstrates a commitment to equity, and a true understanding of the many obstacles to learning brought about by this pandemic. While [REDACTED] has done an incredible job of safely carrying out both hybrid and remote daily schedules, staffing issues, social distancing, technological challenges, and the frequent and unpredictable quarantines have caused frequent disruptions and hindered learning greatly this fall. Students already demonstrating significant gaps in reading and writing have not had enough opportunities to regain lost skills and learning. In fact, the opposite is true. Even for students who are able to attend school in person, time with teachers, learning and applying new content and skills, has been very limited both in terms of actual daily schedules, especially in terms what was possible in blended learning English classrooms. Many of the students who exhibited social and emotional struggles prior to the current health crisis have become altogether disengaged. Teachers, principals, school counselors and other support staff have utilized creative and</p>

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				<p>compassionate strategies to encourage reluctant and/or entirely absent secondary students to learn, succeeding some cases but not many. Faced with shortened schedules and social distancing constraints, Elementary teachers have had to abandon many assessment and instructional practices, and find that monitoring students' reading and writing progress is extremely difficult. We have adjusted many of our strategies to assess and to teach very young children, but many children, lacking support and resources at home, are at a visible disadvantage. As all of us in education know, this disease has proven the dedication and determination of most teachers. We need to allow them to continue to reach out to the most vulnerable students, and removing the pressure and complications of testing in this environment is the way to do so.</p>
23	1/25/2021	District personnel	Yes	<p>It is my belief that the 2020-21 school year has been so severely compromised that a repeal of NYS Testing is not a request but a mandatory decision. President Biden and the Federal Department of Education should recognize this national crisis in education and suspend the requirement of state testing for the near future as only 5% of the total population has been vaccinated as of January 25,2021.</p> <p>Educators across the board, most especially the faculty at [REDACTED], have diligently worked to teach curriculum but also to hold up our students in a time of great strife! Social emotional learning, recognized by the NYS Department of Education as a critical component in education, has taken center stage. Students are on various levels of coping and our teachers have seen to it that their students so not suffer in silence. That being said, one cannot presume then that all students have been able to learn as they cope during this pandemic.</p> <p>Equality in medical care has been questioned. Equality in the manner with which students have been able to access education has not been fairly consistent. Technologically Disadvantaged, a term which acknowledges the inequity found in both equipment and with internet access. Students who are without the necessary pieces to learning, automatically become the students in need of more time with their teachers. Suspending testing would give them time, time to adjust to a new way of learning. Time would also be the social adjuster, if you will, in allowing students who have not been with their teachers face to face classes as this has been the norm during all testing periods. I thank you for your time and willingness to hear from the field.</p>
24	1/25/2021	Parent	Yes	<p>I wanted to write in support of your draft letter to suspend assessments this year. I do not feel safe sending my children who have been learning remotely into a school building to take an assessment. While I know that I have the right to opt out of the test, it feels like administering the test when many families, like mine, are not comfortable taking that test, is not right. It is also a year where inequities have just been exacerbated by the pandemic and these tests will just make those gaps larger.</p>

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25	1/25/2021	Not specified	Yes	I feel as though the state testing requirements should be waived. Some children have not only gone back and forth with remote, to in person learning, but many have gotten sick, to multiple quarantines due to exposure. I don't think it's fair to the kids and the students to have to require testing that could potentially hold them back from moving up a grade. I don't think it's their fault the pandemic hit, and I don't think they should be penalized. They would have this weighing into their factoring grades. If testing is given, it shouldn't play a part in their grade. It should just be for the districts to figure out where they need more focus on for students' education.
26	1/25/2021	School staff	Yes	Unnecessary testing does nothing but harm students and takes away valuable teaching time. With many schools going hybrid and in and out of in-person learning, how can the state feel that it is equitable to continue to put forth these tests. Please make a prompt decision so that we can plan appropriately for our students' needs. Thank you.
27	1/25/2021	Parent	Yes	<p>I may not have much of a voice in the matters as it pertains to the Entire state of NEW YORK, but as a parent of students in the public school system I feel I need to say my peace on this request for Waivers.</p> <p>IT NEEDS TO BE APPROVED AND APPROVED QUICKLY WITHOUT ANY STIPULATIONS!</p> <p>Here are a few of the reasons why: As a parent of a child with Disabilities school is a struggle on a regular basis when they are there FULL DAYS 5 days a week without any interruptions. Now take into account a child that struggles to maintain his/her grades each and every day and now no longer gets the full attention of the teachers, due to computer glitches, internet issues, wireless trouble, families can not afford the proper equipment.</p> <p>No let's add on the stress of all of this plus the pressure to pass these INSANE exams that stru;ly ref;lect NOTHING on some kids. Not every child learns the same, nor do they retain the same knowledge. For some children this causes UNDUE STRESS, ANXIETY and fear of failure. Making them take these during the most unprecedented times in anyone's lives is beyond comprehensible. When these students fail these exams and are required to take an additional class next fall to only have to retake the exam and fail it again to continue this cycle is just ridiculous and cruel. We are the only state that requires these exams and Regents exams. It does not reflect on the actual knowledge of the individual.</p> <p>I pray daily that you will look to the future needs and mental wellbeing of our children. Adding more stress to their lives with undue testing is cruel and inhuman during this pandemic of epic proportions Please take into</p>

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				account this is not needed to prove our children are smart or dumb, this just creates more struggles, fears, depression and anxiety in our children.
28	1/25/2021	School staff	Yes	I teach fifth grade at [REDACTED] Please, I urge you not to ask my students to take the State Tests this year. This pandemic has already put too much daily stress on them, let alone having to worry about more testing.
29	1/25/2021	District personnel	Yes	Currently our faculty and staff is working tirelessly to connect and engage with our students in PreK - 12th grade. On a very basic level, teachers are working through connectivity issues with families as our school district is in a rural area. Beyond that, there are a myriad of issues that lie outside of the district and teacher's control, such as secondary students working to support family, secondary and even upper elementary students caring for siblings, the constant interruption due to families and students facing quarantine, which is out of their control, as well as loved ones experiencing job loss, financial insecurity and serious health concerns due to COVID. Due to all of these factors, it is our belief and request that any state or federal assessments be suspended for this school year.
30	1/25/2021	School staff	Yes	I am writing to name that in reading the draft waiver that will be sent to the US Department of Education regarding the 3rd-8th grade assessments, I very much agree with the request to seek this waiver. As a principal at [REDACTED], I believe it would be nearly impossible to administer these tests this year, with our current safety precautions and concerns, spacing issues, and staffing variability and concerns. We are very much working to assess student progress on a daily basis, and we will continue to use these formative assessments to ensure that we are instructing students appropriately. I believe that this should take the place of standardized assessment this year, given that it would be difficult to ensure that it was actually standardized and fair.
31	1/25/2021	School staff	Yes	Thank you for this opportunity to provide feedback on the federal waivers from testing and accountability. I think it is unreasonable to ask districts to assess students in State Assessments when we are in a pandemic. Many of our students are struggling learners this year, trying to learn at home and a couple days at school. We have some students, due to circumstances that are not in their control, are dealing with social and emotional issues that make learning the last thing on their mind. We are providing as much support as we possibly can, but to ask students to take a grade level based assessment at this time really seems unreasonable. Our Covid numbers are high in our area and daily we receive communication from families that they will not be sending their children to school. Most of our families have the internet, but some of our most struggling students do not. With so many inequities within our district, let alone the State why would we ever believe assessing students this year is the right thing to do.

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32	1/25/2021	District personnel	Yes	<p>Please waive the 2020-2021 NYS testing for grades 3-8. Students have struggled to learn this year due to Covid closures, distance learning, lack of excellent in-person teaching, fear, family turmoil, hunger, loss of employment, etc. etc. I think it would be immoral to add testing anxiety onto a load already too heavy for students, parents and teachers to carry. The results will not only be inaccurate, but disregarded by teachers who normally use the data to improve teaching. We cannot call in support for students with IEPs and 504s with the covid restrictions, and don't have the counseling support for the meltdowns that will occur. Please understand and make an intelligent choice; waive the testing.</p>
33	1/25/2021	Primary Stakeholder Group	Yes	<p>Proposed action not to test grades 3-8 ELA and math in 2021 must be examined very carefully. These tests continue to serve a critical purpose in the education of our students. Eliminating the pressures of accountability requirement for the next two years would make sense; this would support teachers and administrators to place all their effort on student improvement.</p> <p>A second year in which NYS testing would be eliminated will curtail focused, student improvement initiatives. Having worked with NYS assessments with teachers for many years, we experienced the immense value of the testing results as the basis for improvement strategies and interventions. Without the availability of NYS testing results in 2021, it would be impossible for teachers and administrator to acquire a common "baseline" from which to initiate student improvement in ELA and math, particularly in the new school year. While teachers and administrators are working against incredible challenges, they are not in a position to obtain results comparable to those provided by NYS testing.</p> <p>NYS testing results in the spring of each year become the basis for determining student challenges in the current year and placement in the subsequent. In addition, the testing will attest to the impact of the various approaches schools have undertaken, from virtual to in-person, during the COVID pandemic. One way or another, schools may be compelled to seek outside testing companies to fill this void. That would be costly and unfortunate. Also, when asked, "What do we tell parents about the learning status of their child or children?" At some point the truth will surface; it is better to know now, than to wait.</p> <p>Finally, the Board may wish to consider other testing options. With the advent of vaccinations to bring the virus under control, the options of testing ELA and math in June or September would make sense. The tests are ready to be used. Also, I offer my expertise to share with the Board the myriad testing reports that display the types of baseline, student information and data for our educators to work wisely in this most difficult time.</p>

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34	1/25/2021	District personnel	Yes	<p>Thank you for the inclusion of waiving student attendance.</p> <p>It is completely unfair to small city school districts that in a normal year, experience mobility, to be held accountable for chronic attendance for the 2020-2021 school year. It impacts districts who have receivership schools, and can impact overall accountability. Here are a few facts that make using student attendance an inequitable metric:</p> <ul style="list-style-type: none"> <li>• We have far too many students who are learning full-remote, and then living in other areas of the state or nation, signing in once in a while to engage in instruction. In some instances, when we are able to confirm that they have moved, they are dis-enrolled. However, by the time this all happens, their absences place them on the chronic absentee list.</li> <li>• We also have students that are ill or quarantined because of COVID and miss school due to illness, placing them on the chronic absentee list. This is unfair during a pandemic.</li> <li>• District are setting up their own rules around what constitutes being present when learning remotely. This creates an inherent inequity between district, making the attendance data an ineffective measure for accountability.</li> </ul> <p>Again, I very much appreciate your inclusion of this factor being waived for the 2020-2021 academic year.</p>
35	1/25/2021	School staff	Yes	<p>My name is [REDACTED] and I teach high school science at [REDACTED]. I am writing in support of the New York State Education Department's petition to waive state testing requirements for the 2020-2021 school year. In a time where students, teachers, and families have been primarily focused on survival, it seems imprudent to mandate state-wide testing at the elementary, middle, or high school levels.</p> <p>Speaking from my experience at the high school level, students have regularly been shuttled in and out of the school building due to quarantine and isolation protocols. Many of my students (currently over 50%) have elected to learn entirely remotely due to COVID-19 infection concerns and due to a need to care for younger siblings while parents work. While I and other teachers have worked tirelessly to provide a solid educational framework for students amidst this chaos, I find it presumptuous to assume that all students will have received a normal, equitable education this year. There is collective trauma being processed by students and adults alike.</p> <p>On top of this, simply logistically, there are students and families who would find it preposterous to place their child in danger of COVID-19 infection to take an in-person exam this spring. Our students need mask breaks to be comfortable, which would be an organizational and security nightmare for exam proctors. In-person exams put teachers and students at risk of prolonged contact with potentially infected individuals. The mask quality</p>



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				<p>available to most students and teachers would not necessarily prevent infection if virus particles are circulated in a room for multiple hours.</p> <p>While my particular school is lucky enough to have 1:1 Chromebooks for students and the vast majority of students have reliable internet at home, I know that is absolutely not the case for students across the state, which could have deep and unfair ramifications for school and student evaluations.</p> <p>Teachers know their students and their abilities best. Teachers are fighting day and night to help students achieve their highest potential test or no test. I hope that common decency and educational equity prevails here to protect students' and teachers' physical and mental health.</p> <p>Thank you very much for your time and consideration.</p>
36	1/25/2021	Parent	Yes	<p>State testing should be waived this year, as it will only add to the stress levels of children trying to learn under extremely difficult and varied circumstances.</p> <p>Our daughter has been virtual since last March. While she has maintained her grades, it has been difficult for her to get help and impossible to engage with her teachers. She is lonely and misses the social aspect of school, but with parents with conditions that make us more likely to have a negative outcome from COVID, in person could not be a choice.</p> <p>Anything that adds to the stress of this situation and follows a child for their entire school career - and high stakes testing is certainly that - needs to be avoid, if not because of the disparity of learning situation will certainly skew the outcomes, then out of kindness and empathy.</p>
37	1/25/2021	District personnel	Yes	<p>I have been an educator for over 37 years. I am currently a superintendent. The challenges of virtual/hybrid learning have been monumental. As hardworking as our teachers are each and everyday, virtual and hybrid learning does not take the place of in-person learning. I respectfully ask the State Education Department and Board of Regents to seriously consider waiving state testing this year. Thank you.</p>
38	1/25/2021	School staff	Yes	<p>T Working in a school where we are teaching students remotely and in person, there is just no way to allow students a standard education. These tests that are offered in traditional years do not fit our unprecedented times. As much as educators want to provide equal education for all students, there are too many variables this year, whether the students are in person or learning from home. On top of this, there are students who have to temporarily quarantine at home during this school year. They are not established in a routine for online instruction, but thrown into it with less structure and guidance at home than the students' whose parents signed up for the remote only option.</p> <p>There is no way any standardized testing could be fair in this unprecedented time. It will just add more stress to</p>

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				the teachers and students, as well as the parents. The results will not prove anything, as the data will be inconsistent from district to district and town to town.
39	1/25/2021	School staff	Yes	<p>Good afternoon, my name is [REDACTED] and I am a retired teacher and school administrator, currently serving as [REDACTED]. Throughout my career I have supported the purpose and information yielded by the annual Grade 3-8 assessments as I believe they provided important information about student progress. I am sensitive to the importance of data, particularly as it impacts marginalized communities. Given the realities of the pandemic, the difficulties faced by students, families and staff I do not believe administration of these exams would serve a valid purpose this year. Despite heroic efforts by school districts and staff to provide in-person and remote instruction this has been a year that has yielded massive interruption to consistent instruction. I would instead recommend that districts administer benchmarks and formative assessments to students. Additionally, it seems there will need to be comprehensive discussion as to "grade level expectations" and potentially a shift in the standards for each grade level. While the pandemic has caused great interruption to so much of what is familiar I believe there is great potential to further explore what student achievement and success truly looks like. I believe maintaining the Grades 3-8 assessments will induce additional anxiety for all stakeholders and should not occur this year.</p>
40	1/25/2021	School staff	Yes	<p>I fully support the Department pursuing waivers for testing for the 2020-2021 school year.</p> <p>The 2020-2021 school year has presented tremendous challenges to our high school. To ensure student safety through proper social distancing, we have had to adopt a hybrid schedule. Having students in-person, partially remote, and fully remote has created major hurdles for our instructional staff as they figure out proper pacing, asynchronous vs. synchronous instruction, methods for maintaining student engagement, and the best methods for assessing student learning. As expected, this new environment forces teachers to slow down their pace of instruction and therefore limits the amount of curriculum that can be covered. For example, a classroom teacher now has to clean the classroom between classes, focus on developing and maintaining relationships and connections with students that never have in-person classes, adapt to student populations that change rapidly due to Covid-19 situations, and instruct in a hybrid environment that is not as effective as an in-person class.</p> <p>As school administrators, we have accepted that we cannot replicate what is done in a normal school year. We have prioritized certain concepts and skills and we have changed our assessment methods. In our conversations with our staff, we understand that a significant stressor is the expectation that the State will expect them to maintain the same amount of curriculum coverage as they would during a normal school year and prepare students for standardized testing. This stress is then applied to students as they struggle to keep pace in a virtual world.</p>

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				<p>Waiving the testing requirement for this school year will allow teachers to focus on teaching and learning of the most essential concepts. It will also reduce the stress and anxiety being expressed by our student population that is feeling overwhelmed by the current health crisis.</p> <p>I appreciate your efforts in pursuing this waiver.</p>
41	1/25/2021	School staff	Yes	It would be of no benefit to administer state tests this year. As it stands, we are teaching more slowly than we would otherwise, and teaching students for learning and mastery. Furthermore, it would be detrimental to lose good teaching days to testing days. Lastly, many of our children are learning remotely; testing remotely is not a viable option.
42	1/25/2021	School staff	Yes	<p>I read the the draft test waiver request and rationale this afternoon from SED to the US-DOE. I agree wholeheartedly.</p> <p>It's not possible to implement the testing program this spring with any integrity or fidelity.</p> <p>It would be very unfair to our middle schoolers. In fact, it would create needless anxiety among my students at a time when we are trying to help students feel calm, care for and connected to school.</p>
43	1/25/2021	School staff	Yes	You can't realistically expect children to perform on standardized tests in the middle of a pandemic. Please strongly consider canceling these tests another year. No one wins if you force student and staff to take these stressful tests with no implications.
44	1/25/2021	Teacher	Yes	<p>In light of the ongoing pandemic, and the fact that I desire my students to have safe, equitable and fairly administered testing, I do not feel our students should be tested or administered a score level this school year.</p> <p>In our class, we are working very hard, yet every student still does not have the same learning experience - due to hybrid and remote learning and other home factors that are contributing to their learning this year. They are all clearly moving along a learning curve, but one that is vastly different than ever experienced before. We do not have the ability to test in a safe, equitable or fairly administered setting. I am not at all comfortable with putting more on them or their families, and after speaking to some families directly, feel that many would just opt out this year if testing were pursued.</p> <p>I thank you for considering the two waivers this year, and hope that the final decision can be made and shared in a quick manner.</p>
45	1/25/2021	Teacher	Yes	I am a veteran [REDACTED] public school educator and parent of a [REDACTED] public school student. I echo Chancellor Young Jr.'s statements that "The ongoing and at times rapidly worsening COVID-19 pandemic has... caused enormous economic and emotional insecurity for our students and their families and made the task of safely educating our

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				<p>students immensely more challenging", and that "Instructional time should be “focused on supporting students in academics as well as social-emotional health” .</p> <p>Students, families and teachers/school staff are traumatized by this pandemic and the economic situation. There is no place for standardized/high stakes testing at this time. Please cancel high stakes testing for this school year.</p>
46	1/25/2021	School staff	Yes	<p>I’m writing in support of the waiver on state tests this year ‘20-’21. If ever there was a need for teachers to be able to individualize their teaching and be flexible in their curriculum, it is during a pandemic! Students and families will be grateful, my family certainly will be. My son attends [REDACTED]</p>
47	1/25/2021	Teacher	Yes	<p>Hello. My name is [REDACTED]. I teach [REDACTED]</p> <p>[REDACTED]</p> <p>This has certainly been a difficult year. I am currently teaching in the hybrid model--half of my class comes Monday/Thursday and the other half on Tuesday/Friday. While I am glad we have at least some student contact, and while I work very hard to give my students substantive assignments for their home days, I can say with absolute assurance that my students are not learning everything they would have during a normal year. There just aren't enough hours in 2 days to address all the individual needs of my students. Exactly half of the math curriculum is being "taught" by a website. There are several students in my class who, for a variety of reasons, are not completing all of the home assignments or, even if they are, still need more direct teaching in the classroom to fully grasp all the new strategies and skills in the curriculum.</p> <p>For this reason alone, I believe NY State should forego testing this year.</p>
48	1/25/2021	Teacher	Yes	<p>Greetings, in response to the waiver of State testing requirements for the Spring and June administration of 3-8 tests and Regents Exams, I am in full support of such waiver. As a 25 year HS Special Education teacher I see the impact of the inequity and missed educational opportunities that have been impacted during this pandemic. It would not be a fair and accurate assessment of students’ learning when they haven’t had a typical school year by any means. As diligently as districts, administrators, teachers and students have tried to work thru all of the daily issues that arise during remote or hybrid learning, it just isn’t fair!</p> <p>I am also a Board of Education member at a neighboring school district to where I teach. I know the long term impacts that standardized tests under these circumstances will have for districts. There is nothing “standardized” about education during a Global pandemic and a waiver at this time only makes sense to me!</p>
49	1/25/2021	School staff	Yes	<p>As a reading specialist, I support testing that provides educators with information that can enhance our ability to serve our students and better ourselves as professionals. However, this year, due to the pandemic, I feel testing our students this spring would not help us. The students have not had the same academic learning opportunities this year as they have in the past. Testing would put undue burden on them at a time when we are trying to care for them in ways we have not had to emotionally and physically before this pandemic. Our school</p>

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				days look different across our state. We do not have the means to standardize the administration of these tests to make it equitable for all. The stress of these tests on any other given year is a lot for our students; this year it would just be cruel. We do not need a measure of accountability, we need everyone's support at the federal and state levels to ensure that this pandemic truly does not leave our children with deficits that we can not help them overcome. We need resources not tests.
50	1/25/2021	Parent	Yes	As a parent of a NYS school student in 7th grade I am in favor of forgoing any state assessment of students this 2020-21 school year. These kids are at a definite disadvantage trying to learn remotely and even more disadvantaged in a hybrid situation.
51	1/25/2021	Parent	Yes	I wanted to send an email thanking you for consideration over possibly waiving state testing this year in NY. We sent our son to school, and his school and teacher have made fourth from grade the best it could possibly be. However, the loss of the freedom to be a child, the loss of life, and the upheaval for our family has been a lot to bear for him for us as a family. He has expressed stress over the upcoming elementary state tests, and as his mother I wanted to express my gratitude at your foresight over the possible plan to cancel them. Thank you. One less stress on him would be healthy, and the school report card and assessments already give us a great insight into where he is as a learner. Today, he came home happy and smiling from school. He is learning. He is seeing peers, and that for this mother was a beautiful thing to see. That for this mother is all I can ask of this year and from you.
52	1/25/2021	Parent	Yes	My name is [REDACTED] and I am a parent of an elementary school student in [REDACTED] I am asking that you continue to waive the Regents testing in NYS. This school year has been very challenging in more ways then one. Thank you.
53	1/25/2021	Parent	Yes	As my daughter, [REDACTED] and since I am concerned about her safety during the state exams I am requesting as stated below. In light of the ongoing pandemic, Spring 2021 state assessments cannot be safely, equitably and fairly administered to students in schools across the state and, therefore, I request to seek these waivers.
54	1/25/2021	Parent	Yes	I feel that the hybrid model of education did not prepare students adequately to take state exams. My son has an IEP and it has been a huge challenge for him to receive the services that he needs in a virtual mode. I do not fault the school, but I do not feel he has been prepared to take a standardized state assessments.
55	1/25/2021	Superintendent	Yes	Thank you for the opportunity to provide feedback regarding the waiver of 3-8 and Regents Math and ELA testing. I know that my viewpoint will be in the minority of the comments you will receive. I believe that NYS should give the 3-8 exams and Regents exams. I believe the following will happen if we do not give these exams: Learning gaps for all students (black, brown, white, etc.) will continue to grow for economically disadvantages students <ul style="list-style-type: none"> <li>• Learning gaps will increase for students with disabilities and English Language Learners</li> </ul>

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				<ul style="list-style-type: none"> <li>Teachers will be given a free pass on learning for the second year which impacts the learning potential of ALL students (That is, once teachers know there are no exams, they will stop teaching to the level needed to prepare students for the next grade level or course)</li> <li>School districts/teachers will not know where students have learning gaps</li> <li>██████ will argue in 21-22 that 3-8 and Regents exams cannot be used as an indicator in teacher evaluations because students have not take these exams in the past two years. If they are used, they will file a lawsuit.</li> <li>Will need to delay the next gen standard tests until students have an opportunity to be in person for one year prior to administering</li> <li>Increase the deficit of instruction between in person and virtual/remote learners</li> <li>Missing valuable data to compare in person vs virtual/remote learning (some schools have provided in person learning from the start of the school year)</li> <li>School districts will face lawsuits for not providing education as required, especially in urban areas</li> </ul> <p>The lack of standardized testing prior NCLB showed tremendous achievement gaps for economically disadvantaged, students with disabilities, English Language Learners, and minority students. We have a moral and ethical obligation to ensure these gaps do not reappear. The biggest pushback is from teachers who do not want their teaching measured based on their students performance on state exams. However, this is the only consistent measure we have to ensure that students are meeting set standards at their grade level.</p>
56	1/25/2021	District personnel	Yes	<p>Bravo!! As a leader in a district where the pandemic has exacerbated the inequities our disadvantaged students already face - from technology access, to food security, to adequate health care, to increased exposure to the virus itself - on top of the heightened sense of racial injustice that has further traumatized our black and brown students, I applaud NYSED's request for a waiver from mandated assessments. With the exception of our self-contained Special Education students, students in grades 7-12 have not stepped foot on our campuses for in-person instruction due to the budget deficit that cost us 221 employees three weeks into the school year after facing deep cuts the previous spring. We are a district who needed more resources to support our vulnerable students and their families during this crisis, not less. We don't need a test to tell us what we already know - that we need to keep fighting with everything we have to give our kids the education they deserve. Thank you.</p>
57	1/25/2021	Teacher	Yes	<p>As a 6th grade teacher, I feel these tests need to take a backseat to what we are doing this year. I currently teach students who are in-person everyday and a group of fully remote students. Any time I have to engage these students is incredibly valuable. I do not want to give up valuable time with my students to administer the state tests for ELA and math. At a minimum, we lose 4 teaching days. Children who are quarantined will have to make up the tests which means after being out for a number of days, they will miss more valuable time with their teachers and peers because they will be testing. I am also unsure of how to administer the test to students who are fully remote. Furthermore, I cannot imagine having to leave my classroom to grade the state tests. This</p>

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				<p>would put a group of people together in a room, and I know all safety measures would be taken, but as we all know there are no guarantees right now.</p> <p>Another issue is that these are standardized tests and instruction across the state has been anything but standardized this year. It seems unfair to administer and use the results of a test being given to students in such various circumstances - some districts have been delivering fully remote instruction for months, while others have been able to have students in person daily. And, as I stated above, most districts have a combination of kids who attend in-person and kids whose parents chose a fully remote option.</p> <p>Last but not least, I feel like we have made progress with parents over the past few years. Our district started to see a decline in the number of students opting out of the state tests. I fear parents who have been on the fence when it comes to state tests would be swayed by the current school stressors and may lean towards again opting out. I would hate to see the opt out numbers begin to rise. Thank you for all of the attention that you are giving to this decision.</p>
58	1/25/2021	Not specified	Yes	As a retired elementary educator, I know the amount of work on behalf of students and educators the state tests involve in order to prepare students for yearly state testing. Covid19 has really made it difficult to assess with and certainty student growth. Many students are lacking support at home with their remote lessons. Also many are still lacking remote access. Please seriously consider cancelling state testing for this spring and possibly until students have been able to attend school, in person, for at least one year. A majority of students are going to be far behind and need time to catch up. Thank you
59	1/25/2021	Parent	Yes	I am the parent of a [REDACTED] public school student and a [REDACTED] public high school graduate. I always found the NCLB/ESSA-mandated state tests to have almost no value in measuring my children's learning and were a poor instrument to measure any aspect of education, whether student, teacher, school, or district. The pandemic makes the tests even less worthwhile. I support pursuing a waiver of all ESSA-mandated testing and ESSA-mandated "accountability."
60	1/26/2021	Not specified	Yes	I hope the state and commissioner will consider waiving the state testing this year. My students have been working in less than ideal situations. From verbal abusive situations to lack of internet and parent support as well as million other situations, it is unfair to test our students given the virtual conditions some of them are in. Some students aren't even logging in and attending classes. Please consider the waiver.
61	1/26/2021	Teacher	Yes	As a NYS educator for the past 25 + years, I have seen many situations come and go but at the forefront is my students mental and emotional well-being. Right now in the midst of this pandemic, the children are loving the routine's and whatever consistency we can give them now that we are back in school. That being said, I have had multiple student ask me in worry, are we going to have to take the state tests? With being remote for 3 months at the end of last year and this year being hybrid with students learning from grandparents home, daycare centers, in their parents workplace and some, learning alone at home because their parents are first responders, taking the stress and anxiety of the state test away would allow the youth of our community to focus on what



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				<p>really matters and us teachers to focus on what really matters, the students mental and emotional well-being. I of course am doing whatever I can to love, inspire, encourage, care for, and educate each and every day. The number of children having to quarantine on and off due to exposure or family members having Covid-19, this is out of our hands and it is not equitable to test students this year when everything about this year is inconsistent and all of us are trying to do what is best for the children and their families all while trying to care for our own families. The above also applies for the schools who are required to report for their accountability for improving and making progress.</p> <p>Simply, please let us do our job to create a stable and loving environment so that our children can come to a safe place each day and start to rebuild their relationships, skills and routines in school which have been on hold since almost a year ago. I respectfully request the approval of the proposed federal Waivers for State Assessments and Accountability requirements. Thank you for your time and consideration of this urgent matter. The sooner the better for the children's sake. THANK YOU IN ADVANCE.</p>
62	1/25/2021	Parent	Yes	As a mom of a 6th grader and 9th grader who both are doing well academically I feel this is a safe judgement call because this year has been so abdnormall. I am not one who believes in testing children as often as NYS does anyway as there are some children that do not do well on test and NYS does not take this into consideration. I have found that these test can a lot of stress. Thank you for helping in an even more stressful time.
63	1/25/2021	Parent	Yes	As a parent of a 2nd and 4th grader I think all students should start fall class in the grade they are in to insure that they understand what they are trying to learn this year. We have worked diligently with our daughters but am not comfortable with the remote learning technic. If you graduate at 18 or 19 so be it in this time
64	1/25/2021	Parent	No	As a mother of 2 children in the hybrid learning model at their school grades 3 and 5 subjected to the state testing, I would like to express my concern over the cancellation of state testing. My children SHOULD be tested to show the absolute failure that remote learning is. Their report cards have gone from straight A's (or 4's) to failing or "not meeting grade level expectations". It is unfair to my children that their school days end at noon when they are craving more instruction. The education system is FAILING my children and all children for that matter! They deserve to be tested to show its not them its the lack of effort put in or being required by their teachers because every one has become so lax due to COVID. Suddenly it is ok for school days to end at noon? No, test these children! Send them to school all Summer if you have to our future depends on it!!! If my children can be given failing grades on their report cards when they put their heart and soul into this online school thing then the school or education department deserves to have failing grades on their reports as well! Be fair test these children unless your afraid to see the results!



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65	1/25/2021	Principal	No	<p>I would like the testing to continue in 3-8 without issue/accountability to the district, building, principal or teacher. I would like the test results to check on the progress of students and the program during this COVID period, including the shutdown in March 2020. I think the testing is critical for the identification of AIS needs in 21-22. The testing will especially help guide decisions on the support for students with larger gaps than anticipated. It may also provide light on better than anticipated progress made by students. A vast majority of my students are seemingly maintaining their anticipated progress (internal measures), but I find it more valuable to have a pool to compare ourselves to statewide with the NYS Assessments. Finally, I think the administration establishes a fair and reasonable base to create appropriate growth scores in 21-22.</p> <p>The only way to find out how we are doing in this unique time is to administer the tests and to have schools use the data to create more accurate decisions.</p>
66	1/25/2021	School staff	No	<p>I feel that all students need to take the regents exams regardless of COVID because they are a valuable resource for the students who drop out of school. Regents counts towards the HSE. If anything, maybe lower the threshold for passing to a 50 regardless of an IEP. This gives them a better chance of obtaining a credential to go into the military, a trade or higher education. Please have students take the exams. They are too valuable.</p>
67	1/25/2021	Not specified	No	<p>I am writing to comment on the above referenced request from the New York State department of Education to waive required student testing this school year. As a parent of 2 public school students in New York State, and as a taxpayer of school district taxes, I object strongly to this request. Since the beginning of the pandemic, the state has continuously made decisions which adversely affected the quality of education available to my children and the others in our school district. Their request to waive testing seems mainly aimed at avoiding accountability for these decisions by denying the public of the evidence of just how badly affected our children have been. They seem to misunderstand the point of the testing and the data which is collected from it. The point of the tests is to quantify for the benefit of the various stakeholders how much our children are learning, both as individual students and collectively as a population of students. While it seems likely that the results will not look good compared to previous years if the tests are taken, the data would be helpful by pointing the way toward addressing the deficiencies which have developed over the past year.</p> <p>This request from NYS Ed is at best a childish attempt to cover our collective eyes and pretend that if we can't see the problem, it doesn't exist. Please do not enable this ridiculous behavior, and instead encourage the State to face up to the problems they have in part created so that we may work together to solve them for the benefit of all of our children.</p>

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68	1/25/2021	Other	No	As a former educator, I feel it is important to continue statewide testing this school year. The decision to close in person education in NYS was a foolish one. Too even pretend that a virtual education is possible, was a joke. Testing must be continued this year, to point out how impossible it is, to educate virtually. To educate virtually requires a highly motivated, and above average, student-with internet devices connected to a high speed internet wifi. The results of the testing should really show the lack of concern by political leaders for education in NYS. Thank you for allowing me to vent my frustration., but almost a year of education is now missing from millions of young people in NYS .
69	1/25/2021	Other	No	Please do not vote to get rid of state tests for NYC public schools. We know that the children have fallen behind but we need to know how much. I'm a pediatrician and I know that proper treatment is impossible without a correct diagnosis. We need to know how far behind our children have fallen during this awful year. Please do not close your eyes. The tests are a messenger and it is never wise to shoot the messenger of bad news,
70	1/26/2021	Not specified	Yes	Please consider waiving this school year's state testing requirements. To test students this year would be unfair to not only all the students affected by the pandemic but also to their instructors. Students are struggling and to heap the NYS testing requirements on these young people is not only unfair and not educationally sound but it will contribute to the mental health crisis that we are seeing with young people caused by the pandemic and all its repercussions.
71	1/26/2021	Not specified	Yes	I support the waiver for all testing on elementary, middle and High school students.
72	1/26/2021	Teacher	Yes	<p>I am a public school teacher and I am concerned about testing for Spring 2021. Considering the chancellor of regents own words reported on chalkbeat 1/25/2021 administering these tests at all seems unsafe. He said,</p> <p>"Board of Regents Chancellor Lester Young Jr. said tests “cannot be safely, equitably and fairly administered” this year.</p> <p>“The ongoing and at times rapidly worsening COVID-19 pandemic has also caused enormous economic and emotional insecurity for our students and their families and made the task of safely educating our students immensely more challenging”</p> <p>"Instructional time should be “focused on supporting students in academics as well as social-emotional health” rather than administering exams."</p> <p>Quotes from: <a href="https://ny.chalkbeat.org/2021/1/25/22248690/new-york-education-officials-call-for-cancelling-state-tests">https://ny.chalkbeat.org/2021/1/25/22248690/new-york-education-officials-call-for-cancelling-state-tests</a></p>

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				The responsible thing to do would be to cancel these exams. Other states don't even take them and they have little bearing on college acceptance.
73	1/26/2021	Superintendent	Yes	<p>First, I applaud NYSED for being proactive in requesting a waiver of NYS assessments and more importantly the accountability measures associated with the tests. If a large percentage of students were in school, I would have requested that we consider providing a modified version of the State assessments to measure a baseline of achievement across the State without an accountability measures associated with the results. However, since many districts, including ours, have the majority of their students in full virtual learning due to parent's choice, this would not be feasible.</p> <p>Rationale: I applaud my colleagues who lead districts where they had the financial resources and space to provide their elementary students five days of in-person instruction. Due to funding and space issues, we could simply not afford to accomplish this task for all Pre-K to grade 5 students. Therefore, our students have experienced the following:</p> <ul style="list-style-type: none"> <li>• Hybrid model where most in-person learning was two days per week and three days of virtual learning since late September</li> <li>• A large and growing percentage of parents who have chosen full-virtual learning due to health reasons, fear of the virus, loss of family members and consistently rising COVID-19 rates in our community</li> <li>• At one point, our small urban district had the highest positivity rate of those tested in the State</li> <li>• Communities with black and brown children have been disproportionately affected by COVID creating greater concern for in-person learning</li> <li>• While we moved to a one-to-one model of providing all students with a computing device, we continue to await the delivery of chromebooks for our youngest learners despite a summer order</li> <li>• Many of our families cannot afford computing devices for each of their children and highspeed wifi</li> <li>• Our community raised over \$40,000 to help provide our children with MiFi and other devices</li> <li>• Unfortunately, we learned that simply providing our families with a chromebook and personal MiFi devices did not automatically result in equal access to online instruction.</li> <li>• We learned that daycares, sitters and family members did not have the ability to provide access to online learning for various reasons</li> <li>• This resulted in many children losing out on foundational academic instruction (e.g., no knowledge of how to log younger students on to the Google platform; managing schedules of multiple children, etc.)</li> <li>• Due to our communities surge in rates, we decided to engage in full-remote learning for all students from mid-November to mid-January. Unfortunately, many children were unable to log in to our classes due to the aforementioned reasons.</li> </ul>

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				<ul style="list-style-type: none"> <li>Our internal data indicate that an alarming percentage of students have experienced learning loss since March 2020; have not been able to consistently engage in learning resulting in failing grades; and attendance rates have been significantly impacted.</li> </ul> <p>Given these realities, State assessments this year will assess few in-person students and will not provide for a fair and just accountability measure based on varying access to learning and attendance. Our District is an example of extraordinary Board trustees, leaders, teachers and staff who have risen and exceeded the demands of a health pandemic. Our children have overwhelmingly done all that they can to cope with the familial, health, economic and educational realities that have disproportionately impacted their lives in significant ways. Our children have not had equitable access to in-person learning as the peers in more affluent communities have been able to receive.</p> <p>Therefore, I support the cancellation of State assessments this year and employ the State and Federal leaders to engage stakeholders in true dialogue about accountability moving forward. We must rethink how we identify schools as "failing"; measure growth for students who are faced with poverty, English language learner needs, special needs, arrive to our country after early elementary grades; and accurately assess achievement that fairly represents these differences. I would be honored to serve as one of many voices representing diverse urban communities. Thank you for your advocacy and for a mindful focus on equity.</p>
74	1/26/2021	Teacher	Yes	<p>My name is [REDACTED]. I have been teaching for 24 years and I currently teach all AP level courses. My students would be subjected to the US History and Government Regents exam. I would hope that the state considers not requiring this exam due to the situation we are in. I have students who are in half the time and some who are full remote. My level students are struggling to keep up with everything and they are some of the top students of the school. I can only imagine what this is doing to a special education student or a student who has not been in the classroom since March.</p> <p>There are many other ways that we as teachers can assess our students knowledge. This has been a very difficult year for everyone and I really hope there is consideration to exempt these students from all Regents exams this year.</p>
75	1/26/2021	Teacher	Yes	<p>As a veteran Social Studies teacher who has been administering and assessing both the United States History and Government and Global History and Geography Regents exams since 1998, I strongly encourage the state to apply for a federal waiver this spring and to cancel the administration of all state assessments. Given the stress this pandemic has caused students, teachers, staff, administration and parents, they would be an unnecessary additional stressor. Further, given the equalities that exist across NYS in access to quality remote instruction, the exams would be inherently unfair to our most economically vulnerable students. I would also feel extremely</p>

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				uncomfortable gathering with teachers from other districts to grade the exams. Thank you for your time and consideration.
76	1/26/2021	Not specified	Yes	I agree that testing and accountability should be waived this year given the frequent disruptions to instruction with remote learning and closures.
77	1/26/2021	Superintendent	Yes	Due to the nature of COVID 19 and our difficulties in broadband, student access and intermittent remote learning interruptions our students would be at a severe disadvantage to others. Our students are under tremendous pressure and standardised tests would be another blow by adults to their already fragile world.
78	1/26/2021	Superintendent	Yes	I am writing to ask that you strongly consider waiving all Federal Assessments this school year. In [REDACTED] we are using NYSED approved i-Ready Diagnostic Assessments in ELA and Math to measure the achievement of our students, identify their gaps in learning so we can target and laser instruction to help the student close those gaps.
79	1/26/2021	Superintendent	Yes	I fully support the waiver that New York State is seeking to waive the state testing requirements at the elementary school level for this year based upon all of the reasons you have listed. Thank you very much for looking out for the best interests of our students, who have had quite a challenging year for the 20-21 school year.
80	1/26/2021	Teacher	Yes	State testing for the 2020-2021 school-year should not occur. Based on inconsistent efforts from students' varying and challenging homelife it seems to further separate students, especially on their potential academic strengths in ELA and Math. Technology, instability, personal choices/beliefs about the pandemic, lack of self-motivation are just a few reasons to reconsider making all students accountable for expected growth in a less than normal year and a half of public education.
81	1/26/2021	Principal	Yes	<p>Due to the current climate of COVID, the students have not been able to prepare for the NYS tests as they have in the past. There are gaps in learning that need to be addressed before the students take these types of assessments.</p> <p>We need to be concerned about the students' mental health, the students are not mentally prepared for the NYS tests.</p> <p>Thank you of your consideration in waiting the NYS tests in 2021-2022 school year rather than 2020-2021.</p>
82	1/26/2021	Teacher	Yes	I am responding to the draft legislation for the Request for a Waiver of Statutory and Regulatory Requirements of the Elementary and Secondary Education Act (ESEA) on behalf of all LEAs in New York State. It is imperative that each child no matter the level of achievement be given the opportunity to "test " at the optimum level that they can. For many of our students with multiple disabilities (in the high risk category for COVID-19) many parents have decided on remote learning to keep their children safe, limited face to face instruction within the classroom

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				<p>due to increasing COVID -19 upticks and school closures have not allowed the time needed to master the concepts that are required for the Alternative Assessments for NYS.</p> <p>It is in the best interest of all students that all testing be postponed for the school year of 2020-2021.</p>
83	1/26/2021	School administrator	Yes	<p>Since the NAEP has been cancelled due to the pandemic's impact on learning then the NYS 3-8 assessments should be cancelled. The 3-8 data would most likely be inconclusive. Furthermore, since teachers are not allowed to see the questions and how their students answered them, it is a missed opportunity to look closer at what our students' truly understand/know. The NAEP would have given us a better sense of how COVID-19 has impacted our students across our country.</p>
84	1/26/2021	School staff	Yes	<p>I am in favor of the proposed federal waivers for state assessments and accountability requirements. Due to the COVID-19 pandemic, we are one of many schools operating in a hybrid model of instruction. In addition, we have parents opting for their child to receive instruction as a fully remote student. That, combined with the social distancing and capacity issues resulting from COVID-19, would make it extremely difficult to implement the NYS Assessments fully in-person under the set time constraints and testing requirements. Furthermore, it would be impossible for our district to test all students in person as we normally would be expected to do because of our fully remote population.</p> <p>We thank you for recognizing the challenges presented by the COVID-19 pandemic and we appreciate that you are willing to put the safety, health and well-being of our students and teachers at the forefront of your decision-making process. It means a lot to us that you recognize the real struggle that school districts and families are facing during this worldwide health crisis.</p>
85	1/26/2021	District personnel	Yes	<p>Thank you for seeking a waiver for state testing in Spring 2021, I am in full agreement. The pandemic has had devastating effects in New York City where our nonpublic schools are located in [REDACTED].</p> <p>Students, parents, teachers and school principals are all very concerned on the negative impact state testing will have on students due to the emotional toll the pandemic has taken and the variety of learning models currently being used.</p> <p>I appreciate the fact that The New York State Education Department is concerned as well and hope the waivers will be accepted.</p>
86	1/26/2021	Teacher	Yes	<p>Hello and thank you for trying to sort this whole mess out. Your work is appreciated! My name is [REDACTED] and I have taught high school math for 29 years. I am currently at [REDACTED].</p>

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				<p>I am very proud of the hybrid system my district has in place. We have an incredible tech department. Every single student in our entire district has a tablet/computer to take home. We have virtually no discipline problems in our high school at all. Our students, on the whole, work pretty hard.</p> <p>Even with all of this working for us I am so far behind where I would be during a "normal" school year. I would imagine that most schools are even farther behind then we are. We have set new goals here at our school based upon what our resources are and what are students are able to accomplish in our new hybrid model.</p> <p>I think having the regents at the end of the year to set consistent standards across the state is a very good idea, but that's impossible to do fairly with the inequity in our service to our students based on the limitations the Corona virus has placed on us.</p> <p>Crazy times, but eventually it will all work out!</p>
87	1/26/2021	School staff	Yes	<p>The ongoing and at times rapidly worsening COVID-19 pandemic has also caused enormous economic and emotional insecurity for our students and their families and made the task of safely educating our students immensely more challenging.</p> <p>All standardized tests should be cancelled this spring</p>
88	1/26/2021	Not specified	Yes	<p>We need a waiver for all ESSA requirements this school year, including 3-8 state tests. Students who are economically disadvantaged have lost more learning than those from high income homes. The disproportionality is shocking. For instance, many students from poverty have lost several years on their reading scores. Please waive the tests this year.</p>
89	1/26/2021	Teacher	Yes	<p>I commend my colleagues who lead districts where they had the financial resources and space to provide their elementary students five days of in-person instruction. Due to funding and space issues, we could simply not afford to accomplish this task for all Pre-K to grade 5 students. Therefore, our students have experienced the following:</p> <p>Hybrid model where most in-person learning was two days per week and three days of virtual learning since late September A large and growing percentage of parents who have chosen full-virtual learning due to health reasons; fear of the virus; loss of family members; and consistently rising COVID-19 rates in our community At one point, our small urban district had the highest positivity rate of proportionately to those tested in the State Communities with black and brown children have been disproportionately affected by COVID creating greater concern for in-person learning While we moved to a one-to-one model of providing all students with a computing device, we continue to await the delivery of chromebooks for our youngest learners despite a</p>



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				<p>summer order Many of our families cannot afford computing devices for each of their children and high speed wifi Our community raised over \$40,000 to help provide our children with MiFi and other devices Unfortunately, we learned that simply providing our families with a chromebook and personal MiFi device did not automatically result in equal access to online instruction.</p> <p>We learned that daycares, sitters and family members did not have the ability to provide access to online learning for various reasons (e.g., no knowledge of how to log younger students on to the Google platform; managing schedules of multiple children, etc.) This resulted in many children losing out on foundational academic instruction Due to our communities surge in rates, we decided to engage in full-remote learning for all students from mid-November to mid-January. Unfortunately, many children were unable to log into our classes due to the aforementioned reasons.</p> <p>Our secondary students have experienced isolation, screen fatigue, an overwhelming feeling to keep up with their academics and the tragic loss of two of their peers Our internal data indicate that an alarming percentage of students have experienced learning loss since March 2020; have not been able to consistently engage in learning resulting in failing grades; and attendance rates have been significantly impacted.</p> <p>We have visited homes; used churches as wifi "hubs" and to meet with families; created virtual check-in meetings; and found creative ways to support our students emotionally and academically.</p> <p>Prior to the pandemic, our District's State ELA and Math rates improved by 4 percentage points in ELA and Math and our graduation rate has continued to grow towards our goal of 100%. Our district's rate is 80%; our high school rate is 83%; and the State's average is 85%.</p> <p>Given these realities, State assessments this year will assess a small number of in-person students and will not provide for a fair and just accountability measure based on differential access to learning and attendance amongst all NYS schools. Our District is an example of extraordinary Board trustees, leaders, teachers, staff and community members who have risen and exceeded the demands of a health pandemic.</p> <p>Our children have overwhelmingly done all that they can to cope with the familial, health, economic and educational realities that have disproportionately impacted their lives in significant ways. Our children have not had equitable access to in-person learning as their peers in more affluent communities.</p> <p>Therefore, I support the cancellation of State assessments this year and employ the State and Federal leaders to engage stakeholders in true dialogue about assessment and accountability moving forward. We must rethink how we identify schools as "failing"; measure growth for students who are faced with poverty, English language learner needs, special needs, arrive to our country after early elementary grades; and accurately assess achievement that fairly represents these differences. Districts like [REDACTED] require the funding and resources to provide an equitable education to all of our students. I commend our Chancellor, Interim Commissioner and</p>



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				<p>NYSED staff for leading this effort. I would be honored to serve as one of many voices representing diverse urban communities to find solutions to our present and future challenges. Thank you for your advocacy and for a mindful focus on equity for all.</p>
90	1/26/2021	Principal	Yes	<p>I am writing to voice my opinion as a principal and parent, about State testing during the pandemic. I do not think it is a wise choice to allow schools to administer the tests this Spring. It is already a stressful time in schools with the varying schedules, and teachers trying to fill in the learning gaps from last Spring. To add more stress by expecting teachers to prepare students for a state exam which many students will likely not perform well on is unconscionable. There is also the uncertainty of whether classes will even be in person when the test dates roll around. Testing students at home will cause a number of issues, mainly the validity and possibility of internet disruptions. For schools that have students both in-person and remote there will be an unfair advantage for students testing at home vs. in school. The comparison will then be biased.</p> <p>There are many reasons these exams should not be administered to students in the Spring of 2021, the above being the most prominent. Please consider waiving the administration and/or accountability requirements of the state tests.</p>
91	1/26/2021	School staff	Yes	<p>We all hope to be able to administer the NYSESLAT exam in the spring so that we can schedule our ELL students correctly next year. I appreciate the waiver to keep us from being held accountable for students that are attending virtually and may not be able to take the exam. However, I am very concerned about our ability to administer the full exam (all three books) to our students. Would it be possible to get an ENL level for students that only complete one or two books? In the past, a student that did not complete all three books and the speaking exam was not given a level for the following year. Our district is currently hybrid and the students in grades 7-12 only attend two days per week. This will present serious challenges for administration of the full exam.</p>
92	1/26/2021	School administrator	Yes	<p>I just wanted to write in that I support having the opportunity to waive state assessments this year. I agree that they cannot be safely, equitably, or fairly administered to all students across the state in light of the ongoing pandemic.</p> <p>I would also like to add to please consider giving districts the opportunity to waive them in subsequent years. I supervise mathematics in our district, and it is a content area where one year's learning builds on the learning in the previous year. I realize the Regents exams and 3-8 state assessments will be back at some point, and in normal times I am in full support of state assessments, but at least giving schools a few years to catch up and sort out curriculum gaps due to the pandemic would be very helpful. Thank you for your consideration. Feel free to contact me any time if you would like to discuss further.</p>

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93	1/26/2021	Superintendent	Yes	<p>Thank you for the work that you are doing and for seeking our input regarding the waivers that are being drafted regarding assessments. I wanted to say that I applaud the effort in making it possible for us to assess our English Language Learners, if we are in school for part of the week.</p> <p>As you know, this assessment helps us to ensure that our students are getting the services and support that they need and every school district is different. I understand that many schools have not been live or in-person for some or all of the school year. My school however, has been in session since September 9. My students are willing and ready to take that assessment in the Spring and we would welcome seeing the results. We rely on the data in planning for and supporting our students and for developing our curricular goals for each student as an individual learner. Thank you for attempting to not make it a "one-size-fits-all," as every District is very different these days</p>
94	1/26/2021	Teacher	Yes	<p>I strongly believe that the annual testing requirement should be waived this year and 3-8 and Regents exams should not be administered. The loss of instructional time due to quarantine and remote instruction is substantial. The time we would normally spend reviewing and administering a state assessment is much better spent continuing to cover the curriculum. I feel rather strongly that requiring annual testing will not provide any additional relevant information about where our students are. That locally derived info is sufficient.</p>
95	1/26/2021	Teacher	Yes	<p>In light of the recent news of NYSED seeking a waiver for standardized testing, I fully agree. As a father of two school aged children who have been in school one day a week for most of this year, and as a high school English teacher, I can't imagine putting our kids through the stress of examinations this year.</p> <p>Our chief priority as we approach the second half of the year should be course correcting and putting our efforts towards supporting the social/emotional crisis that too many of our children are enduring. I applaud your waiver request and wish you success in getting the approval.</p>
96	1/26/2021	Principal	Yes	<p>I am in support of the proposed federal waivers for state assessments and accountability requirements for the 2020-2021 school year. I do not believe that we can derive data of any value in the middle of the COVID-19 pandemic. I also believe the assessments may be antithetical to the emotional/mental health and well-being of students and staff at this time.</p>
97	1/26/2021	School staff	Yes	<p>I'm a Guidance Counselor in our middle school. The level of stress, anxiety, confusion and depression for my students dealing with the difficulty of hybrid learning, family hardship and social isolation are off the charts.</p> <p>The idea of adding to their already difficult burden two, multiday NY state assessments seems cruel, if not completely short sighted regarding the efficacy of the results. This is a year like NO other; the layers of complications, stress, learning gaps and logistical challenges are an obvious legitimate reason to waive these</p>

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				<p>exams for students for 20-21.</p> <p>Please use logic and common sense. This is not fair to students, and will only yield skewed results resulting in a waste of time, effort and educational funds.</p>
98	1/26/2021	Teacher	Yes	<p>As a veteran CTE teacher, I am deeply concerned about the Industry Standard Assessment exams being given to my cosmetology students this spring. I don't feel they are fair to our students, who have endured so much, and are struggling daily. I also am concerned for our teachers. This year has presented challenges unheard of. I am struggling daily to keep my head 'above water'. I worry about my own APPR score, which includes my student's assessment grades. PLEASE consider waiving all assessments this year!</p>
99	1/26/2021	School staff	Yes	<p>I am writing based on your desire to not waive the NYSESLAT or assessment for language learners. Quoted below is your paragraph of why to administer the NYSESLAT.</p> <p>If you want to know who to exit, then administer an ONLINE assessment such as LAS LINKS to only those students who teachers recommend as being advanced enough to take it. The 2019 NYSESLAT score for those more advanced students can be used as a guiding tool to decide who should sit for an assessment for exiting the ELL program. Further, teachers are knowledgeable enough of their student's abilities to level students accordingly as "entering, emerging/intermediate, expanding. The testing of ELL students is discriminatory in nature as non-English speaking parents often are not comfortable enough with the system and therefore, do not advocate strongly enough to prevent these long and drawn out tests from being administered. (Notice that every other NYS assessment such as the ELA and Math exam has been reduced to 2 days while the NYSESLAT remains at 3 days. This is simply not acceptable.</p> <p>"For English Language Learners (ELLs), NYSED plans to make its spring 2021 English Language Proficiency (ELP) assessment available for administration to those students who are able to test in-person (while not requiring it for those who cannot safely and fairly participate). This will offer students the opportunity to exit ELL status if appropriate and ensure that the appropriate levels of English as a new language services continue to be provided to students in the upcoming school year. NYSED will work with LEAs to maximize the number of ELL students who can participate in this assessment by exploring test administration policy changes and expansion of the test administration period. Removal of the federal requirements for ELP testing would allow NYSED to offer the most flexibility to LEAs to ensure that students can test to best inform educational programming decisions."</p>

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100	1/26/2021	District personnel	Yes	Due to the circumstances that our schools are dealing with caused by the pandemic, we would ask that you forego testing again this year. Students not being in class fully, not having their normal routines, a lot of mental health issues arising due to the changes, loss of family members, etc. it only seems appropriate to forego the testing as testing would put more pressure on the students.
101	1/26/2021	Teacher	Yes	I teach in [REDACTED] I work with amazing colleagues and administrators, and although we are doing our very best, it is unacceptable for the state to expect our students, staff and parents to endure state testing this year. Trust that we are all making a superhuman effort to teach and learn this year, and waive all state tests. Do your part to remove extra unnecessary stress and anxiety. Our mental health has been taxed past limits this year already.
102	1/26/2021	School staff	Yes	The drafts look great! It would be incredibly unfair to try to test our students with a standardized state-wide test when students have been quarantined, learning remotely, and separated from school throughout the year.
103	1/26/2021	Not specified	Yes	<p>I hope this email is being sent to the correct office to collect comments in regard to the proposed waiver by the Office of Federal Education.</p> <p>First and foremost, I would like to thank the new Secretary of Education for his humanitarianism in this unprecedented time in education. I am so grateful for a leader in the field of education that understands, values and embraces the students, teachers, and families first, before any thought of monetary gain.</p> <p>With that being said my comments on the proposed waiver for the assessments come from 22 years of experience in the field of elementary school education. I have for the most part supported the administration of assessments to our students. I have found the data to be informative and helpful. In normal times we would use the data to assess our students for additional support and services.</p> <p>However, last year and this year have proven to be most challenging for teachers and students. To think of administering an assessment that would provide any valid data amidst such an unlevel playing field would be counterproductive. To take an assessment during this pandemic would be in my opinion an unnecessary cruelty to families, teachers, administration and students adding additional pressure to an untenable situation. would be cruel during this pandemic.</p> <p>In lieu of the data the NYS assessments would provide we are using a progress monitoring tool and other multiple measures of assessment. These are successfully providing our school district with the important and necessary data to ensure we have eyes on our students' progress. While this does not have the capability to</p>

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				<p>compare us to other school districts within the state, it does assist us with national norms. That being said, I believe the word would again be <b>cruel</b> to use any data to compare school districts to one another at this time. Public schools are doing an amazing job, working with budget constraints, reduced instruction time, transportation issues, remote learning....this pandemic is taking its toll on our resilience and fortitude...why subject the schools to more pressure and anxiety.</p> <p>We are all in the same boat, every school, let us do our best this year to survive and when we reach the end of this journey, give us those assessments. I have faith that once the playing field is level for all our students being back in school, without masks, for a full school day and 5 days a week we can be sure the assessment will accurately reflect their skills and deficits. Giving educators useful and important data that can be used to promote and solidify the gaps in their education as a result of the pandemic. Thank you.</p>
104	1/26/2021	School staff	Yes	<p>I am writing to voice my support of the federal waiver requests for state assessment and accountability requirements for the 2020-2021 school year.</p> <p>As a school psychologist, I've observed that the COVID 19 emergency has drastically changed the learning experience for all teachers and students across the state both last school year and this year. In our district, our K-4 students have largely experienced a hybrid learning model for the current school year. Many of them have were in school only 2-3 days a week in person until mid-November. Fully remote learning occurred from mid-November to the end of the December with a return to 2-3 days a week of in person learning in January. Many other students have been 100% remote since the beginning of the school year.</p> <p>Although our teachers and our families have done their best to provide and engage in optimal remote learning experiences, it is inherently challenging. It is simply not possible to provide the same quality and duration of instruction remotely that can be provided in person. Technology often falters, time is lost to daily glitches, student engagement (particularly in the elementary years) can be very challenging during remote sessions. When our students returned to in person learning in January, I realized they had only had about a month's worth of in person instruction up to that point when they typically would have had almost four months.</p> <p>Student and staff illness and quarantine necessitated from possible exposures to COVID19 have further exacerbated the difficulties with consistent quality instruction and anxiety. Teachers simply cannot cover the same amount of content with their teaching time so greatly reduced. They've dedicated a much greater amount of time this year to making sure students feel safe, connected and comfortable in school in an effort to reduce anxieties about the current circumstances. This should remain a key focus.</p>

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				<p>The pressure of having to take and administer state assessments and being accountable to the standards of a typical school year is simply unfair, unwarranted and likely to be harmful under these circumstances. With instructional time cut so significantly, we simply cannot expect our teachers or our students to perform at the levels they would in a typical school year. These assessments would set everyone up for anxiety and failure. We have a wealth of data from local and norm referenced benchmark testing that tell us how our students are performing academically and what their needs are.</p> <p>I implore you to consider these waivers and spare our students and staff their instructional time and well being in these extremely challenging times.</p>
105	1/26/2021	Teacher	Yes	<p>I am a middle school math and science teacher at [REDACTED]. I am sending comments on the first waiver which reads as follows:</p> <p><i>The first waiver request seeks to waive state testing requirements at the elementary, middle, and high school levels. This waiver would also allow the Department to administer the New York State English as a Second Language Achievement Test (NYSELSAT) only to those English Language Learners who are able to attend school in person at least some days of the week.</i></p> <p>I am asking for the Federal and NYS Governments to please approve this first waiver. From my experience as a teacher and a parent of 2 middle school children, the state exams for grades 3-8 would be a waste of time and money. Most students in the state are not attending school full time. Teachers are struggling to make sure the material is being taught and will have no time to make sure the students enter into a state exam prepared to take it. Many schools started the year later, plus add less direct instruction, students will not have had all the material in time for the exam. Teachers have gone above and beyond this year working in all types of settings. It is more important for them to continue to teach content, then it is for them to figure out how to prepare the students for a state exam. The state exam would cause unneeded stress for students, teachers, and parents. I also believe many parents will simply not send their kids to school to take the 3-8 exams.</p> <p>As the parent of a daughter in advance algebra and living environment, and a teacher of both those topics, I can attest to the fact that most kids attending school only part time, will not be prepared for the regents exam. My daughter is an advanced student, and the teachers are struggling to get her all the appropriate material to because my daughter is only at school 2 days a week. I know right now that my daughter is not going to be prepared for a regents exam. This in turn will hurt her, when it comes to applying for college. She should not have this count against her. Under normal circumstances I know my daughter would have a better outcome on a</p>

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				<p>regents exam.</p> <p>This year has been a struggle for all. As a teacher, I have spent most of my free time adjusting to technology, with ZERO training. My daughter often cries because she knows she is not getting taught all the information that she would have been taught if she was in school everyday.</p> <p>I hope and pray that this is approved.</p>
106	1/26/2021	Not specified	Yes	Please cancel the tests this year. They will not be valid or helpful to students or staff. It's time to end this standardized testing altogether. NAPE is a fine test that samples students every few years to see how students are faring and it uses sampling. Let's teach kids like Finland does, one of the highest performing nations.
107	1/26/2021	School administrator	Yes	<p>Please approve the waiver for New York State this year for the English, Mathematics, and Science Assessments, Grades 6,7,8 respectively. It places an unfair disadvantage for students who do not have a home environment conducive to the days of school where they are learning remotely.</p> <p>Further, as it is technically designed to assess learning up to this point in a child's educational life, the sudden halt of in-person attendance in school last March, coupled with a hybrid schedule this school year negatively impacts them socially and emotionally, as well as academically. It more than likely will provide an unreliable result. Finally, what adult in the building will want to be touching paper examinations handed by other humans during this time of COVID?</p>
108	1/26/2021	Not specified	Yes	<p>Thank you for the opportunity to read the draft waiver and be offered the opportunity to comment. In view of the pandemic I look at everything in a cost/benefit analysis in terms of resources. The potential value of the data I would receive pales in comparison to the resources I would expend to create a safe testing environment, fair to all scholars and mindful of their access to technology, instruction and ability to attend school.</p> <p>My one goal is to have all scholars and employees alive at the conclusion of this school year.</p> <p>Thank you for the opportunity to provide input. I am pleased to say, I have met my goal so far. I do have one scholar in intensive care in [REDACTED] as a result of COVID and we are praying for a full return to good health.</p>
109	1/26/2021	Not specified	Yes	<p>I am personally in support of suspending all NYS academic testing K-12 for the 2020-21 school year. The disruption in schooling has been impactful, and modalities of instruction uneven and outside of the typical due to the COVID-19 pandemic.</p> <p>While the efforts of our public educators have been Herculean, our students' progress should only be measured locally to serve students' needs, and not tied to aid, resources, or ranking, as is typical of the NYS mandated academic testing associated with ESSA. I</p>

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110	1/26/2021	School staff	Yes	The ongoing and at times rapidly worsening COVID-19 pandemic has also caused enormous economic and emotional insecurity for our students and their families and made the task of safely educating our students immensely more challenging. All standardized tests should be cancelled this spring.
111	1/26/2021	Teacher	Yes	<p>I am writing to provide my viewpoint considering NYS testing this year in areas of State Exams in ELA/ Math/Science, Regents Examinations, and Language Checkpoint A&amp;B Examinations. I have been teaching German at [REDACTED] and believe I have a valid point of view for consideration.</p> <p>I do not believe these particular exams should be scheduled during the 2020-21 school year for several important reasons. Obviously, everything has changed in the realm of public school education since March 13, 2020, when Governor Cuomo closed the schools due to the growing risk of infection from Covid-19. The cancellation of these exams last year seemed to be an obvious choice as we were all just trying to survive at that point.</p> <p>While we have made progress toward returning to a new state of "normal" since then, I still believe that administering these exams is not the appropriate decision this year. The main concern that I have is in the ability to maintain fairness, equity, and legitimacy in having and scoring these exams. I teach at a very large district that has incredible resources available for both students and teachers and despite this, I see too many of our students struggling this year with so much more than just academics. I can only wonder about how students at severely disadvantaged school districts across the state are doing at this time and how they will possibly be prepared to challenge these exams. With this level of inequity spread across the state, What important data do we plan to collect? How will it be fair for some students to take exams from home while others are in the classroom setting. Although I try to have faith in people doing the right thing, it occurs to me that dishonesty and outright cheating may occur as exam security will be questionable.</p> <p>I acknowledge that these exams play an important part in the educational process. From providing student feedback on achievement, collecting data for comparison, to helping inform the educational process, in any other normal school year it would make total sense. Are we really going to administer exams simply because that is what we normally do? Nothing is normal this year and we should recognize that at the highest level of authority and policy making, temporarily shifting out focus away from the usual process to engaging in endeavors which provide support and structure to a return to campus for all as soon as possible.</p>



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112	1/26/2021	School staff	Yes	As a parent of students in elementary and middle school, and as a high school counselor, I strongly support canceling testing this year, as students and teachers have not had the opportunity to adequately prepare for such tests. Testing results this year would not be a true measure of student ability, and would rather reflect the pre-existing systemic inequities that have been exacerbated by the pandemic, thereby resulting in further inequities. Thank you very much for your time and consideration.
113	1/26/2021	Not specified	Yes	Due to the frequent disruptions and lack of consistency in learning as a result of the COVID-19 pandemic, I respectfully request the testing program to be cancelled for the 2020-21 academic year for all applicable grades. Many students have not been able to fully access or retain the curriculum this academic year, especially in the remote model, and it would be unjust and unreasonable to expect these students to perform well for these tests. Additionally, due to the learning inconsistencies across all grades, the test scores would not be an accurate picture of what students know and understand. Thank you for your consideration.
114	1/26/2021	Parent	Yes	<p>Please consider canceling this year's Regents tests. Let me give an example of the experience of my 8th grader taking 9th grade Earth Science. His teacher went on Leave of Absence right before school started, the district was not able to find a substitute so he has had a long term non-certified substitute who has not an experienced teacher. He is barely learning in that class.</p> <p>In other classes, like French, his teacher is absent on a regular basis.</p> <p>My 10th grader who is usually a motivated student is so bored because they spend so much time on screens. Their teachers are trying their best but with the challenge of teaching hybrid they are so far behind in where they should be on their topics for the respective subjects.</p> <p>It's not fair to penalize the children with Regents when the experience of their education is a total mess this year. I constantly worry and wonder how these students will ever get caught up on these subjects and skills that are necessary and foundational to high level classes.</p>
115	1/26/2021	Teacher	Yes	<p>I implore you to not subject our students to state assessments this spring! It is imperative that you listen to me and my colleagues when we say that they will not be prepared and furthermore, have already been through enough! The stress is mounting and I have seen first-hand what it is causing. The mental toll on my poor students this year so far has been monumental.</p> <p>Much of NYS is still in an all remote teaching model!! And those that are not are in a hybrid model which only allows students to be inside their school buildings 2 days per week. Even those that have been hybrid since September have faced multiple closings. My daughter is on her third all remote shutdown since September.</p>

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				<p>Every few weeks she has to transition from being partially remote/partially in school to being fully remote again. To be quite honest, it has been nothing short of a circus!</p> <p>I am glad that you think we teachers have been "effective" during all of this. I wish that we felt that way. It is true that we have been challenged beyond belief and have risen to that challenge. It is true we have learned more new tools and technologies in less than one year than we ever thought imaginable. It is true that we have found new and creative ways to connect with our students. But, all of these DO NOT equate to them being prepared to take state assessments!! Just the opposite. The teaching of the curriculum for these tests have been shallow and lacking in so many ways. For heaven's sake, I am a science teacher who cannot even do hands-on science labs with my students this year! I am also a teacher who DAILY has to plan 3 different lesson plans for ONE 40 minute class! One for the at home synchronous students, one for the in person synchronous students, and then a third for the asynchronous students who often are not able to connect to class that day due to: broken device, broken charger, no parental supervision, they or a family member is sick with COVID...the list could go on and on.</p> <p>I honestly am amazed that it is even still in consideration that these tests will be administered. It would be the greatest disservice to these students and their hard-working education professionals that this State has ever imposed. NO STATE ASSESSMENTS for the 2020-2021 school year!!</p>
116	1/26/2021	School board member	Yes	<p>I am a former school board member (9 years) and school board president (3 years) of the [REDACTED].</p> <p>I support the petition of the NYS DOE to cancel this year's testing program for elementary, middle and high school students due to the extreme stress and disruption they (like all of us) have suffered during this pandemic year.</p> <p>This is a year like no other and our students have had to adapt to constant changes in how their school proceeds or doesn't proceed. From in person learning to remote learning to hybrid set ups, the students have worked hard to do their best--as have their teachers in trying circumstances. To add the stress of standardized testing to the lives of our children, teachers and, frankly, parents as well would be unconscionable. I urge you to be flexible and adapt to this unfamiliar world we are all living in.</p>
117	1/26/2021	Parent	Yes	<p>I strongly support granting testing waivers this year because of the extraordinary level of academic disruption. The test results would be meaningless and the process would be harmful to students, families, and learning outcomes.</p>

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118	1/26/2021	School board member	Yes	I feel very strongly that due to the ongoing pandemic, the digital divide, along with many school districts not being able to provide even a hybrid model, so that students would have some in person instruction, the assessments cannot be given safely or fairly. Furthermore, in view of the last 10 months, if these assessments were given, they are not a real indicator of where our students should be.
119	1/26/2021	School staff	Yes	<p>I am writing in support of the NYSED proposal to waive the state assessments and forgo accountability requirements again for the 2020-21 school year. I am an ESOL teacher in a relatively prosperous suburban school district. Given the challenges of teaching this year, and the frequent interruptions to change from remote to hybrid to remote to hyflex, in only half a school year, have made it impossible for students to master the material that is assessed by the state assessments. The linguistically and culturally diverse students with whom I work are at an even greater disadvantage with less access to technology than their peers, and lack of direct contact with teachers.</p> <p>The best option under these trying and difficult circumstances is to forgo both the assessments and accountability requirements again in the 2020-21 school year.</p>
120	1/26/2021	Not specified	Yes	Due to the lack of strategic planning on the part of the federal government, state governments (such as NY) have been unable to provide clear answers or guidance on several key factors relating to school and student success. Additionally, the hybrid model practiced by many school districts this year has been complicated by issues revolving around equity, including access to high-speed Internet, support for at-home learning, etc. Finally, the majority of existing research conducted throughout the past year shows a sharp increase in mental health concerns among students, support staff, faculty, and admin, leading to the logical conclusion that any data collected for student or district assessment purposes would be statistically useless. The bottom line? Students, teachers, staff, and admin have not received the necessary support to effectively demonstrate consistent growth across key areas of development. State assessments would only heighten levels of stress, anxiety, and uncertainty, and would ultimately harm the students and educational professionals who have already sacrificed their physical and emotional health to an unreasonable extent throughout the pandemic. Teachers are working harder than ever to keep students on track, and students are doing their best under the circumstances to learn under unprecedented conditions. I urge you to take action to waive assessment and accountability measures for the 2020-2021 academic year.
121	1/26/2021	Parent	Yes	I support the petition by The New York State Department of Education to the United States Department of Education. Educational disruption significantly impaired my son this past year. Before the pandemic, he was a very strong student and loved school. The disruptions, remote learning, and lack of in-person interaction with his classmates and teachers, have had such a significant impact on him that we are concerned as to whether he will pass this year. The only thing that saved him at the end of the 2019-20 school year was that his grades were in the 90s for the first three quarters. My son is only one of many, many students who have been adversely

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				<p>impacted by the pandemic. Please do not put this additional burden on students by requiring more testing. Focus should be on providing school districts with the funds that they need to make schools safe enough so children can have the education that they deserve.</p>
122	1/26/2021	Other	Yes	<p>I am writing to express my support for both the Assessment Waiver and Accountability Waiver to USDE. The COVID-19 pandemic has certainly had an impact on public education, most of it negative. Although LEAs have tried their hardest to provide students with the education that they deserve, this year is certainly not comparable to years past. According to the Fall 2020 Digital Equity Survey, 18% of students from the [REDACTED] did not have access to a dedicated computing device, and nearly a quarter did not have Internet access. These students are clearly at a disadvantage to do well academically compared to others who had access to adequate Internet and computing resources.</p> <p>With that said, I would argue that NYSED should also see if there is an opportunity to revisit and change its ESSA Plan. The current targets for most of the metrics likely need to be reset as a result of learning loss that could have occurred from the COVID-19 pandemic. Furthermore, if so many high school students have received an exemption from the Regents, how will that impact any accountability designations going forward?</p> <p>In terms of the Assessment Waiver, my main qualm is about letting students test on the NYSESLAT if they are able to in person. NYSED gave all students and their families the right to learn remotely during this school year, and ELL students who chose to do so should not be unfairly punished for looking out for their health and welfare.</p>
123	1/26/2021	Parent	Yes	<p>Please cancel standardized testing for this year. With any luck we will be vaccinated and have this pandemic under control next year and can get a better sense of things then. As an FYI I will not be sending my children into any school building without mandatory covid testing until they are vaccinated. If you do run the tests it is imperative to make sure they can be administered remotely. There is no justification for forcing families to put their health at risk, particularly with new more contagious variants afoot and vaccinations around the corner.</p>
124	1/26/2021	Principal	Yes	<p>Thank you for drafting this communication. Testing will minimally take a week of instruction time away from our students who are already losing much needed instructional time. Furthermore, we have students who are attending remotely that will not be able to take the assessment due to their remote status and the inability to ensure testing security.</p> <p>Districts are all at different places with their models of in person and remote learning making this year's assessment much more inequitable than in the year's past. Additionally, holding school's accountable for participation this year would be inappropriate. There are way too many factors out of our control compounded by the testing opt out movement that began a few years ago and still exists.</p>

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125	1/26/2021	District personnel	Yes	<p>I would like to say that I fully support the waivers as requested.</p> <ol style="list-style-type: none"> <li>1. The emotional toll that the virus and style of schooling has made on families, students and teachers is incredible. As we do our best to engage every child, we are finding that more students and families are struggling as time goes on. The teachers, as they instruct remote and face to face mostly concurrently have to balance the rigors of the standards, emotional stress for themselves, their families and students are struggling as well.</li> <li>2. The assessments present a financial and personnel burden to districts that is only exacerbated by the virus, and budget cuts.</li> <li>3. Instruction in this model no where matches the high quality we have given in the face to face model and gaps from last spring are very real.</li> </ol>
126	1/26/2021	Not specified	Yes	<p>I think students are [REDACTED] especially in middle and high school have not learned a lot as there is lack of supervision for them and schools are closed. Students have more pressure and need no check or support from home because there parents are working.</p>
127	1/26/2021	Teacher	Yes	<p>I am in full support of a waiver for the Spring 2021 state assessments. In addition to the evidence given in the waiver applications, the student gaps in learning from the spring of 2020 continue to impact the classroom and the pace of learning. Make no mistake, there is learning happening and students are moving forward with their studies. The way in which that is happening is a slow, laborious process and there is no way that a state test could measure the varied achievements and deficits that students have in an equitable way that would give any meaningful data. To that end, the instructional time that is so precious to us this year would be wasted on these tests. Please accept this waiver.</p>
128	1/26/2021	Teacher	Yes	<p>Please grant our schools a waiver for state testing this year. This year has been part-time learning really. It is not a good time to stress out our teachers or students with state testing. What will state testing show you? That students are behind in their learning? I think we all know this already. Why are you going to spend thousands of tax-payer dollars on this?</p> <p>Everyone is really just focused on staying safe, and learning online and in-person twice a week. Everyone is doing their best in this terrible situation. Why would NY State try to test students who will not feel adequately prepared? It will only show the growing divide between students who have and have not. Thank you for considering.</p>
129	1/26/2021	Teacher	Yes	<p>I am emailing about the potential to waive state tests for grades 3-8 in the 2020-2021 school year. As an ELA teacher in middle school, I have seen first hand the deficits my students have. Successful and accurate gauging of</p>

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				students abilities cannot properly be understood in the midst of a pandemic. Since we are still struggling in this pandemic, with no end in sight, a waiver would make the most sense as it is already a stressful and trying year for our students. Not only can students not show their full potential, but they also cannot truly be assessed at a state level!
130	1/26/2021	Not specified	Yes	I fully support the application for waivers from ESSA testing requirements this year. As Board of Regents Chancellor Lester Young Jr. said, tests “cannot be safely, equitably and fairly administered” this year. “The ongoing and at times rapidly worsening COVID-19 pandemic has also caused enormous economic and emotional insecurity for our students and their families and made the task of safely educating our students immensely more challenging” “Instructional time should be “focused on supporting students in academics as well as social-emotional health” rather than administering exams.” Amen to all that.
131	1/26/2021	Teacher	Yes	I am writing to express my support for waiver 1 which would waive state testing requirements. This honestly should not even still be in consideration at this point. There are many school districts in NYS that are STILL all remote and have been since the beginning of the school year. My district has only just begun hybrid teaching since January 4, 2021. Even then, we only see SOME students 2 days per week in the classroom (many have remained all virtual). I have had to figure out a way to teach synchronous in-person, synchronous at home, and asynchronous students SIMULTANEOUSLY each day. While many of us are making great strides during this very challenging time, there is absolutely no equivalent to having these students face to face with us 5 days per week. The depth and level of curriculum has been nowhere near what it should be. I honestly cannot even believe state exams are still being considered at this point. There should be no question that it would not be in the best interest of these students to make them take these assessments. Thank you.
132	1/26/2021	Not specified	Yes	<p>I agree with the waiver requests as they have been presented on the NYSED website. Both students that I work with, and others that I am acquainted with outside of the school setting, have faced a staggering number of challenges during the pandemic.</p> <p>At this point, there is still no true end in sight; the addition of virus variants, limited vaccine access, looming unemployment benefits issues, food insecurity, and limited access to mental health care. Limited to no in-person schooling time, school and home technology issues, and poor Internet connectivity are all added on to the pile.</p> <p>Time, space, and safety concerns are also factors that I do not see as surmountable. I see no logical reason that state testing should be held during the 2020/2021 academic year. Students at all grade and ability levels should not be forced to bear yet another burden.</p>

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133	1/26/2021	Teacher	Yes	I feel that there are too many variations in educational settings and resources for students, which makes imposing state testing on the students unreasonable at this time. Even the quality of internet service can vary widely among my students throughout the school day, and this has affected the instructional process for students. Thank you for your consideration in reviewing my concerns.
134	1/26/2021	Teacher	Yes	As a parent and an educator I do not believe that New York State Testing should be given this year. The students have had a large portion of the curriculum across subjects cut due to hybrid learning. Additionally, all districts are not equitable. Some students have had the opportunity to participate in person while others have been remote learning for several months. Many of those students have wider gaps due to this major issue. How can instruction be properly measured? There is no efficacy. Students from urban settings and special education students have even more challenges that they have endured due to the pandemic. They even have bigger gaps! State testing is not the best thing at this time. If done, many students will be set up for failure.
135	1/26/2021	Other educator	Yes	<p>As an educator for more than 20 years, I have never seen a more trying and stressful time in education. If there is anything that can be done to help elevate some of the stress for teachers and students, such as deferring state tests this year, it should be done.</p> <p>Data from the tests this year, with hybrid instruction and missed time, will not be valid. It is important to remember we are working with children who are dealing with trauma on a daily basis, in addition to educators who are also dealing with stress and trauma. Any results on state tests would not reflect what students can actually do, and the data will not be helpful.</p> <p>Please put state testing resources to use helping our teachers, students, and families this year. They truly need the help.</p>
136	1/26/2021	Not specified	Yes	<p>I wish that SED could offer formative assessments for students to take either in person or remote this year. Maybe offer this periodically for the remaining months of the school year. I think it's important to understand that students are maintaining basic skills, these test would also give you the opportunity to identify who needs to go in now and/or when we are back in person. But, I would love these to use gaming terms! Don't even call it a test, ask kids to beat their best scores!</p> <p>Thank you for pursuing this waiver. I don't think that we would get a true reading of students abilities given that the instruction wasn't equal or consistent.</p>
137	1/26/2021	Not specified	Yes	Well done! I completely agree I'll opt out if did attempt to test the kids.
138	1/26/2021	Parent	Yes	My child is in no way ready for exams.

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139	1/26/2021	Teacher	Yes	Our students have been through enough this past year. Subjecting them to high stakes testing in a normal year is inappropriate in my opinion. Subjecting them to high stakes testing in a year where some are working from home, some are seeing their teacher virtually from another classroom and all are working off of a Chromebook is borderline criminal. They have been through enough! The focus should be on making this year as normal a year as possible and making sure the students are doing well mentally, psychologically and socially. There will be plenty of time for testing once the pandemic is over. Please do not subject students and teachers, and parents, to the unnecessary angst and nervousness surrounding state testing.
140	1/27/2021	Parent	Yes	<p>As parents of a Freshman at [REDACTED] we feel a strong necessity to convey our utter support to the Cancelling of this year's Testing Program for elementary, middle and high school students.</p> <p>It's redundant to mention the disruption of the level of education in 2020 and 2021 hence the unsuitable scenario to demand any test results from our students until educational preparation resumes it's balance.</p>
141	1/26/2021	Parent	Yes	Please cancel this year's testing for High School students as they had too many interruptions to be aptly prepared.
142	1/26/2021	Not specified	Yes	I am requesting that NYDS tests are waved this academic year due to the fact that the students have not been in school for the year. Virtual teaching isn't the same as in classroom teaching at all. While many students did thrive, a solid half did not. I see it in my Cohort classes. Many have no support and at home (or internet service) and have fallen behind. What is the purpose of this testing? I know they fell behind. I am using what time I have face to face to help them catch up. This testing serves no purpose. I am requesting this waiver because we have determined the spring 2021 State assessments cannot be safely, equitably and fairly administered to all students across the State given how severely the pandemic has impacted the delivery of instruction to students and adversely affected their social and emotional well-being.



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143	1/26/2021	School staff	Yes	<p>Thank you for opening the floor to public comment on the issue of testing students during the 2020-2021 schoolyear. I genuinely appreciate the opportunity to share my thoughts and concerns with you. Before I share my opinion, please know that I respect and value assessments. I believe in assessments as a learning tool and in my tenure as an educator, I have always expressed the importance of respecting and maintaining the integrity of all assessments.</p> <p>With that said, I feel it would be unjust to assess students using state-sanctioned standardized tests, and have those scores be attached to their teachers' annual professional performance review.</p> <p>How could a student who is fully remote have the same chance to do well as a student who is fully in-person? It would be irresponsible of us to assume that both children have a fair and equal chance of demonstrating success. We cannot administer an exam when the field is so unlevel and the opportunities so imbalanced. The children did not have a voice or a choice in their remote vs. in-person fate. We need to be their voice now. Their test scores will be a part of their academic record and will have a ripple effect on their future endeavors.</p> <p>Furthermore, with state exams connected to teachers' scores at the end of the year, there is too much at stake if we carry on "business as normal." There is nothing normal about what is going on in schools right now. We cannot base part of a teacher's evaluation on flawed exam scores, which is what the scores would be: flawed.</p> <p>We have to consider <i>cura personalis</i> – caring for the whole person - within every person.</p> <p>The academic world right now is one in which all constituents are fighting to survive. The pandemic has imparted an incredible amount of stress and strain to fulfill simple operations. Teachers and staff are warriors fighting on the front lines: learning new technology, implementing new pedagogy, trying to keep kids afloat, engaged, <i>happy</i>, but the truth of the matter is: there is a social-emotional piece that adds a layer analogous to another arduous mountain to climb.</p> <p>Master teachers are not only facilitating academic achievement, but they are also daily points of contact for children reporting the sad reality: the kids are tired. They are lonely. Their eyes and brains hurt. They are staring at screens all day. Sometimes a day or days could go by when the children don't use their voice. The effect on the children's mental health right now is a very sad and real consequence of remote learning or hybrid learning, and honestly even in-person learning when some of the day is also spent on electronic devices as teachers multi-task live-streaming to include the remote learners with their in-person cohorts. Furthermore, students are experiencing a major upheaval of their lives with extra-curricular and athletic connections and</p>

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				<p>physical exercise coming to a halt or severely diminished. There are too many factors involved that will skew the results of any state standardized test administered.</p> <p>I am respectfully requesting that you reflect once again on all these external factors affecting student performance. How can we use the state exams as any kind of indicator of what students actually know? We cannot. The chances of the state exams providing useful data that could be used to inform instruction is slim to none.</p> <p>Yes, students should be assessed, but those assessments should be created and administered at the local level, created by the department within each school, for it is only <i>the teachers</i> in each school district that understands their students' reality. It is the teachers who can design and create fair assessments.</p> <p>We cannot impose upon the children of the State of New York one assessment for all in their respective subject areas and/or grade levels. There are too many variables! We would be fooling ourselves if we thought these tests had any value the way standardized tests given during a regular school year would have.</p> <p>I am urging you to strongly consider waiving all standardized tests for the children of New York. They need love, compassion, and understanding, and they want to do well. They need <i>a fair and fighting chance to celebrate their knowledge</i> and show what they have learned. Their <i>classroom teachers</i> know how to assess them best. Their <i>classroom teachers</i> should be the ones to design the assessments that will give the children an opportunity to show all that they have mastered.</p> <p>As stated above, I support state exams – in a regular year. This year has been far from regular. We are all working tirelessly to keep our school districts <i>open</i>, to keep our families and ourselves <i>safe and healthy</i>. It would not be right to go forward with any state exams given the circumstances of a global pandemic. We have been called to action, and is our civic responsibility to do what is right and just.</p> <p>Please reconsider approving the waiver for student testing. Thank you for your time and consideration and for opening this to public comment.</p>
144	1/26/2021	Teacher	Yes	<p>I am writing to express my concern for my students. They have been through a most difficult year and the added stress associated with testing only exasperated the stress.</p> <p>My students have come to embrace the use of technology in their learning. If it is required to test my 3rd graders please allow flexibility with the format as they have not done a great deal of written work and prefer using their devices</p>

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145	1/26/2021	Teacher	Yes	<p>I speak only for myself, I can't speak for my District or school. I speak from professional experience as a Physics teacher of 20 years, and from personal experience as a parent, for 8 years.</p> <p>High School level Science exams have their flaws, but overall, they stand as at least sufficient, or even high-quality, assessments of student learning. However - despite the herculean efforts of parents, guardians, teachers, administrators, and of course, children, the challenges of the SARS-CoV-2 pandemic make State assessment not just unfair, but invalid. Too many extraneous, uncontrollable pressures have been put on schools in the 2020-21 school year so far. State assessments would be not only unkind and not fair - their validity would be suspect, making them useless. Local Districts and educators have shown themselves resilient and capable so far - please leave year-end assessment in their hands. Thanks to the Regents for their continued support of NYS education.</p>
146	1/26/2021	Parent	Yes	<p>please do not require state assessments this year for any students. to do so would be indefensible given the known disparities and inequalities students are experiencing in their schools across the state. i am a parent of a fifth grade student in a public school. they have been on and off since last March. i would like to see where he is performing in two years. we need to wait until school is back to normal and then give the students and teachers a year to try to catch the students up to where they should be. then require schools give those 3-8 tests. honestly, those tests are neither useful, helpful or relevant to anybody right now. students and teachers have had enough thrown at them. please do not require state assessments for this year or even next year. give the kids and teachers time to recover and recuperate for a full academic year once all schools in the state are back to their normal in person classes.</p> <p>thank you for considering the damaging impact these tests will have on our kids and their teachers. please keep these considerations in the forefront of your discussions when you determine why the 3-8 tests need to be waived for all schools in the state for this and the next academic year.</p>
147	1/26/2021	Not specified	No	<p>NYSED, I do not think it would be wise decision to cancel state assessment testing due to this Covid pandemic. There is much to be learned concerning how Covid-19 has both effected our education system as well as testing the success of remote learning across many grade levels. The data could assist in developing future learning plans and shift our system as a whole in the correct direction should a terrible event such as this pandemic force remote learning to become more frequent or permanent. I do however agree that this year's state assessment testing should not be a determining factor on a student's ability to progress a grade level. In other words, it shouldn't count. But we do need to know, knowledge is power!</p>
148	1/26/2021	Parent	No	<p>M ydaughter was in third grade last year, and state testing was understandably cancelled. That was the first year she was slated to take the test. Cancelling the New York Statewide test this year means that she will have had no meaningful experience with formal testing in her early Elementary school years, which I feel is an important academic experience for children to have. It's much easier on them in the long run if they can have a head start.</p> <p>State testing is already optional; parents can choose to opt out. Why can't the state test be administered, and</p>

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				<p>those who do not think their children can be judged fairly can simply opt not to take the test? If the concern is that learning disparities will cause the test to be unfairly used as a metric for funding/evaluating schools, why not deemphasize those metrics and keep the test, so as not to punish the kids who might benefit from taking the test?</p> <p>I would like my child to have a state testing experience and see what we can learn from how she fares when evaluated by standards that extend beyond her school and her district. I do not want this first experience to be in her last year of Elementary school, if not later. Please permit the New York State tests to continue. I hope, but do not expect, that New York State rescind this waiver request, and if they do not, that the Biden Administration deny this waiver request.</p>
149	1/26/2021	Parent	No	<p>I am writing to tell you that as a parent of public school children, I whole-heartedly oppose forgoing the assessments and Regents exams this year.</p> <p>Our children have lost nearly an entire year of regular instruction. If we do not measure their abilities now, then when?</p> <p>I am 100% certain that our children are behind, but even I am not certain as to how far for my own children. I say we give them these tests and then we will be well aware of what we need to do to bring them up to speed next year.</p> <p>Just waiving the tests, be they the earlier grades assessments or the Regents exams and pretending that this year's students have made the same benchmark progress as the students in 2019 is a fantasy at best and a certain detriment to the students academic performance in the future.</p> <p>My oldest is in the class of 2022 and is in the first cohort of students to take these standardized tests from early elementary school through high school. I have never opted my children out as I understand it is a snapshot of where they are in relation to the rest of the student population.</p> <p>If you waive the Regents tests this year and just pass the students along, will my now Junior in High School really be ready for college course work in 18 months?</p> <p>My youngest child was never the best student. He has struggled to complete his coursework since the 2nd grade. Needless to say his scores on the Statewide assessment were lousy. However, those scores told us all - parents, teachers, school counselors - that he needed help, and he got it. Throughout elementary school he had</p>

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				<p>additional emphasis in ELA and his progress improved. Had we opted out of those early assessments he would never have been placed in the extra help sessions because he wasn't classified.</p> <p>I know that the teacher's union is afraid of what the test scores will show because they think these tests are entirely a reflection of them. That's a ridiculous statement on their part. Everyone knows the students haven't been learning. Ask any parent, teacher or student - these past ten months have not been effective - regardless of the school district or region of the State. That doesn't translate to the teachers haven't been working no one is saying that this situation has been a picnic for them.</p> <p>We all know that what started as a 2-4 week 'flatten the curve' has turned into an abomination of remote, distance and hybrid structure that still doesn't seem to have an end in sight more than ten months later. Unfortunately, only the smallest number of students has been successful. Why shy from it now? We can't pretend the last year hasn't happened.</p> <p>If we don't measure our children now, we will only be chasing down ways to deal with their failures for years to come.</p> <p>Think of it this way - the check engine light is on in our car. Do we drive to [REDACTED] without seeing what the car needs?</p>
150	1/26/2021	District personnel	No	<p>As a Director of Bilingual programs, I feel it is essential that we get an accurate gauge of language for our ELLs. Though we have been administering progress monitoring tools, it does not replace the NYSESLAT. Thank you.</p>
151	1/26/2021	Not specified	No	<p>Is there a reason we don't want to know how our children have done with virtual learning? Who would this be helping if you did not administer these assessments? Certainly not the students. How dare you even suggest seeking a federal waiver to eliminate the annual assessments and Regents exams, AND the accountability requirements!</p> <p>Does the progress of the students in New York State, or the lack of progress, not matter to the Education Department in the State of New York? THIS IS LUDICROUS!</p> <p>It makes absolutely no sense not to administer these assessments. You will be failing all students in New York State if this proposal is approved.</p> <p>Parents and taxpayers have an absolute right to find out which schools have not done well so something can be</p>

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				<p>done to improve the quality of education in these schools as soon as possible! We cannot wait until the year 2022!</p> <p>We NEED to know how our children are doing at this point in their education, and how their particular school is, or is not, measuring up. And YOU need to know this too!</p> <p>It makes no sense for educators not to want input as to how their students AND their schools are faring, whether it be good or bad. We also need to ensure that the public also has knowledge of this, so we can have faith that something will be done sooner rather than later to improve these schools if any shortcomings have been identified.</p> <p>You cannot just toss away 2 years of assessments and abandon the children to whom this is affecting. We need to know how virtual learning has impacted our students so we can identify the areas where these students have fallen behind and give them the opportunity to improve.</p> <p>WHY PUT BLINDERS ON AT THE EXPENSE OF OUR STUDENTS!</p> <p>Shame on you if you decide not to hold these testing requirements. You are failing the children if you do so. We all know the children are not put under any “stress” when taking these tests. It’s the teachers and administrators who are stressed out by these tests, and the results thereof. And they shouldn’t be. Any good educator would welcome the opportunity to know how their students and their school is doing and what, if anything, can be done to help those students who are struggling.</p> <p>Do not abandon our children at such a critical time in their lives.</p> <p>You cannot use the pandemic as an excuse not to care about how the children in this State are doing educationally. Shame on you if you do.</p>
152	1/26/2021	Not specified	No	<p>I object to the State's request to cancel State tests this year. The pandemic has placed enormous challenges on a [REDACTED] school system where only half of children performed at grade level before the pandemic. It is essential to have objective measures of current levels of academic achievement.</p> <p>Canceling tests only serves the interest of school bureaucrats who want to escape accountability. When operating under a pandemic, why would you not want to know how far behind students have fallen? Why would you not want to know if there are pockets of excellence where learning continued despite the adverse circumstances? Why would you not want objective, system-wide information on current academic performance</p>

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				when planning recovery in the post-pandemic future? I support continued standardized testing, even if sanctions for poor school performance are lessened due to the pandemic.
153	1/26/2021	Teacher	No	<p>My name is [REDACTED] I am an elementary educator of English Language Learners. I would like to submit an opinion about the proposed federal waiver for state assessments for accountability requirements. I think it would be detrimental for our English language program to NOT hold the NYSESLAT exam this school year. This exam is what determines the level of service for ENL/EAL students and test them out of the program. Without this exam, our number of ENL students will remain the same and our district is already stretched to provide the LEGAL MINIMUM amount of service for these students. If we cannot give the exam, more students will remain in the program and this will prevent students from accessing their legal minimum amount of service because there will not be enough staff to cover all of the students. The only way to ensure that all students receive their legal amount of service is to hold the exam.</p>
154	1/26/2021	Not specified	No	<p>I think this difficult period has been made worse by what to me feels like an intransparent and politically driven process by the city and state. The tests will give an indication of how well the implemented strategies have worked, providing an important indication of what went right and wrong and most importantly where we will have to start from. Also, the test are important for applications to middle and high school which makes grades 4th and 8th testing particularly critical.</p> <p>Perhaps administering tests to 4th and 8th grades only to enable admissions as well as a way to get an indication of performance (e.g., 4th grade at any given school is probably performing very similar to 3rd grade at the same school).</p> <p>The test has to be offered to everyone, not only the children currently in in-school learning. This may well be possible later in the spring or worst case the test could be done immediately when the new school year starts after the summer. All in all, I find it unacceptable to not get the legally mandated data on performance now when it really matter and performance has been especially low and uneven which presumably is the reason this law exists in the first place. Also, I find it unacceptable to not provide for an admission season.</p>
155	1/26/2021	Parent	No	<p>I am a parent of a third and sixth grader in public school in [REDACTED] I am very concerned about the push to avoid testing for accountability and progress. Now more than ever, New York State needs to examine the impact of remote learning on students' education.</p> <p>The State has decided to keep schools open remotely or in hybrid, rather than close them down entirely (and essentially pause the school year), based on the assumption that learning can still happen outside of school. This</p>

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				<p>fundamental premise underlies the State’s entire approach to school guidelines, opening and closing. But what if students are not actually learning remotely? Don’t we need to know what is working and what isn’t?</p> <p>If the concern with testing is that students and teachers should not be penalized for poor performance during the pandemic, then that should be the understanding this year - no penalties for poor performance. But what possible, good-faith justification is there for avoiding this assessment?</p> <p>Everyone who participates in this system - students, teachers, all taxpayers - deserve the accountability that testing provides. Now is not the time to bury our heads or avoid assessing the impact that remote learning is having on our children’s education.</p> <p>I am disappointed and concerned that New York is seeking this exemption.</p>
156	1/26/2021	Not specified	No	<p>I am writing regarding the NYBOE request to cancel testing requirements for elementary, middle and high school. I feel strongly that the schools be required to conduct the tests as that data is crucial to understand the quality of the education provided to our students during this pandemic. Without this data I fear the BOEs will think hybrid and remote learning has been a success (it absolutely has not) and not push for in-person school that is desperately needed. I can understand how this could impact older college-bound students, but surely college application reviewers will understand sub-par scores during pandemic times. Please do not let schools get a "free pass" - we desperately need quality education</p>
157	1/26/2021	Not specified	No	<p>Thank you for the opportunity to comment. I think testing is more important this year than ever. Data on how well and/or abysmally school districts performed in their various remote only, hybrid and in-person pandemic models might inform best practices for future pandemics. Testing is an opportunity to give some clarity to months of concern, debate and confusion over how the disruption of education has and will continue to impact students. Testing should have a remote option for the students unable to risk exposure to the virus.</p>
158	1/26/2021	Parent	No	<p>It is incredibly important that every school in every district in New York State hold state assessments and accountability requirements for the 2020-2021 school year. Without state assessments:</p> <ul style="list-style-type: none"> <li>• How will our parents be able to measure their child(ren)’s academic achievement?</li> <li>• How will parent’s and other stakeholders evaluate the success of their district’s pandemic learning plan?</li> <li>• How will we evaluate if a Hybrid/Hyflex/Remote/half-day in-person/full-day in-person plan (or whatever plan each district has implemented for pandemic learning) is providing an equitable education throughout our state?</li> <li>• How will we identify and support districts/schools/students who have fallen behind during the school closures/distant learning/pandemic learning?</li> </ul>



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				<ul style="list-style-type: none"> <li>How will a district determine if their entire student body has fallen behind and steps need to be taken to alleviate the lag?</li> <li>With less information collected, how will the district and its stakeholders assess areas needing improvement and support all who require this support?</li> </ul> <p>As you know, The Every Student Succeeds Act requires districts to reports on academic performance on the state, local, and school level. This requirement exists so that parents can access the information needed to engage and advocate for the education of children in their community, and for our districts and schools to set specific, targeted plans. At a time when grading and evaluation of students is 'less than traditional' due to distance learning and online assignments, parents need a solid method for analyzing their child(ren)'s academic gain and the success of their school's/district's pandemic learning plan. Please retain the academic assessment of our children this school year.</p>
159	1/27/2021	Not specified	Yes	It is imperative for the children's wellness in this State in NY that we cancel this year's testing program for elementary, middle, and high school students due to the level of educational disruption experienced This school year. Their need to heal from such challenging times during their social/emotional development and rapid changes in the society in which they were born.
160	1/27/2021	School staff	Yes	<p>Please, please, please cancel state testing for the 2020-2021 academic year. Students, teachers, support staff, and families have been living in a make-or-break world of the pandemic. Students' lives, homes, health, education, and well-being have been in an upheaval for the last 10 months.</p> <p>There is no possible way to conduct fair, balanced, educationally sound, or solid testing with students in hybrid situations, in homes with poor wifi, or with any hopes of validity considering how many times school may have changed, stopped, and then restarted this year. There is no way to norm results with students in such varied situations across the state. NONE.</p> <p>Save the money. Put off the test. End the stress and reliance on arbitrary and inadequate markers of achievement. If this year politically and socially has taught us anything as Americans, the lesson should be to take care of each other. Take care of the teachers, students, and families right now and end this wasteful, invalid stress.</p>
161	1/27/2021	School staff	Yes	As we continue to navigate our way through the roiling waters of the covid-19 "storm," we come to the realization that the enormous impact of this storm includes food insecurity, housing insecurity, rising domestic violence, isolation and a mental health crisis amongst many other ripple effects. These effects are just the tip of the iceberg. Most families in my school district [REDACTED] have opted to walk the safer path of remote learning. While they realize that working remotely is not a substitute for in-person learning, the fear of contracting this insidious virus makes sending their child to school a non-starter. It has therefore become

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				<p>apparent, that there is a vast chasm of access and ability for many in poorer communities to become accomplished remote learners. It may take all of next year to simply get our students back to where they should be and find some semblance of normalcy.</p> <p>I believe that going ahead with state assessments for the 2020-2021 school year would be a disservice of the worst kind for students caught in a freefall not of their making. Our time should be spent insuring that these children receive the social-emotional support that they need, while simultaneously helping them navigate these treacherous waters. The emphasis needs to be on a wholistic approach to education, while differentiating instruction based on numerous factors that include accessibility and need. Help us to help these children recover what they've lost while building trust, confidence and resilience.</p>
162	1/27/2021	Not specified	Yes	<p>I am writing to express my support for the proposed waivers for state exams for students in grades 3-12. I am a parent of an elementary aged student in [REDACTED] Requiring these kids, who have been an inconsistent and unequal amount of instruction, to take these tests is pointless. Because of all the variables this year has brought, the scores cannot be compared to any from the past, even on the individual level. Schools and teachers would be judged poorly for an inevitable drop in scores that are due to circumstances outside of their control. If the scores will not be useful, why take them?</p>
163	1/27/2021	Not specified	Yes	<p>As a teacher, I feel that the students and school districts have lost so much time to teach academics. Virtual learning in the spring was not successful for more reasons than I can write. The students have been shuffled from fully virtual to 2 days on 3 days off to 4 days a week and one virtual day..... the consistency of instruction has been very difficult. Plus, multiple kids have been on quarantine at different times. Testing kids on skills that have been in consistently taught, and not all students have had equal access to the information. Also, no one needs the added stress of a 2 day test for ELA and Math. Please consider canceling the tests.</p>
164	1/27/2021	School staff	Yes	<p>I am writing to you to express reasons that we would like the 3-8 testing waived this school year:</p> <ul style="list-style-type: none"> <li>• With completely virtual students not being able to test, we are not providing equity for all students in regards to test availability.</li> <li>• With my district having A-L students attend two days a week and M-Z students attending two different days during the week, testing our students would take 4 days. This would increase our loss of instructional time and test integrity would be compromised.</li> <li>• Students who refuse would lose 4 days of instructional time.</li> <li>• Housing students who refuse in a COVID time would be problematic and result in increased seating charts for contact tracing purposes. Thank you for reading through my comments.</li> </ul>
165	1/27/2021	School staff	Yes	<p>I'm writing to urge you to waive the federal requirement to administer standardized tests this year. This year has been unbelievably tough on our kids, and they've responded with incredible resilience and grit. Testing simply shouldn't be the sole focus of our education system this year. This will unfairly penalize students during a time of</p>

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				unprecedented challenges to learning. State assessments cannot be safely administered and will not provide teachers or districts with valid measures of student progress and achievement during this pandemic.
166	1/27/2021	School staff	Yes	<p>I am writing to express my professional opinion about the upcoming assessments for this school year. I think it would be extremely unfair to expect students to take the standardized tests and Regents this year. As a 3<sup>rd</sup> grade teacher, I can tell you personally that my students would not be prepared no matter how much I have tried to cover with them. Students missed months of school last year and most schools were not live teaching at that time, therefore new material was not covered. This made school this year more challenging because we are still playing catch-up. There is also not an even playing field whereas some districts are back fully, some are hybrid and some are remote. Remote/hybrid have been a disaster in lower income districts (where I happen to teach). Technology is a problem, attendance has been horrific and students are not held accountable for completing work because many of these students are at daycare, a babysitter, with someone who does not speak English and is unable to help them navigate through their work. I am doing by best with them and they are learning, but we are pacing way behind and I am finding that they are missing skills from last year that I have to stop and reteach them. And when students are absent or miss live meetings, they miss new topics and are lost. As a mother of two where my older child did not have to deal with a pandemic in high school, she was much more prepared for the Regents. My second is in the same situation as me, playing catch up from the material he should have learned last year which, in high school, is a pre-requisite for this year, so they are either behind or rushing through with many students not understanding the material. I don't even see how the SAT's would be fair. We have really set education back by fully closing last year and then not fully opening this year. Testing them this year will cause them much stress, they will not understand some of the questions and it will discourage the good students and hurt their transcript scores for graduating and applying to colleges. It's just unreasonable and unfair. Thank you for listening!</p>
167	1/27/2021	School staff	Yes	<p>I am writing to ask that you do not let middle schools go forward with state testing this year. Middle school students are finding it difficult to complete the minimized course load already, their connection to the building and staff is weak and there are increasing issues with mental health and stability. Testing on top of the issues that we already have would put students and staff through more stress than we are already dealing with. I strongly believe that the data gained from testing this year will not be about their actual ability but a reflection of the current situation.</p>
168	1/27/2021	Not specified	Yes	<p>Respectfully, I'd like to strongly recommend that students are not made to take State tests this year, and that, connected to this, that APPR is not tied to such results, or any other measures of student performance. Despite a great deal of truly excellent, innovative, and thoughtful planning and implementation of changes in approach during this school year, what we are performing is educational triage at best. Just as this is no-one's fault, so should no-one (this includes both students and their teachers) be unfairly and inappropriately judged because of an attempt to measure the results. There are so, so many factors that are leading to an inequity in outcomes for</p>

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				our students. These include a myriad of socio-economic factors, the emotional and physical wellbeing of our students, and the variety of approaches from different districts that have been irregular in their success. I am proud of the work and the outcomes of my own district, but others have not been so successful. Tying the assessment of students and stuff to standardized tests in these incredibly non-standardized times is not merely inappropriate, but just plain wrong.
169	1/27/2021	Other educator	Yes	As a curriculum specialist and AIS provider for my elementary school, I fully support the Board's views in that the state assessments cannot be safely, equitably and fairly administered. In a high needs district, such as [REDACTED], we are still struggling to get devices and internet access to every student. All students are not participating on a daily basis, and so I also support the second waiver request to eliminate accountability for identifying schools for improvement. This pandemic has brought many challenges to educators. Most importantly the need for more time with our students to make up for lost instruction. Giving assessments (when we can probably predict the outcome) takes away valuable time with our students. Please consider the waivers and let's prioritize what is most important for our students!
170	1/27/2021	Parent	Yes	<p>Thank you for all you do for students. As a parent of two HS students, I agree with cancelling all testing for grades 3 to 12. Students should not be placed under more pressure considering the losses experienced during the pandemic. Many families are struggling financially as well. Children have had so many burdens, schools can assess progress in other ways. What benefit do we get from testing at this time other than additional stress on children and families. Educators know what is best for children.</p> <p>There are no safe ways to administer the tests as well. Money can be spent to help schools in other ways than on standardized tests.</p> <p>Remote learning is not the same for all, some students do not have quiet spaces to learn or parents that are able to support them. Done students do not have proper WiFi connection, this is not fair so assessing in other ways must be done. My son has an IEP and the thought of the Regents is very groggy to him and he is worried about graduation.</p>
171	1/27/2021	District personnel	Yes	I'm in complete agreement to eliminate the requirement to hold 3-8 testing and the Regents Examinations for the 2021 academic year.
172	1/27/2021	Not specified	Yes	We are strongly in favor of both waivers and have been anxiously awaiting this news
173	1/27/2021	District personnel	Yes	I write to voice my concerns regarding state assessments for the 2020-2021 school year. My comments govern the assessments projected for possible administration in calendar year 2021 at both grades three through eight as well as Regents Examinations for the balance of the calendar year (i.e., June and August 2021 administration).

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				<p>I have been a certified educator in New York State since 1994. Since then, I have been a high school teacher of mathematics, an assistant principal at the middle level, and a curriculum director for Kindergarten through Grade 12. In addition, I have contributed by serving as an item writer for the Grade 6 Mathematics Assessment. I can say without hesitation that, in my entire career, this year has been like no other year in education, as I am sure you have read repeatedly. Given the unique nature of the school year, I feel as though it would be irresponsible, and even cruel, to subject students to state-level assessments this school year, including in August 2021. I speak most directly to the administration of assessments in mathematics. The topsy-turvy nature of this school year simply has involved too much improvisation for a typical state-level assessment to be administered. Teachers have, through incredible efforts, been able to maintain a strong fidelity to the delivery of instruction in mathematics. Nonetheless, pacing in the content-driven subject of math has suffered at varying levels, in varying ways, this school year. In the vernacular, we haven't been able to cover as much material. In the absence of specific guidance (i.e., grade-level/course standard prioritization) from New York State promulgated prior to September 2020, districts like ours were left to make local decisions regarding curricular priorities. In that environment, to hold students accountable for content knowledge by means of a state assessment of any kind is simply not right.</p> <p>For these reasons, I urge you to consider canceling all state assessments which have been scheduled for the 2021 calendar year.</p>
174	1/27/2021	School staff	Yes	I am the parent of two students, grades 4 and 6. One is full in person learning and one is hybrid learning, in the same district. I am a teacher in a neighboring district where students have been hybrid learning since September and secondary schools have been more fully remote than in person learning. There is no equity between districts and cannot possibly be evaluated equally.
175	1/27/2021	School staff	Yes	In light of the ongoing pandemic, I believe that both proposed waivers to forego testing should be approved.
176	1/27/2021	School staff	Yes	I concur with the waivers.
177	1/27/2021	District personnel	Yes	I would like to express my support in favor of waiving the 3- 8 assessments for the 20/21 school year as well as the accountability measures for APPR. With hybrid teaching, full remote teaching, quarantined classes, etc. student testing would not yield accurate performance and growth. They should be measured by the stamina and flexibility they have demonstrated throughout this ordeal. It is my hope that both waivers are passed as a sign of understanding and consideration of the difficult situation schools, students, teachers, and parents are faced with.

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178	1/27/2021	Other educator	Yes	<p>I worked in the [REDACTED] with students 5-21 years old. I am a physical therapist. While working with my students, I have noticed that their attention span has significantly decreased. More repetition and practice are required for retention of information. They are struggling with the emotional and mental health and are demonstrating increased behaviors as a result of virtual learning.</p> <p>For my own children that attend the [REDACTED], it has been extremely challenging to ensure they are completing all their assignments online. Also, a lot of times, they are copying and pasting information from a source and not working to rephrase information. Therefore, they are not learning the information, but just how to copy information from one place and move it to another. In my opinion, state testing is ridiculous. They are not learning the information necessary and are lacking an extreme amount of foundational knowledge. Basically, they have been out of school for a year. There is no comparison between virtual and in person learning. These kids are at such a disadvantage. Testing will not assist and will just add stress and anxiety. Their mental health is already fragile and will just cause it to get worse. No testing!!!</p>
179	1/27/2021	School staff	Yes	<p>My name is [REDACTED] and I am a 5th grade transitional bilingual teacher in the [REDACTED]. I am writing to express my agreement with the waivers that NYSED is applying for.</p> <p>During this school year, I have seen an incredible variation in the levels of online participation of my students. My district has undergone a variety of different instructional models during this school year, and for a majority of the year so far, students were only in-person for two days a week. On remote days, some students had limited or no access to online instruction, and I have spent, in some cases, weeks and months trying to get students connected, with varying degrees of success. Some students are sharing devices with siblings, others have limited internet connectivity, others struggle to navigate different learning platforms. Parents have expressed their confusion with online learning, and have shared that their children have struggled with learning concepts remotely.</p> <p>As a teacher of a class that is composed primarily of ELLs, the inequity of instruction, especially virtual instruction, has proved to be a challenge to my students. As such, I agree with the NYSED waiver that would alter the administration of the NYSESLAT (although I believe that there should be an alternate assessment for this academic year, as many of my students, in January, are only on their 30th day of in-person instruction), and also the waiver that would affect how districts are evaluated based on exams. Additionally, I believe that NYSED should look into waiving the NYS exams this year as well. Our students are undergoing a great deal of transition, stress, and challenges, and I believe that local assessments can better reflect the progress of our students.</p>

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180	1/27/2021	School staff	Yes	I am writing today concerning the waiver of State testing requirements for the Spring and June administration of the grades 3-8 standardized tests as well as the New York State Regents exams. I am in full support of such waivers. Moving forward with the scheduled timeline will add more stress to an already stressful time for students and teachers. It would also be unfair to students who have not received adequate learning time due to the current pandemic crisis. I believe that waiving the requirements would be in the best interest of our students.
181	1/27/2021	Other	Yes	During these unprecedented times, our students and teachers have worked diligently to create a learning environment for success. However, there are too many variables (internet issues, home environment issues, family issues, social emotional issues and many more) to administer a state assessment that would be equitable to ALL students. I feel we should waive these tests until all students have a level playing field.
182	1/27/2021	School staff	Yes	Our school is teaching in a half-day hybrid model. We see a morning cohort for 2 1/2 hours and then an afternoon cohort for 2 1/2 hours each day. It would be impossible to administer the tests to each cohort and provide ample time for all students to complete the exam each day, especially for those with testing accommodations. Students already function within an anxiety-inducing environment---masks, barriers, social distancing, etc. Adding a standardized test to the mix would be a detriment for many of my students. Also, our teaching time already is limited for direct instruction. I do not want to devote 2 days for ELA and 2 days for math to administer an assessment that will NOT guide instruction for us this year. Also, test correction would also take us out of our classrooms. It would also be extremely difficult to maintain COVID19 safety measures, with multiple people managing multiple stacks of paper.
183	1/27/2021	Parent	Yes	I strongly believe that in a year such as this, a year plagued by a pandemic that has only further deepened and brought to the forefront the inequities that already exist within our education system, that state assessments should not be administered in spring 2021. State assessments have such a narrow lens on learning and are inherently biased (as data has shown) and cannot possibly accurately reflect a student's true ability or potential. In regards to this year, however, in the context of logistics, I think everyone can agree that it will not be possible for the state assessments to be administered fairly, given the wide range of circumstances of all students (unreliable internet access, unstable living situations, not having equitable preparation for the assessment, etc.). I sincerely hope that the state assessments will not be administered this spring and that the weight that they carry, in terms of judging a student's abilities, going forward will be carefully reassessed and reconsidered, given all the existing inequities that have been highlighted in the course of this pandemic and so that we can make a true effort to begin to address these inequities within our education system. I also strongly believe ESSA accountability requirements should be waived this year, given how much schools have had to navigate and been overburdened with because of the pandemic on top of all the myriad issues and considerations that schools already manage and navigate on a daily basis. It is simply the right choice.

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184	1/27/2021	School staff	Yes	As both a teacher and a parent, I have witnessed the dramatic differences between school districts and their ability to reach their students and provide instruction during the global pandemic. I can only imagine if we extrapolate that sample across New York State and the country, the differences would be even more stark. In the district in which I teach, there is a hybrid model as well as many students who are fully remote. It has been extremely challenging to provide the same quality of instruction to all students compared to a year where all students are in the building. I teach two sections of Global Studies 2 (Regents) inclusion classes. Many of the students with IEP's are fully remote and it has been very difficult to make sure they are learning at the same rate as other students. I am very confident that if State assessments were administered this spring, it would be nowhere close to a real reflection of student ability. As a parent of a child in fourth grade, despite the best efforts of her teachers, it is very apparent that the instruction in the classroom is not what it would be if students were in school five days a week. I believe that the greater focus this year should be on student mental and physical health during this unprecedented global pandemic. Additionally, state assessments have already been cancelled last spring and January. The status of the schools and the pandemic has not changed. It would be unfair and unreasonable to expect teachers, students, and parents to prepare students for assessments based on a traditional school year.
185	1/27/2021	Parent	Yes	As a parent of three children (ages 16, 14 and 11), I urge you to suspend state testing for the 2020-2021 school year. The instruction this year has been greatly impacted and interrupted by the global pandemic. Giving these children a standardized test will not serve as an accurate measurement of their knowledge and will only make the children feel more stress.
186	1/27/2021	Not specified	Yes	<p>In that the children of New York State have been adversely affected psychologically due to a <u>lack of social interaction</u> with others - a vital component in the healthy development of children, coupled with the uncertainty, <u>incessant changes in school scheduling</u> etc. our children are now <u>confused, and afraid</u>. Many children are unduly stressed due to <u>inadequate technology and/or reception</u>. Many are realizing that or feeling as though they are being <u>left behind or lost</u> and obviously <u>unprepared</u> for State as well as school tests!</p> <p>The negative impact of all of these factors will inevitably lead to <u>increased test-anxiety</u>. Do we really need a test to tell us what we already know? - that our children are not academically on par this year. How <u>valid</u> would such test results be anyway as an indicator of a child's true ability level?</p> <p>These tests are intended to measure the yearly academic <u>progress</u> of our children. We all know that is not within the realm of feasibility at this time. We would be doing our children a grave disservice by moving forward with such an unwise, unnecessary and unjust act as this!</p> <p>Please let us be on the <u>right side of history</u> during these most extraordinary times and do right by our most vulnerable ones - our children.</p>



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187	1/27/2021	School staff	Yes	<p>My name is [REDACTED]. I am a [REDACTED], a veteran teacher of 25 years currently working at [REDACTED], a teacher with experience at two different districts (small city and first ring suburb), at 3 different schools (one middle, two high schools) and at all grade levels 7-12. I have taught every level over my 25 years - from standard grade 7 math to IB Analysis and Approaches, AIS remediation to Honors Geometry to a 2-year Regents Algebra course. I am also a parent of a 19-year-old college freshman who graduated high school last year as the class of 2020 and a 16-year-old high school sophomore who is now experiencing year 2 of virtual learning. My educational experience is vast in many different roles. Due to my expertise, I can say emphatically that any standardized testing is NOT appropriate for New York State to administer during the 2020-21 school year.</p> <p>Let's put it simple - nothing is equitable this year. Students can be completely virtual, hybrid, going 2-5 days a week in person. What device are they using? Is the internet connection acceptable (do the students even have connection)? What feedback are they getting from teachers? Are their parents working or at home while virtual learning is occurring? Are they receiving all services on their 504 or IEP due to the virtual limitations? Is all of the curriculum covered? How much time is spent on instruction this year vs a "regular" school year?</p> <p>For myself as a teacher and for my daughter as a student, the answer to time of instruction in both districts is LESS. Quick calculation - my district has 42 minutes per class period at the high school level for our in-person class periods. That is 7,560 minutes of instruction over 180 school days. In the virtual and hybrid classroom this year, we have 35 minutes per class period. That reduces to 6,300 minutes of instruction per 180 school days. This year, my students will receive 1,260 less minutes of instruction compared to a regular school year. Divide that by our normal 42 class minute periods. OH MY. They are missing out on an additional 30 class periods of instruction.</p> <p>THAT IS 6 WEEKS OF INSTRUCTION LESS THIS YEAR THAN 2018-19 STUDENTS (we obviously cannot compare to last school year). No wonder I feel like it is difficult to stay on pace with the Geometry curriculum compared to the last 12 years that I have been teaching that course. State Ed has not provided teachers with any adjusted curriculum due to pandemic changes. How does NYS even know what order of curriculum is given for any subject or grade level to create a standardized test to be administered this school year? It cannot be based on current curricular maps.</p> <p>The state should not be focusing on administering standardized tests this year. Instead, the focus should be on how we will be able to close the gaps created by pandemic learning from the past two years. There will be holes to fill for every student at every level in every subject. How do we move forward to ensure that their learning comes full circle by graduation? State Ed needs to concentrate on instruction and curriculum, not on standardized assessments.</p>

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188	1/27/2021	School staff	Yes	<p>I am a high school US History teacher at the [REDACTED]. I teach 1 section of AP US History and 3 sections of Regents US History - 2 of which are ICT sections. It is impossible to overstate the negative effect of the COVID-19 pandemic and poor planning by the [REDACTED] on student mental health and learning. I do not believe high school Regents exams can be administered this year.</p> <p>The COVID-19 pandemic only widened existing educational inequalities. Here in [REDACTED] the start to the school year was delayed twice, leading to a loss of instructional time. The delays to the start of school have created chaos and stress for students, families, and teachers, compounded by the city's recent switch to all-remote instruction for high school students. While some schools began regular instruction <a href="#">as early as August</a>, our students did not begin receiving any instruction until the end of September. Furthermore, Black and Latinx students <a href="#">are more likely</a> to begin the school year remotely than their white peers. While remote instruction offers many possibilities, it does not replicate the support of in person school. In [REDACTED], the requirements of blended learning and the staff shortage have dramatically limited instructional time for students. At our school, our classes meet for two fifty-minute periods every six school days. This is simply not enough time to teach the content and skills required for high school Regents exams.</p> <p>In addition to the lack of instructional time, our students, <a href="#">along with Black and Latinx people nationwide</a>, are still disproportionately affected by COVID-19. Many students have lost family members and been ill themselves. Many students still do not have access to reliable internet, or share devices with others in their home. Many students have responsibilities such as monitoring younger siblings' learning, or working to support their families. The pandemic is far from over, and the social and emotional needs of our students must be prioritized. Our students want to be successful, but requiring them to demonstrate success on the traditional Regents exams this school year is inequitable and irresponsible. By administering the traditional Regents exams, the State would perpetuate racial and economic inequities by making the tests and high school graduation only accessible to some, predominately white and wealthy, students.</p>
189	1/27/2021	School staff	Yes	<p>I am writing today concerning the waiver of State testing requirements for the Spring and June administration of the grades 3-8 standardized tests as well as the New York State Regents exams. I am in full support of such waivers. In my time as an educator, and as a former student in NYS, I have seen how stressful these tests are on our students in a normal year. Trying to use these assessments on the students this year is unfair to both the school/teacher and the students. These students have not had a normal school day since March - they are stressed, overwhelmed, and emotionally exhausted. These tests will only make it worse.</p> <p>On a practical level, these tests will be hard to administer since students are in and out of school with quarantines and virtual learning. Many students do not have reliable internet connection at home so assessing at</p>

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				<p>home may not be an option. The accuracy of these tests may not be guaranteed for students that are not able to take it in a controlled school environment.</p> <p>Given the inaccuracy and the difficulty to administer the tests, and the emotional toll it will take on students and educators I strongly believe that all state testing for the 2020-2021 academic year be waived. This school year has been difficult and stressful enough as it is. Why should we make it worse just for a test?</p>
190	1/27/2021	School staff	Yes	<p>This year has obviously been stressful and abnormal for all members of school communities, and outright traumatic for many of our children. Even in the areas that are not the hardest hit, and where students have perhaps had some degree of in-person instruction all year, this year has been far from normal. Illnesses among students, staff members, and family members; necessary quarantines; switches to remote instruction; etc. have all created a year during which students cannot possibly complete all of their "normal" coursework. Furthermore, there has been no possibility that all the students of NYS could have learned equitably this year, given the widely varied situations and access to resources in different areas of the state. State assessments this year, at any level, would create incredible undue stress and hurdles in administration and will essentially punish children who have not had equal access to educational resources this year. These assessments should not be required.</p>
191	1/27/2021	School staff	Yes	<p>I am writing respectfully responding to the call for input regarding the 3-8 State Assessments and the June NYS Regents Examinations. It is my professional opinion that the 3-8 State Assessments not be administered this spring and the same procedures that were in place for the January 2021 Regents Exams continue for the June 2021 examinations.</p> <p>During a time where we have asked teachers, students, and parents to go above and beyond, the elimination of this layer of stress will benefit students and teachers in so many ways. Students will be able to enjoy learning while the teachers are able to continue instructing their students without the stress of the exams hanging over them. The loss of content delivery and in-person instruction coupled with the social-emotional stress placed on students over the past year should force us to reflect on what is important.</p> <p>We need to focus on the mental health of our students and provide them with the best education they can possibly receive. During these times is it best to pause to prepare and administer these exams? What about the students that are quarantined at home, how are they going to be able to come to school to sit for a secure exam? What about equity? How can you hold students throughout the state to the same standard when some schools have offered in-person instruction five days a week, others are hybrid, and many only being in the building for a few weeks while struggling to provide remote instruction.</p>
192	1/27/2021	School staff	Yes	<p>I am requesting a waiver of state tests this spring. The spring 2021 State assessments cannot be safely, equitably and fairly administered to all students across the State given how severely the pandemic has impacted the delivery of instruction to students and adversely affected their social and emotional well-being.</p>

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193	1/27/2021	School staff	Yes	Although, accountability and assessment have always been challenging for students with disabilities, throughout my years of teaching, my students have been successful on Regents exams. During these challenging times I have continued to provide rigor and high expectations for students. I can control my efforts and dedication to student success, but I cannot control student engagement during remote learning. I have made it a requirement for students to have their cameras on, but most refuse to a point where trying to enforce this expectation takes away valuable instructional time from other students. Parents are generally supportive, but many are working or unavailable to enforce camera use from home. We would hope that students value their education, but the reality is many students do not have the developmental capacity to understand the value a high school diploma has on their future success. My concern is if we require students to pass Regents exams to graduate, during these unprecedented times in education, we will have a large population of people who will struggle to find gainful employment. We need to look at the big picture and long-term effects COVID-19 will have on our communities, states, and country and make decisions based on what is best for the greater good.
194	1/27/2021	School staff	Yes	Please cancel the June 2021 Regents Exam due to the Pandemic. There is nothing normal about our current situation. I'm covering the curriculum the Best I Can, however, I'm going at a much slower rate. The students need "Brain Breaks" after being on Zooms for 6hrs a day, and I feel that giving the normal amount of homework would be cruel, after requiring them to be staring at a computer all day. Of course, the students that are from upper middle class homes that have their own rooms (workspaces) are doing much better with distance learning, then kids that are living in more challenging circumstances. Thank you for considering my opinion.
195	1/27/2021	Parent	Yes	As a parent with multiple children who have to learn remotely, the state needs to apply for the federal waiver related to state assessment and accountability. It is difficult for them to concentrate and stay seated for multiple hours. The distractions at home prevent them from learning to the best of their potential (younger kids screaming, etc.). It would be unwise, unhealthy, and an unneeded stress to test these children in order to meet graduation requirements
196	1/27/2021	Teacher	Yes	I believe it is important to note that these State Assessments, which are used to measure student progress and hold teachers accountable, were designed to be given during a normal year when traditional instruction was provided. These assessments do not take into account the varied instruction techniques that we, as teachers, have been forced to use since March 2020. Essentially, every school has had some virtual or hybrid instruction since last Spring. However, most teachers were never trained to provide online instruction. In addition, many schools and teachers still do not have the adequate resources to effectively teach remotely. It is a daily struggle for educators, and we are learning as we go each minute of the day. While we are doing the best we can, this past year has in no way been traditional. It is impossible to assume students have been able to receive the same amount and quality of instruction as they typically would.

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				<p>Not only has teaching remotely, virtually, and hybrid, been an ongoing challenge, but social emotional needs are at an all-time high. As educators, it is our job to look at what a child needs as a whole, not just academically. For many students right now, meeting these social emotional needs, and helping them feel safe and secure is the priority. Preparing student to take an assessment is not even on our radar. It is crucial for State Ed to not only recognize this but do everything in their power to not add more stress to students and teachers at this time.</p>
197	1/27/2021	Teacher	Yes	<p>I believe it is important to note that these State Assessments, which are used to measure student progress and hold teachers accountable, were designed to be given during a normal year when traditional instruction was provided. These assessments do not take into account the varied instruction techniques that we, as teachers, have been forced to use since March 2020.</p> <p>Essentially, every school has had some virtual or hybrid instruction since last Spring. However, most teachers were never trained to provide online instruction. In addition, many schools and teachers still do not have the adequate resources to effectively teach remotely. It is a daily struggle for educators, and we are learning as we go each minute of the day. While we are doing the best we can, this past year has in no way been traditional. It is impossible to assume students have been able to receive the same amount and quality of instruction as they typically would.</p> <p>Not only has teaching remotely, virtually, and hybrid, been an ongoing challenge, but social emotional needs are at an all-time high. As educators, it is our job to look at what a child needs as a whole, not just academically. For many students right now, meeting these social emotional needs, and helping them feel safe and secure is the priority. Preparing student to take an assessment is not even on our radar. It is crucial for State Ed to not only recognize this but do everything in their power to not add more stress to students and teachers at this time.</p>

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198	1/27/2021	District personnel	Yes	<p>It is of the opinion of my colleagues and I that</p> <ul style="list-style-type: none"> <li>All State level exams not be administered in the 2020-21 school year based on the aspects of fairness and equity. <ul style="list-style-type: none"> <li>The ability to obtain electronic devices and WiFi access was extremely limited during the first four months of school and instruction was impacted by it.</li> <li>Student attendance was an issue during those first four months as well because of not having a device.</li> <li>Attendance continues to plague the District as a large portion of our students are transient and need to work to send money back to their families in other countries, repay the people that brought them to America and help pay for their lives here in America.</li> </ul> </li> <li>Best choice <ul style="list-style-type: none"> <li>We need to continue the discussion on Regents exams. <ul style="list-style-type: none"> <li>The former pathways of either an Advanced Regents Diploma, Regents Diploma or a Local Diploma should be reinstated. <ul style="list-style-type: none"> <li>Most Colleges now are not even using the SAT or ACT scores due to equity. NYS should follow suit with the diploma offerings as well.</li> </ul> </li> </ul> </li> </ul> </li> </ul>
199	1/27/2021	Teacher	Yes	There should be no standardized testing.
200	1/27/2021	Teacher	Yes	I'd like to argue against having State standardized tests at the end of this year. I am a teacher and do not give these tests, but I know how remote learning has gone this year. We have all gotten better at it-- teachers and students, but I am concerned with the equity issue of high-stakes tests. My less advantaged kids had problems getting on line or with connectivity. They often are taking care of younger brothers and sisters or have some other home situation that impacts learning. Failing a final exam can have an impact on the students graduation and thus may have lifetime ramifications for lower income students. Please consider this in your decision.
201	1/27/2021	School staff	Yes	First let me say the next you for considering to not have stave testing this academic year. I am an 8th grade science teacher and this year has been very challenging for teachers, students and parents. In my 14 years of teaching I have never seen such a disastrous year! The work completion, understanding and perseverance is abysmal. I am seeing upwards of 50% failure rates with students some students having grades in the single digits or teens. We are a good school district and have never seen anything like this except for the occasional student once every few years. I know that the grades on a state assessment would have zero benefit for anyone in a year like this year. We have had great success on students obtaining a 3 or 4 in all my years on the state science assessment. This year we would not see those same results due to the lack of apathy of the students. Our attendance is not good and how would you even get students to school to take the test? We have full time home

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				<p>learners and even our hybrid kids could not be forced to attend on test day. I see absolutely no reason and no benefit for students to take the science assessments this year. It would not prove anything in my mind. However, if you want to want to prove how terrible this year was then go ahead with the test. The scores at the middle level will be lower than ever and the number of students completing the test will be lower and give you no true indication of student learning. I just don't see how you could possibly enforce that all students must take the test or how to make it electronic when we have a lab portion or how to get kids into school. The logistics alone are a nightmare! Please do not have the 8th science assessment this year, it is of no value to us teachers! Thank you for your time</p>
202	1/27/2021	Student	Yes	<p>Hi i'm currently an 11th grader at [REDACTED] and I have a few things to say about the Regents. Currently no one is really learning anything. We're still not fully used to this remote learning/hybrid and it's starting to become more difficult as time goes on. Me and many other students aren't really learning and aren't going to pass the the Regents. The Regents isn't an easy test and based on how we've been taught throughout this year and last year, you will not see a great average of passes. The regents needs to be cancelled because if they're aren't this will affect me and many other students mental health and more. I'm not sure why teachers and higher ups aren't taking into consideration of OUR FEELINGS as students. It's tough switch from one learning tactic to another, and then having to take a biased test that isn't easy is very stressful. Another thing to keep in mind is that there will be parents out there that will NOT want their children going to school at all. So if the tests go on, the raging parents will go on and students and just chaos. This is unfair that students aren't allowed to have any input on this situation, it's just unfair. The Regents needs to go!</p>
203	1/27/2021	Not specified	No	<p>In light of the ongoing pandemic and the impact it has had on our educational system it is critical that NYS is able to measure this impact. Without any measurements or metrics then how can we assess the impact?</p> <p>Therefore, I strongly disagree with the request for a waiver.</p>
204	1/27/2021	Parent	No	<p>I am a parent of a third and sixth grader in public school in [REDACTED].</p> <p>I am very concerned about the push to avoid testing for accountability and progress. Now more than ever, New York State needs to examine the impact of remote learning on students' education.</p> <p>The State has decided to keep schools open remotely or in hybrid, rather than close them down entirely (and essentially pause the school year), based on the assumption that learning can still happen outside of school. This fundamental premise underlies the State's entire approach to school guidelines, opening and closing. But what if students are not actually learning remotely? Don't we need to know what is working and what isn't?</p> <p>If the concern with testing is that students and teachers should not be penalized for poor performance during the pandemic, then that should be the understanding this year: no penalties for poor performance, New York</p>

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				<p>DOE should advocate for that, and should seek an exemption from penalties. But what possible, good-faith justification is there for avoiding testing and assessment? Everyone who participates in this system - students, teachers, all taxpayers - deserve the accountability that testing provides. Now is not the time to bury our heads or avoid assessing the impact that remote learning is having on our children's education. I am disappointed and concerned that New York is seeking this exemption.</p>
205	1/27/2021	School board member	No	<p>As a board member, community member, I understand and appreciate the difficult situation the state &amp; the country is in, however, I am quite concerned that 3-8 testing stands a chance of being cancelled again. Although it will be (likely) evident students have fallen behind, I think we need an accurate measurement of how far. If there is another way of examining, statewide, where students are, I am all for it. We must somehow measure and follow the facts.</p>
206	1/27/2021	School staff	No	<p>My name is [REDACTED] I am primarily a high school mathematics teacher. I do occasionally teach a course at the middle school level some years. This year I am teaching AP Calculus AB, Honors Common Core Algebra II, Honors Intro to Calculus, Math 8, AIS 9, and SAT/ACT prep. I have been teaching for 14 years in NYS and have also been an administrator for four additional years. I am emailing regarding the administration of NYS Regents exams for the 2020-2021 school year and frankly, other years to follow. It is clear with these unprecedented times that education has suffered and will continue to suffer. It should not have been surprising that this current school year was going to be challenging. I was surprised when NYS didn't proactively modify curriculums so that students would be able to adapt to a different learning style while still being held accountable, on a more manageable and appropriate level, for learning. I feel it is important to support students during these times, but also to teach them how to push through and reach for something attainable and tangible. It is my opinion that NYS should have shortened all curriculums this year so that students could still be taught, but at a more appropriate pace that better suits the on-learning and/or hybrid model. I thought a Regents at the end of the year that reflects that shortened curriculum would have been appropriate. Cancelling a Regents exam gives students no incentive to work during the school year and would cripple them when moving forward to the next level the following year, especially with sequential courses like math and foreign language.</p> <p>Because curriculums weren't shortened earlier this year, it seems appropriate to cancel the Regents for June 2021 at this point. It is imperative moving forward, that curriculums be adjusted to make next year's school year seem doable for students who have struggled this past year. Please consider for the next few years restructuring (modifying) course curriculums so only the most important of topics are included. It is appropriate and in the best interest of our teachers and students. The mental health of everyone is in jeopardy right now. Moving into future years of education with unrealistic expectations and demands is not an option. At the same time, cancelling Regents and offering no accountability each year is not an option as well. You have to find the balance</p>



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				so that students have incentive to work and teachers feel like the job their tasked with is doable and appropriate.
207	1/27/2021	Parent	No	<p>We are parents of twins in [REDACTED] middle schools. Our son [REDACTED] is a 6th grader at [REDACTED]. Our daughter [REDACTED] is a 6th grader at [REDACTED]. I am writing to register my disagreement with the waiver. My husband and I believe that the state tests should be given for the current school year 2020/2021. We must assess our students and address the learning loss brought on as a result of the pandemic.</p>
208	1/27/2021	School staff	No	<p>As elementary English as a New Language (ENL) teachers in the [REDACTED] District, we feel administering the NYSESLAT in the Spring of 2021 is imperative so we can measure the progress of our ENL students. Due to the coronavirus pandemic, the NYSESLAT was not administered in the Spring of 2020, and as a result, teachers and students alike lost a valuable opportunity to evaluate their English language growth.</p> <p>Given the two-week testing window for the Listening, Reading, and Writing portions of the NYSESLAT, and the four-week testing window for the Speaking portion of the NYSESLAT, we feel the NYSESLAT can be fairly and safely administered while strictly adhering to all social distancing protocols proscribed by the [REDACTED]</p> <p>Furthermore, we strongly advocate giving even remote-only students the opportunity to take the NYSESLAT, so that ENL students who wish to demonstrate their English language skills are given an equal opportunity to do so on par with their in-person peers.</p> <p>However, given the current health and safety concerns, we also feel it is the right of the students and parents participating in remote-only learning to decline an invitation to in-person NYSESLAT testing if they wish to do so.</p>
209	1/27/2021	School staff	No	<p>[REDACTED] was able to plan and administer AP Exams last May. They did this virtually, with only 2 months notice, throughout the entire country (and beyond). Given the amount of time that NYSED has to plan before the June Regents period, I think that they should be able to come up with a system similar to the one used by [REDACTED]. Perhaps there needs to be adjustments made to required content, but NOT giving the Regents Exams again this year would be a huge mistake for many reasons</p>
210	1/27/2021	Parent	No	<p>As a public school parent of 2 kids in [REDACTED] I strongly believe state assessments need to be held for grade 3-8 and Regents exam should be administered this spring. The state test is a way for the [REDACTED] to be held accountable for successes and failures. As a parent, I can use the state test to see how my child is doing by universal standards in this country. This is important especially this year as many teachers are not giving comments on work and school districts such as [REDACTED] in [REDACTED] are not even giving numerical grades this year.</p>

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				<p>They have opted for a pass/fail grading policy. Parents are tired of [REDACTED], schools and teachers not being held accountable for failures in education for 2019/2020 and now 2020/2021. Families need transparency at this time regarding our children's education so that we can assess if the public school system is adequate for are kids. In addition to this, parents already do have the ability to opt out if the test if they choose.</p> <p>The Regents exam also should be given as many students have worked very hard this year to excel in their classes and should be assessed fairly. It is not fair to older students to disregard their achievements in order to avoid accountability for schools that have failed them.</p>
211	1/28/2021	Teacher	Yes	<p>I am writing in support of the NYSED request for a federal waiver allowing the Department to cancel 3 - 8 assessments and Regents exams this year. As a teacher in the [REDACTED], I have seen first hand the effects of inequity that has been brought about due to the pandemic. In our area alone, some schools have been able to offer daily in person instruction to students in grades preK - 6 while others have only been able to offer as little as one in person day per week for this group. At the secondary level, the number of in person days in this region ranges from 1 to 3 per week. Constrast this with more affluent areas of the state such as Long Island where many schools have been able to offer in person instruction to every student every day AND those who are learning remotely have been placed in their own section. In my classroom, those who are learning remotely are being taught in the same section as the in person learners. This makes for very disjointed lessons and it takes an extremely long time to ensure that students are mastering essential content.</p> <p>I have witnessed high school students who have to babysit younger siblings who are not able to attend school in person daily and parents have to work. How is a high school student learning remotely supposed to learn their own work while watching a 5 year old? Of course we can say parents should have made other arrangements, but that does not change the reality that they did not, and perhaps could not as there is not adequate child care in our area under regular circumstances. How is this equitable?</p> <p>Learning in person is certainly the most effective method, and those who have been full remote by choice or by quarantine order have been struggling more to succeed in my class than those who have been able to attend in person at least part of the time.</p> <p>In math, it has been extremely detrimental for students, particularly in Geometry in my experience, to not be able to explore hands on with paper, pencil, compass, and straightedge. There are gaps in their understandings through no fault of their own and through no fault of their teachers and to test them on a full Geometry Regents exam at the end of the year, and to tie this exam to APPR scores is unfair to all involved. Instead, it makes sense to have teachers work with students individually to meet their unique learning needs, meeting them "where they are" and intervening to fill in gaps without the pressure of needing to race to a finish line that is the Regents exam at the end of the year. In this way, we can continue to grow their understandings into next year with focused RTI plans so that by the end of high school they will be caught up and prepared for college and/or career.</p>

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				I implore you to continue to advocate for students, teachers, and families in New York State by following through on the process of applying for the ESSA waiver. Thank you so much for all that you do.
212	1/28/2021	School staff	Yes	<p>I am the Elementary School Counselor and Social Worker at [REDACTED]. Previously, I was the Middle School Counselor for about 15 years. In that time, I've seen the [REDACTED] and the [REDACTED] take every challenge thrown our way and achieve success. The staff, the community and the students are a hardworking, resilient, and resourceful bunch who always attack obstacles head on. I'm proud to be a member of this very rural and very isolated community.</p> <p>Having said that, I have also seen a pretty significant increase in anxiety across the board. Staff, parents, and students have been impacted physically, emotionally, and psychologically by this epidemic. There have been job losses, decreases in income, increase in stress, anxiety and the unknown. This would certainly fall under the heading of Chronic Stress for all involved. While our teachers are giving their usual 120%, the stress has taken a toll. While our parents have been giving their best at home, the stress has taken a toll. The students, who are ever resilient, have been impacted by this epidemic in ways we won't know for years down the road. I feel confident that everyone is doing their best – we all want our students to succeed. I also believe that we should mitigate the stress on our children in any way we can.</p> <p>Our kids take the state testing very seriously. I remember my middle daughter throwing up before the state test, regardless of me telling her she just needed to do her best, because she was afraid she'd let her teacher down if she didn't score well (she absolutely loved her teacher that year). I truly don't see the benefits of the NYS Tests outweighing the huge toll on our already overburdened kids. Thank you so much for your consideration.</p>
213	1/28/2021	Teacher	Yes	<p>I am writing to comment on giving the NYSESLAT to ELLs this spring, 2021. We use the NYSESLAT to measure Adequate Yearly Progress of ELLs throughout NY State as a basis from which to inform instructional practices. Additionally, NYSESLAT scores are used by the state to examine district efficacy in ELL instruction. This year has presented educators, students, families, schools, and districts with extraordinary challenges. As an educator of English Language Learners I have seen families of ELLs, usually marginalized, struggle with childcare, lost wages, as well as COVID19-related health crises.</p> <p>As an ELL educator, it has been incredibly challenging to teach this year. On a daily basis, I work with young children struggling to manage academic challenges but also technological difficulties: unstable wifi; old wifi; living in an area with no wifi; living in a part of a house without wifi that is dependable. Additionally, our students may be with a babysitter who is not able to help with schoolwork. They may be in the care of an older sibling. They</p>

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				<p>may be responsible for a younger sibling. There may be less in the refrigerator due to lost wages. Many of them have lost family members, friends, or neighbors.</p> <p>Administering a state test to these children is problematic. It will not adequately measure yearly progress because their progress has been impeded by the factors listed above. It will cause further stress on our ELL populations and they are already stressed enough.</p> <p>Giving the NYSESLAT this year is nonsensical.</p>
214	1/28/2021	Teacher	Yes	<p>It is imperative that we obtain a waiver for all assessments and policies that will harm schools.</p> <p>There are huge inequities among districts with some being completely remote, others hybrid, and some students remote due to family and health concerns. Not all districts are able to provide their students with all of the technology and resources that are needed to operate like this.</p> <p>Students are being asked to learn in a completely new way. Not all of them have the support they need at home and many interventions that take place in a normal school year are not available. They have significant gaps due to the end of last school year as well as because of the way learning is taking place this year. It would be detrimental to our children to make them feel inadequate or stress them out just to take an assessment. They have already been through enough. We need to consider the mental health and safety of our children first and foremost.</p> <p>Schools have been tasked with an incredible feat. They have worked so hard to give their students all that is possible. They should not be targeted and penalized when they have stepped it up and worked tirelessly.</p>
215	1/28/2021	Teacher	Yes	<p>We should waive Regents and here's a few reasons why:</p> <ul style="list-style-type: none"> <li>• We are still in the midst of a pandemic that has adversely impacted BIPOC members of our school community. Measures have yet to be taken to adequately ameliorate the economic and emotional impact the pandemic has had on an already underserved population.</li> <li>• The setting in which students have learned has changed multiple times, leading to a lack of consistency and continuity in addition to frequent interruptions of curriculum, therefore precluding students from experiencing the breadth of a typical curriculum.</li> <li>• Many students have suffered from a lack of speedy internet and/or access to suitable devices. Additionally, many students share devices with other school-age family members in the household.</li> <li>• As a result of partial and full shutdowns, many students have been forced to work during and/or after the school day in order to support their household. Students without economic privileges cannot be expected to perform at the same level as their wealthy peers when their access to resources is far more strained and complicated.</li> <li>• Schools across the state in urban districts serving primarily BIPOC families have largely remained remote, placing them at a disadvantage when compared to suburban or rural schools across the state that serve</li> </ul>

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				<p>primarily white and/or wealthier families. The "playing field" has never been level, to be sure, but the imbalance is more stark than ever as a result of the COVID-19 pandemic.</p> <p>Would waiving state exams benefit our students? Of course, but for more than the reasons you might think:</p> <ul style="list-style-type: none"> <li>• Waiving regents would provide school communities the necessary flexibility required to serve students social-emotional needs.</li> <li>• Gaps that currently exist and are being exacerbated by the pandemic could be the focus of teaching through the close of the school year</li> <li>• Student anxiety (and overall mental health) is presently strained to the brink. Social separation and isolation, economic anxiety, and the general challenges posed by remote learning have contributed to widespread trauma experienced by our school community. Scheduling state exams would only enhance the collective anxiety experienced by our school community.</li> </ul>
216	1/28/2021	Parent	Yes	<p>I agree with the proposal to waive state assessment testing and regents exams. My son is a 9th grader at [REDACTED] and is definitely not learning the material as he would if he was in school, full time, as normal. Due to this, taking regents exams will not do him or educators any good because undoubtedly he and his peers will not have learned the material needed to be successful.</p>
217	1/28/2021	School administrator	Yes	<p>I am writing in support of the NYSED request for a federal waiver allowing the Department to cancel 3-8 assessments and Regents exams this year. As a school administrator in our high school we have an unprecedented amount of course failures. It is actually 4 times the amount of failures we had at this time last year. We have over 500 of our students who are learning remotely and the majority of them are not even logging on or engaging at all. We have conducted countless home visits and for some are still not seeing any improvement. In our district, our hybrid students are only allowed to attend school in person 2 days per week while smaller districts down the road and in other parts of NYS have students attending 4 days per week. This is not equitable at all for our students. While our teachers are working tirelessly to perfect the remote/virtual instruction, unfortunately NOTHING will ever equate to students physically in a classroom with a trained teacher. The pandemic has thrown households and parents into the field of education and they have had to take on the role of a teacher and they are not trained or equipped to do so. I could go on and on about the inequity of all of this and how our students, to no fault of their own, will not be properly prepared for a Regents exam.</p> <p>I beg you to consider the inequities across the state with the number of hybrid days some districts are allowing and hope that you realize not all NYS students are being prepped for these high stakes exams equally. We ask that you continue to advocate for students, teachers and families in New York State by following through on the process of applying for the ESSA waiver.</p>

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218	1/28/2021	School staff	Yes	I am writing today to state my strongly held belief that all state assessments should be waived this year. This school year has been unlike any other. Teachers have been doing their absolute best, but it is completely unreasonable to be holding us accountable to the same standards in this climate. Most of us see our students in person less than half the normal time. The assessments cannot be given. We cannot act like this is a normal year when it is anything but that.
219	1/28/2021	Other educator	Yes	I am writing on behalf of our [REDACTED] students and their families in response to the request for the waiver for the 2021 State Assessment. Our community faced daunting inequities that have widened the opportunity gaps our students face - from technology access, to inequitable state aid, to food and employment insecurity, to inadequate health care in the face of a pandemic, to the disproportionate rate at which COVID has impacted black and brown people/impoverished areas/urban communities, to the heightened awareness of social injustice currently plaguing our nation and the impact that has all had on our students' ability to equitably access their education. I implore your to please take this into consideration when making this important decision.
220	1/28/2021	School staff	Yes	The current focus of education should have nothing to do with standardized assessments. Rather, districts should be attending to children safely attending school, filling in learning gaps created by extended absences, and supporting families. The typical benchmark/formative and summative assessments completed throughout the school year are more than sufficient at guiding instructional practices. State assessments with the intention of teacher/district accountability should in no way be a thought, focus or additional burden for students, parents or educators at this time. And to be honest, even if we're all in school full-time next year, the effects of this pandemic on education will be felt for a decade. Future efforts should be focused at reconnecting students and families to schools (by the way, Child Protective Services are of no help to school districts in regard to allegations of educational neglect), as there is significant concern that many students and families have completely disengaged from education at this time, and re-engagement post-pandemic will need nothing short of a miracle. Therefore, I strongly believe that ALL assessments for the 2020-21 school year should be cancelled. I also strongly believe that district accountability requirements for the 2020-21 school year be waived.
221	1/28/2021	Other	Yes	Please make sure ALL state assessments are waived!
222	1/28/2021	School administrator	Yes	Please consider suspending the testing requirements associated with ESSA. There have been many interruptions in the process of teaching and learning and it would be unfair to children to have them participate in standardized exams when districts are having difficulty standardizing the decimation of the curriculum. This speaks to the notion of equity during this unprecedented time.
223	1/28/2021	School administrator	Yes	Is it possible to waive the Checkpoint A and B World Language requirements as well if the other exams are waived?

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224	1/28/2021	Teacher	Yes	<p>As a teacher of 22 years, I am aware that it goes without saying that this past year of teaching has been the biggest and most challenging that I and other educators have ever experienced. I am confident that you are aware of this. What I would like to focus on is the impact I have seen this have on my students in the 2nd and 3rd grade. For the following reasons, I feel strongly that State Assessments should not be administered this year:</p> <ol style="list-style-type: none"> <li>1. Inequities in learning and academic practice. With already glaring inequities in our culture involving socioeconomic and racial lines, the pandemic has created an even larger disparity for our learners.</li> <li>2. Social and Emotional well being. We are a nation that does not easily recognize the need for social and emotional health to be at the forefront of learning. Students cannot do their best learning when they are being tossed back and forth between remote and in-person, trying to engage through a screen and being disengaged from peers and their social support groups.</li> <li>3. Increased sense of anxiety and worry. The parents are stressed. The teachers are stressed. And, as a result, the children are stressed when it comes to learning and "not falling behind". As if anyone is getting ahead right now. I see a group of learners who worry, daily, about the world around them. We cannot hide from them what is happening in the world, but we can soften the blow. Asking them to sit through assessments beyond the data already being collected by classroom teachers will only add to the stress, and not allow for accurate learning data to be collected. This is an expensive, time consuming undertaking to collect information that is not going to be an accurate assessment of their true understanding.</li> <li>4. State assessments are one snapshot of a learner, and do not reflect all the meaningful things that we could be focusing on with students right now. Instead, let us focus on teaching engaging lessons around civic engagement, kindness, empathy, community, and the myriad of other "skills" that are less tangible to assess but so important in our lives. Modeling and teaching them how to deal with difficulties and challenges, self calibrate when they are feeling emotionally overwhelmed and so many other things will have much more lasting effects in their lives, and the lives of those around them.</li> </ol>
225	1/28/2021	Teacher	Yes	<p>As an educator, it is my professional opinion that ALL state exams are waived this year. Please see below for my following comments:</p> <ul style="list-style-type: none"> <li>• We are still in the midst of a pandemic that has adversely impacted BIPOC members of our school community. Measures have yet to be taken to adequately ameliorate the economic and emotional impact the pandemic has had on an already underserved population.</li> <li>• The setting in which students have learned has changed multiple times, leading to a lack of consistency and continuity in addition to frequent interruptions of curriculum, therefore precluding students from experiencing the breadth of a typical curriculum.</li> <li>• Many students have suffered from a lack of speedy internet and/or access to suitable devices. Additionally, many students share devices with other school-age family members in the household.</li> </ul>

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				<ul style="list-style-type: none"> <li>As a result of partial and full shutdowns, many students have been forced to work during and/or after the school day in order to support their household. Students without economic privileges cannot be expected to perform at the same level as their wealthy peers when their access to resources is far more strained and complicated.</li> <li>Schools across the state in urban districts serving primarily BIPOC families have largely remained remote, placing them at a disadvantage when compared to suburban or rural schools across the state that serve primarily white and/or wealthier families. The "playing field" has never been level, to be sure, but the imbalance is more stark than ever as a result of the COVID-19 pandemic.</li> <li>Waiving regents would provide school communities the necessary flexibility required to serve students social-emotional needs.</li> <li>Gaps that currently exist and are being exacerbated by the pandemic could be the focus of teaching through the close of the school year</li> <li>Student anxiety (and overall mental health) is presently strained to the brink. Social separation and isolation, economic anxiety, and the general challenges posed by remote learning have contributed to widespread trauma experienced by our school community. Scheduling state exams would only enhance the collective anxiety experienced by our school community.</li> </ul>
226	1/28/2021	Teacher	Yes	<p>I am working in a school that see students in person in different groups once every three weeks in person. The other two weeks on-line or remote. I do not feel that the students have the adequate learning environment to be tested across the board on New York State Exams, for English Language Arts, Mathematics, and Science for this 2020-2021 school year.</p> <p>I believe that when we all go back to full time in class instruction, State exams would be more appropriate.</p>
227	1/28/2021	School staff	Yes	<p>It is absolutely ludicrous to think this is even in discussion as a possibility of continuing with state assessments. Our students and teachers are working so hard to adjust to what our new models of education look like. Teachers are having to focus more on social/emotional health even more than we did before with our students and can't possibly cover our content to the extent we would like to, but priorities tend to shift in a pandemic. Students are working with far less support in many instances as they learn remotely, since a parent or a video can't replace having a teacher in person. There are many more skills that our students are learning that can not be captured in a standardized assessment about resilience and flexibility- skills that will benefit them immensely as adults long after the content we assess them on is forgotten. Please consider what is most important right now. This data is not it.</p>
228	1/28/2021	Principal	Yes	<p>I'm not sure how we could administer the state tests when on any given day we only have 40% of the student body present. Teachers have already had to scale back on what they teach in their class because of hybrid/remote models. These tests would take even more time away from instruction. It does not seem feasible, practical, or useful.</p>



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229	1/28/2021	Principal	Yes	As a dynamic educator with a passion for improving student outcomes and engaging in practices for perpetual learning, I am requesting that the US Department of Education waives testing students during 20-21. As educators, we should always want to do what is best for students, and waiving the tests for 20-21 would be in the very best interest of all students.
230	1/28/2021	District personnel	Yes	<p>Thank you for seeking public comment regarding the waiver to be sent to the USDE regarding testing. I serve as an administrator in NYS and I am a proponent of the NYS tests under normal circumstances. I believe they give us good information that can be used to assist us in our curriculum and instruction. This year, however, the data would be of little use. We have great numbers of children who have been forced to quarantine and while we have done our best to educate them, there is no substitute for being in school. The same is true for remote students. We are offering dedicated remote education that is robust and rigorous but those children are not physically with a teacher and therefore some of the subtle cues that teachers use to inform their instruction are lost. Finally, the way that school is being carried out varies greatly from district to district. We would be unable to make valid or reliable comparisons.</p> <p>As per NYS mandates, our students who are in school are separated by 6 feet. This means they are here approximately 50% of the time. To use valuable in-person instruction time to test would take away from their learning opportunities that are greatly needed as we work to make sure our students will be able to compete in society when they leave school. Please go forth with the waiver request for this year and we will all hope that by 21-22 we are able to resume schooling that allows for more time with our students. That would be an ideal time to reinstitute the tests.</p>
231	1/28/2021	District personnel	Yes	<p>Thank you for seeking public comment regarding the waiver to be sent to the USDE regarding testing. I serve as an administrator in NYS and I am a proponent of the NYS tests under normal circumstances. I believe they give us good information that can be used to assist us in our curriculum and instruction. This year, however, the data would be of little use. We have great numbers of children who have been forced to quarantine and while we have done our best to educate them, there is no substitute for being in school. The same is true for remote students. We are offering dedicated remote education that is robust and rigorous but those children are not physically with a teacher and therefore some of the subtle cues that teachers use to inform their instruction are lost. Finally, the way that school is being carried out varies greatly from district to district. We would be unable to make valid or reliable comparisons.</p> <p>As per NYS mandates, our students who are in school are separated by 6 feet. This means they are here approximately 50% of the time. To use valuable in-person instruction time to test would take away from their learning opportunities that are greatly needed as we work to make sure our students will be able to compete in society when they leave school.</p>

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233	1/28/2021	District personnel	Yes	<p>Thank you for seeking public comment regarding the waiver to be sent to the USDE regarding testing.</p> <p>I serve as an administrator in NYS and I am a proponent of the NYS tests under normal circumstances. I believe they give us good information that can be used to assist us in our curriculum and instruction. This year, however, the data would be of little use. I am the administrator that oversees the Alternative Assessment. As you are aware the Alternative Assessment is designed for students with the most severe disabilities. Our district also has a number of students who are being instructed remotely who fall within this category. Remote instruction is beyond difficult for students who have attention and communication difficulties. The struggles that these families are experiencing at this time are real issues and I feel we need to account for the discrepancies in remote and hybrid instruction. Please go forth with the waiver request for this year and we will all hope that by 21-22 we are able to resume schooling that allows for more time with our students. That would be an ideal time to reinstitute the tests.</p>

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234	1/28/2021	Teacher	Yes	<p>I understand that there could be some discussion if Standardized examinations should be administered this school year. I would like to answer this by saying that perhaps in the northern part of the state where the schools have not been impacted as much as NYC, there might be room to argue that standardized testing should be done. I am a teacher at [REDACTED] and I can tell you that infection rates have been consistently high in our mostly Latino neighborhood. There have been many deaths and very understandably most families have chosen the remote learning option to prevent more deaths in the family.</p> <p>With the infection rate in [REDACTED] hovering near 7% since September [REDACTED] did the right thing to shut down the School Buildings in November 2020. On the high School level the Schools have remained in the remote model since then, I believe that to require standardized testing is insensitive, putting an additional burden on the families of students who are grieving for lost relatives and just trying to survive emotionally and economically. Please take notice that many of our students have needed to take on jobs to supplement the family's income due to the breadwinner passing away or losing his employment. Additional hurdles NYC students have faced have been schedules that have had many changes as well as remote learning obstacles due to missing/ or defective devices and the lack of wifi.service.</p> <p>As a teacher, I realize that remote learning is inferior to face to face instruction which can only necessitate a slower pace to reinforce essential concepts. If standardized exams are required this would force us to push forward to get through the material even if the previous material had not been mastered. This can only have a negative result on our student's learning. For all these reasons and many more which would make this letter much too long, I implore you, please do not make standardized exams required at least till the end of this academic year.</p>
235	1/28/2021	Primary Stakeholder Group	Yes	<p>I am writing as a teacher in an [REDACTED] school who feels that the NYSED should provide waivers for the Spring 2021 state assessments, including the high school Regents exams. Here are the reasons why:</p> <ul style="list-style-type: none"> <li>• We are still in the midst of a pandemic that has adversely impacted BIPOC members of our school community. Measures have yet to be taken to adequately ameliorate the economic and emotional impact the pandemic has had on an already underserved population.</li> <li>• The setting in which students have learned has changed multiple times, leading to a lack of consistency and continuity in addition to frequent interruptions of curriculum, therefore precluding students from experiencing the breadth of a typical curriculum.</li> <li>• Many students have suffered from a lack of speedy internet and/or access to suitable devices. Additionally, many students share devices with other school-age family members in the household.</li> <li>• As a result of partial and full shutdowns, many students have been forced to work during and/or after the school day in order to support their household. Students without economic privileges cannot be expected to</li> </ul>

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				<p>perform at the same level as their wealthy peers when their access to resources is far more strained and complicated.</p> <ul style="list-style-type: none"> <li>Schools across the state in urban districts serving primarily [REDACTED] families have largely remained remote, placing them at a disadvantage when compared to suburban or rural schools across the state that serve primarily white and/or wealthier families. The "playing field" has never been level, to be sure, but the imbalance is more stark than ever as a result of the COVID-19 pandemic.</li> </ul> <p>This would benefit our students for the following reasons:</p> <ul style="list-style-type: none"> <li>Waiving regents would provide school communities the necessary flexibility required to serve students social-emotional needs.</li> <li>Gaps that currently exist and are being exacerbated by the pandemic could be the focus of teaching through the close of the school year</li> <li>Student anxiety (and overall mental health) is presently strained to the brink. Social separation and isolation, economic anxiety, and the general challenges posed by remote learning have contributed to widespread trauma experienced by our school community. Scheduling state exams would only enhance the collective anxiety experienced by our school community.</li> </ul>
236	1/28/2021	Teacher	Yes	<p>Please waive the standardized Regents exams. Students are already stressed more than I have ever seen during my 20 + years of teaching. A Regents exam would add a level of stress that would surely overwhelm some and dishearten many.</p>
238	1/28/2021	Parent	Yes	<p>As a retired teacher and parent, it is imperative to eliminate state testing in 2020-21 and beyond. State testing only serves one learning style. Students who take longer processing and retrieving information are at a severe disadvantage on standardized testing. It is also a severe disadvantage to students with disabilities that have various learning styles and can demonstrate acquisition of knowledge in a different way than paper and pencil tests. All Regents exams need to be eliminated completely and formative assessments should be used to evaluate student acquisition of knowledge.</p>
237	1/28/2021	Not specified	Yes	<p>I am in full support NYSED's waiver application from the state tests for students in grades 3-8 in ELA and math, and Science tests in grades 4 and 8, and the NYSESLAT tests. The students (and teachers) are learning in unprecedented times with a global pandemic. Many students are learning remotely and others are in person, but with very strict social distancing and mask wearing protocols. The students are already well behind where they should be. Failing state tests will do nothing to help them feel better about themselves, nor will the results give us any useful information. Thank you for allowing and considering public input on this very important topic.</p>

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239	1/28/2021	Teacher	Yes	As an ENL teacher, I think that it would be detrimental for our students to take the NYSESLAT this year. I honestly don't believe that it is equitable for students to be held accountable when they are still trying to navigate through this pandemic. So many of our ELLs families are struggling at the moment and I fear that testing them might add another layer of anxiety that they are not prepared for. Even though this will inform us and the data is necessary, there must be another way that we can assess their learning without placing these burdens upon them.
240	1/28/2021	Teacher	Yes	I do not think we should have state testing this year. My students need every minute of instruction I can provide. They don't need the stress or distraction from this that 4 or more days of testing cause. We are not able to cover as much or as deeply as every other year. I don't think they would feel prepared. Waive the requirement. Let me TEACH!
241	1/28/2021	Not specified	Yes	I feel it is not appropriate for the state to require schools to give state assessments to students during the 2020-21 school year. Many schools in the state have modified school days due to Covid 19. Some schools are full remote and some are in a hybrid mode where only half of the students are in person and the other half are remote. Some students have opted to be fully remote. The students are not prepared to complete these assessments. In addition, it is not safe to have students complete assessments in school and be socially distant.
242	1/28/2021	Parent	No	<p>This is a plea for the NYS Board of Regents to please offer Regents "credit by examination" in June 2021. Optional at least! Please.</p> <p>Cancellation of the Regents exams knocks the dedicated "credit by examination" students out at the knees. With no Regents test, they are ineligible for certain diplomas. My daughter is one of them. This is deeply personal and for the sake of public education. Lets make sure NYS public schools have ways to maintain their quality reputation and are able to respond to the needs of all types of students.</p> <p>Regents "credit by examination" is used in high schools when a student is placing into a sequence of courses. Students new to a district or students who are accelerated use the "credit by examination" option. With "credit by examination", these students are able to enter the sequence of study <u>AND</u> get Regents credit toward the degree they are striving for.</p> <p>My daughter is an accelerated, honors student. <i>If the Regents Geometry exam is not held in June 2021, she will not be eligible for the advanced diploma, as advised by the [REDACTED] Asst Superintendent.</i> This is a kick in the gut for a student who consistently achieves a 95 or higher in EVERY one of her classes, every year. To not be eligible for an advanced diploma, despite being a hard working advanced student, is demotivating and an incentive for honors students to perhaps find a better place in private schools; an "exit to quality".</p> <p>Thank you very much for finding a way to offer "credit by examination" in June 2021. Optional and on-line exams certainly could work.</p>

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243	1/28/2021	Parent	No	As a public school parently, I do no support eliminating or waiving assessments for Spring 2021.
244	1/28/2021	School staff	No	<p>I have strong negative feelings about applying for a waiver of testing requirements. I believe that eliminating testing last year decreased student engagement and teacher expectations of student achievement.</p> <p>I believe that these decreased expectations will disproportionately impact minorities and those of low social-economic status. I expect my government to make data-based decisions. What data exists that suggests lowering standards increases achievement? It is unethical to use a promotion of equality as justification for eliminating tests. At the end of the day, having these tests provides a small measure of accountability to our educational system to do their best every day. Minorities and the poor need their schools to bring their best everyday.</p>
245	1/28/2021	Parent	No	<p>I am the father of two children that work very hard to overcome the hurdles in life. As we all do. Especially the hurdles placed by the NYS Health Department on public schools in 2020-2021.</p> <p>It is a fact that an education consists of both successes and failures. Our next generation deserves to either be rewarded for their efforts by EARNING advancement to the next grade level OR accepting a failing grade. Both outcomes are ok and serve a great purpose to students. Our youth cannot learn without failure. The ONLY way we can determine if any academic year was a success or failure, is through the testing of knowledge. Waiving this critical element of education is only conceding an entire academic year and accepting for all, that 2020-2021 was a complete failure. I witnessed lots of successes in 2020-2021 the way many kids worked hard to do what they can from home. Yes, even without internet!</p> <p>I believe that waiving testing requirements would primarily teach all students that the building blocks of our existence, knowledge gained through perseverance and hard work, have become irrelevant in 2020-2021. Why? Because it was hard!?</p> <p>To avoid sending this poor lesson to every student in the great State of New York, please DO NOT waive any testing requirements. Our children will persevere and prosper as long as we teach them to overcome all obstacles and learn from both failures and successes. The solution is not a passing grade for all, the solution is for all to learn.</p>
246	1/28/2021	Primary Stakeholder Group	No	<p>I strongly urge that Regents be waived/canceled for the following reasons:</p> <ul style="list-style-type: none"> <li>• We are still in the midst of a pandemic that has adversely impacted BIPOC members of our school community. Measures have yet to be taken to adequately ameliorate the economic and emotional impact the pandemic has had on an already underserved population.</li> <li>• The setting in which students have learned has changed multiple times, leading to a lack of consistency and continuity in addition to frequent interruptions of curriculum, therefore precluding students from experiencing the breadth of a typical curriculum.</li> </ul>

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				<ul style="list-style-type: none"> <li>Many students have suffered from a lack of speedy internet and/or access to suitable devices. Additionally, many students share devices with other school-age family members in the household.</li> <li>As a result of partial and full shutdowns, many students have been forced to work during and/or after the school day in order to support their household. Students without economic privileges cannot be expected to perform at the same level as their wealthy peers when their access to resources is far more strained and complicated.</li> <li>Schools across the state in urban districts serving primarily BIPOC families have largely remained remote, placing them at a disadvantage when compared to suburban or rural schools across the state that serve primarily white and/or wealthier families. The "playing field" has never been level, to be sure, but the imbalance is more stark than ever as a result of the COVID-19 pandemic.</li> </ul> <p>Waiving state exams would benefit our students for the reasons below:</p> <ul style="list-style-type: none"> <li>Waiving regents would provide school communities the necessary flexibility required to serve students social-emotional needs.</li> <li>Gaps that currently exist and are being exacerbated by the pandemic could be the focus of teaching through the close of the school year</li> <li>Student anxiety (and overall mental health) is presently strained to the brink. Social separation and isolation, economic anxiety, and the general challenges posed by remote learning have contributed to widespread trauma experienced by our school community. Scheduling state exams would only enhance the collective anxiety experienced by our school community.</li> </ul>
247	1/29/2021	Teacher	Yes	<p>Please do the right thing and CANCEL the June Regents Exams and other state mandated tests for the rest of the year. This environment is so challenging for students and teachers that it would be unfair to assess students based on tests that were created for a normal academic year. The standards cannot and should not be the same a year like this. It is a victory just to get the kids to class every day and get some of the curriculum material covered adequately. It is unfair to place undue burdens on them to prepare for these standardized tests. In addition the remote level of instruction from district to district in different parts of the state is so wide and varied how can you assess any two groups of students by the same standard of knowledge when the levels of instruction are not standard? I urge you to use common sense and logic and cancel the Regents Exams for the 2020-2021 school year.</p>
248	1/29/2021	Parent	Yes	<p>I am a parent of a 3rd grader and a 5th grader who are both learning remotely this year. They have not been in a school building since March 13, 2020. While I applaud their teachers for all they do, I do not feel that they are prepared enough to take a state test at this time. In addition, I do not want my children going into school to take a test.</p>

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249	1/29/2021	Parent	Yes	<p>I am both a High School Teacher and a mother to a five- and seven-year-old and I can't begin to explain how difficult it has been for both my students and my own children to navigate through remote learning. No matter how hard I try, or my children's teachers try to make remote learning as normal and rigorous as possible, it does not resonate as such. There is nothing like being in an actual classroom, with a teacher and their classmates to learn from and socialize.</p> <p>This pandemic has brought forth a lot of struggle, in that many students lost loved ones or have had COVID themselves. They have missed weeks of instruction. Missing instruction during "normal" times was always very difficult to catch up with, never mind if they try to do it online now.</p> <p>In addition, many students, especially in the city, had trouble accessing devices or learning how to navigate them. Giving State Exams this year, will not truly test the students' knowledge properly. It will put them at a disadvantage, and it won't really show the capabilities of the students or teachers properly.</p> <p>Please take into consideration the flexibility of State Exams this year by not giving them across all grade levels.</p>
250	1/29/2021	Teacher	Yes	<p>As a 35 year veteran teacher, I fully support the elimination of NYS testing this school year.</p> <p>In my District, we are finding the hybrid learning model to be ineffective. Students do not regularly attend class and the administration has been ineffective at changing the attendance patterns of many. The time it takes to instruct students virtually is a great deal longer so many of us are significantly behind where we would be under normal circumstances, despite condensing our various curricula. Doing science labs has become extremely difficult as students are permitted to attend virtually whenever they choose, so predetermined lab groups are ineffective. It is common to have only two students in a room on any given day. Doing demonstrations does not lead to the same level of understanding as doing the actual manipulation in a lab experiment.</p> <p>Given the above circumstances, I cannot imagine students being able to achieve well on a standardized test designed during a non-pandemic year. While my District is in relatively good shape comparatively, the level of inequity across the State speaks to the need to eliminate testing until the end of the pandemic, and potentially beyond.</p>
251	1/29/2021	Not specified	Yes	<p>Regents should be waived this year.</p>
252	1/29/2021	Not specified	Yes	<p>Please consider waiving the 2021 state assessments.</p>



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253	1/29/2021	Teacher	Yes	<p>I am writing on behalf of myself and my 11th grade students at [REDACTED] support NYSED's waiver request to release schools from ESSA mandates as related to grade 3-8 and Regents testing. My course, American Experience, blends the curriculum of American Literature with US History. Traditionally, my co-teacher and I have seen great success on both the ELA and US History Regents exams following a normal year of rigor and practice for those assessments. This year (much like the spring semester of last school year) is anything but normal.</p> <p>My students and their families have faced tremendous obstacles related to the global pandemic, as we've seen COVID disproportionately impact black and brown/urban communities across the country. Since last spring, I've witnessed my students attempt to navigate a widening gap of inequity stemming from a lack of readily available technology, to food shortages, and even eviction- which denies them normal access to their education. My students are at a particularly impossible impasse when the social, racial, and political unrest of society is heaped on top of the pandemic and educational roadblocks they already face. It's overwhelming and has been treacherous for many families in my city.</p> <p>New York State, please leave the assessing to us- the teachers who interact with our kids as frequently as the technology allows. We have the training and experience to best assess their proficiency and shortcomings. Many urban students are living without WiFi or have only recently been assigned a personal laptop due to nationwide chrome book shortages. We wouldn't ask law or medical students to take their assessments after receiving partial training- so why would we demand that high school students sit for state exams when they've not seen any semblance of traditional schooling this year?</p> <p>The issue facing schools during this pandemic isn't how well teachers are teaching or how much students are learning. It's about finding the balance between education and humanity during the most daunting era in American history. Trust that teachers across the state and country are working diligently towards equitable solutions every day. We know what's best for our kids, and state testing at any level isn't beneficial this school year- it's unjust. State testing data will paint an inaccurate picture of failure for New York state students.</p>
254	1/29/2021	Teacher	Yes	<p>As a New York State school teacher for nearly 30 years in the [REDACTED] and a parent of three children, I have seen many educational trends and changes through the years. After teaching remotely last year, this year I am especially thankful to come to work each day and interact with my Fourth grade students. Although the children are missing many of the regular activities we might do in an average year, they too are truly excited to come to school and learn each day. I can understand the need for standardized tests to evaluate progress and programs, but I feel strongly that testing is not a productive use of time for our students this year.</p>

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				Remote instruction is so new and many of the students are working from home for a variety of reasons. We could not fairly compare these two cohorts of students this year, or even compare individual students' longitudinal progress to tests that didn't happen last year. In the current climate we have been forced to prioritize many opportunities and procedures. Each time we do this we must look at the advantages and benefits to the children first. I cannot in my professional mind see the true benefit for children in taking these tests this year. If in fact testing should evaluate and drive our programs, I believe it would be best to refrain from testing the elementary students until the global pandemic is contained and data gathered can be used for a justified purpose.
255	1/29/2021	Principal	Yes	Thank you for taking this effort. I think it is important that these waivers be approved; the reliability of any results this year would be questionable, and the possible benefits would be far outweighed by the negative impacts identified in the waiver application.
256	1/29/2021	Not specified	Yes	The in person learning was not efficient to require this testing of students. The students will do poorly without having proper education for the school year. It's simply not fair and could academically affect students.
257	1/29/2021	Teacher	Yes	<p>As a teacher of US History I believe it would be unfair to conduct the 2021 June Regents - unless all students are back in school for live instruction. The environment students would take the Exam would be some varied that it would be biased . Some students have be totally remote in the comfortable setting of their home; some students may be in a blended environment through the year; and some students may be primarily in classrooms. Clearly the environments would provide advantages and disadvantages.</p> <p>I believe each school could provide a final exam to access student progress in a Regents based course.</p>
258	1/29/2021	Teacher	Yes	I am definitely in favor of the approval of both waivers. Our school district was hit pretty hard with COVID this winter. We struggled to keep the physical building open due to the limitations on staffing. Although we did everything in our power to keep the train moving, in reality, the students are struggling with a lot more than just adjusting to digital learning. There emotional and social needs are a main priority for us right now. As a math teacher, I do find value in administering state tests. In addition to it being a good skill for them to have, I find the data that is a result of the tests useful. However, in our current situation, I think these tests will only cause more stress on our students who cannot take much more.
259	1/29/2021	Teacher	Yes	<p>I am a high school social studies teacher at [REDACTED] I am emailing regarding New York State waiving the state exams for students in the spring and June of 2021.</p> <p>First, a standardized test is supposed to provide consistency for everyone taking the exam. Over the past year, consistency is the last things these students have had in their own lives, let alone in school. Some students are</p>

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				<p>hybrid, some are fully remote, some don't have access to internet. More importantly, their homelives have been uprooted with something no one was prepared for.</p> <p>How is it fair to put the pressures on these students to take the exams? Has anyone thought about the mental health of the students? They are dealing with far more important issues in their lives (surviving/caretaking/health/mental health), than a test during a pandemic.</p> <p>I don't see how the tests can be given out fairly or consistently, and isn't that the whole point? As educators, our priority is to put the students first, and I hope as the State Education Department, you can do just that. Put their needs first during these unforeseen circumstances and grant the students a waiver of ALL state exams, including the Regents.</p>
260	1/29/2021	Not specified	Yes	I feel they should be waived student are having a hard enough time doing school work let alone doing a regence exam or any of the other yearly test half the student since covid have started plate failing now due to not knowing how to use a chrome book or not the proper help with them through teachers and parents that have no clue what is going on with them
261	1/29/2021	Not specified	Yes	<p>As a 27 year educator, the disruption to student's education and emotional well-being caused by the pandemic is unprecedented. Students and teachers absolutely do not need to be subjected to State mandated tests when curriculum has not been able to be taught in a traditional setting. The disruption testing causes is mental, emotional and unnecessary especially this year.</p> <p>Please suspend testing this year. Resume next year if at all. We all need support not more stress this year.</p>
262	1/29/2021	Teacher	Yes	As a NYS ESOL teacher, I strongly support the flexibility requested for administering the NYSESLAT test in the 2020-21 school year. In those situations when it can be safely and fairly administered in person, the NYSESLAT should by all means be administered. The decision to hold all ELLs at the level they scored on the 2019 NYSESLAT or recently administered NYSITELL was the best possible under the circumstances of spring 2020. However, to make the same decision this academic year would lead to two years of students' levels not changing and so levels of ENL service not changing, and the longer this continues, the farther from the students' actual present level of English proficiency we drift. At the same time, I would like to reemphasize that if the NYSESLAT cannot be administered safely and fairly, then it should not be. First of all, do no harm.
263	1/29/2021	Teacher	Yes	<p>This year has been very challenging trying to teach in person and remote. The students that have been consistently in person I have been very pleased with their progress.</p> <p>Unfortunately, the families that decided to go remote were the families that most needed to be in school. We have also had a revolving door of kids go back and forth from remote to in person and visa versa.</p> <p>It is not realistic or fair to test these students with such a chaotic environment.</p>

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264	1/29/2021	Not specified	Yes	I encourage the decisions makers to waive all NYS testing for the 20-21. Our students have not had sufficient prep time and teachers are spread thin managing social emotional needs and teaching. i would rather educators devote their time to filling in gaps and making learning fun and safe. Thanks for your time.
265	1/29/2021	Other	Yes	<p>[REDACTED] is a New York City-based nonprofit that works with educators to create a more equitable society by fostering a culture of compassion, respect, and high expectations in public schools, so students who were once left behind can thrive.</p> <p>We write to you in support of both waiver requests on assessments and accountability designations. We must quickly let students and families know that they will be exempt from high-stakes Regents exams that would be unsafe to administer. We join thousands of petitioners in this request. As we await a response to waiver requests, we also urge the State to immediately waive Regents exams as graduation requirements for the current school year, extending last year's COVID-19 exemptions through August 2021.</p> <p>We partner with transfer high schools that serve students and families who have been disproportionately impacted by the pandemic. Schools and community partners have been mobilizing to meet basic needs, engage students who have had to find employment or take care of family responsibilities, address growing mental health issues, and adjust to virtual learning platforms.</p> <p>Any standardized test or accountability designation from this school year would not necessarily be an indicator of student learning or school quality, but rather an indicator of the inequity New Yorkers experience in disproportionate health effects, school access and engagement, and adequate learning environments. Schools have had to transition to community hubs in ways these assessments would never capture. National and state assessments have already been cancelled in light of more pressing concerns.</p> <p>Let's focus on getting through this tumultuous time without inaccurately appraising the efforts of our educators and unfairly enforcing the regular requirements for students in the midst of a highly irregular school year. The best way to support and hold schools accountable is to consider the current challenges facing students and educators and make comprehensive plans to meet their needs.</p>
266	1/29/2021	School staff	Yes	We are two elementary teachers from [REDACTED] each with over 25 years teaching experience. We feel it is, beyond question, a time to dismiss state testing. NYS decided to dismiss the January Regents, the precedence for this year has been set. If it is unjust to give high school students a state exam, it is beyond comprehension why you would think to give a state exam to an elementary student. We all know the specifics of why, we're not sure that an explanation is even necessary. One clear reason would be the absolute lack of routine allowed to have students learning in a consistent learning environment... they were home, then in

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				school, then learning at home with all of the distractions and parents who may help, but most likely, may not. Students had such an uneven 'playing field' in which to pick up skills over the past year, the word 'unfair' doesn't even begin to describe the degree of differences among students and their varying situations.
267	1/29/2021	Not specified	Yes	Are you kidding me?? That's all I have to say
268	1/29/2021	Not specified	Yes	It is inconceivable that the Government would even consider doing testing on our students this year due to the pandemic. With a myriad of school attendees being on full remote, hybrid-models and even some full attendance across districts, sets up an extremely biased and unbalanced approach to testing. Equity would be impossible to establish a standard base line testing which will lead to even further inequities, as some districts would be negatively effected by this. Couple this with an early shutdown last year and a unexpected shift to full remote catching many off guard and scrambling to reinvent and revise education and you have a recipe for inequality and penalization of the current student body and teachers forced to reinvent our entire educational process overnight. Give our schools, students, and teachers a chance to stabilize and bring the entire system back to a more balanced and healthy state. To do this any other way would be to unfairly assess all partners resulting in bias and in my honest opinion a flawed and unjust assessment. This is akin to the doctor making a diagnosis and then telling the patient to now operate on themselves using Neanderthal techniques.
269	1/29/2021	Not specified	No	I no longer have children in school. However, I am generally skeptical about how effective current online learning is. It seems to me that the results of standardized testing this year would be useful to assess the effectiveness of current educational practices. If I did have children in school now, I would value the knowledge about the progress (or lack thereof) made in school this year. I also feel that test scores in the aggregate could facilitate decisions about returning (or not) to in-person learning.
270	1/30/2021	Not specified	Yes	I think that students should not have to take the New York State regent this year as covid has changed how they learned new material this year and it would not be fair to them to be tested on subjects they could not be adequately taught in.
271	1/30/2021	Community-based organization representative/ member	Yes	<p>I am a community member, a parent of kids in HS and a teacher in another county.</p> <p>I read the draft and it makes a lot of sense. Everything should be waived including teachers' professional rating scores which are based on the students' progress.</p> <p>Another year without data on students and staff is fine, providing the schools are doing their absolute best to reach and try to engage students in my opinion.</p>
272	1/30/2021	School staff	Yes	<p>My name is [REDACTED] and I am a sixth-grade teacher in [REDACTED]</p> <p>[REDACTED] I am writing to urge you to apply for a waiver from 3-8 testing in New York State. The main reason is the negative impact on students that this testing will have. Due to the COVID-19 pandemic, many of my</p>

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				<p>students are already suffering from heightened anxiety, uncertainty, and doubt. The specter of a high stakes test will/would add to that stress. In addition to the students who suffer from anxiety under normal circumstances, this testing would add many typically grounded students. Many students face upheaval at home, interruption of lessons due to technical issues such as inconsistent internet capabilities, and difficulty adjusting to learning under COVID-19 protocols. From my personal teaching, I have had to scale down many lessons, teach using remote learning platforms, and reduce my close physical contact with students due to the protocols. A number of my students have endured quarantine this year. The isolation and interruption from this experience has had a profound emotional impact on those students.</p> <p>From a general education standpoint, I am concerned for all of the 3-8 students across the State. The pandemic has highlighted the inequities in our education system. Many students do not have laptops, dependable internet access, or much, if any, adult support. Since the pandemic has begun, through no fault of their own, many students have attended school remotely. For a host of reasons, there is no comparing the education these students are receiving compared to those students who have been lucky to be consistently in-person. In my own class, I have had several students who have been remote for periods of the year. I have had to teach these students over Zoom, while teaching my in-person students simultaneously. Another daily inequity is the range of teaching that students have received. Due to the protocols of having much smaller classes, there have been obvious teacher shortages. This has forced districts to use any qualified support staff to fill classroom positions. This has robbed many of the students who need specialized help of the support they need. Also, the situation has created hugely varied instructional quality for students in even the most highly effective districts.</p> <p>Finally, I would urge you consider some of the unintended consequences of having our 3-8 grade students endure the usual state assessments. One of the goals that I have constantly heard used for testing students yearly, is to have teaching centered around the very well developed learning standards. If teachers know that high stakes testing remains during the pandemic, many will turn to teaching to the tests. I am hoping, that this is exactly what the State wants to avoid. Additionally, with the anticipation of a high stakes assessment, many teachers will choose coverage of content over subject area mastery. With all of the hurdles, setbacks, and challenges of our current situation, it is a reality that to help students achieve subject/skill/topic mastery teachers have needed to spend more time with each individual standard. So, with a looming assessment, teachers will be forced to choose, in many instances, between mastery and coverage.</p> <p>I think I will end here. Again, when deciding to apply for the assessment waiver, I would urge you to consider the emotional and educational well being of our children. As you can tell, I am very passionate about this subject. I</p>

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				have been teaching fourth through sixth grade for the past twenty-five years, so I do have experience and and a deep understanding of children at this age.
273	1/30/2021	School staff	Yes	As a high school social studies teacher with over 20 years of experience teaching Regents classes, I believe the Regents Exam should be cancelled this year
274	1/30/2021	School staff	Yes	As a parent and teacher in the [REDACTED] it is my sincerely belief that students should not be asked to complete state assessments this school year. Regrettably we understand that not all schools are created equal. This year however, those disparities have become painfully obvious. It is impossible for the state to hold all districts to the same standards when there have been students who have been attending in person instruction for the majority of the school year, while others have been forced into remote learning since September, many with limited, sometimes inferior technology and some with limited to no adult assistance in the home. This year's focus, for many impoverished districts, has been to ensure students are safe, emotionally and physically, have eaten, and understand that although they have been forcefully kept from what many consider a second home, they are loved. Furthermore, without the basic tools that teachers use on a daily basis to reach those students who struggle with traditional learning methods, an end of the year state assessment would not only give us inaccurate data, but would further remind students of their shortcomings, though this year specifically, it is through no fault of their own. It is for the above mentioned reasons that I strongly believe that students should not be asked to participate in state assessments at the end of the school year.
275	1/30/2021	Parent	Yes	I have triplets in 10th grade in NYS. When their school finally reopens on March 1, it will be almost a year since they have been in a classroom. Although their education was better this year than last spring, they are still at a disadvantage compared to high school students in other schools. Throughout this closure, I have been paying for tutoring services for my one son with an IEP. The majority of students in my children's school absolutely could not afford to do the same. As a school psychologist, I can tell you that there are many many kids not attending school at all. Despite letters, emails, phone calls, home visits, CPS calls—these children continue to skip school. Maybe because their parents feel remote learning is not worthwhile. Or perhaps their children are home alone during the day so they can work and there is nobody to make sure they get on. There are so many different circumstances across the state right now that giving standardized assessments is just not fair. When our schools finally open in the next month, my district needs to focus on the social-emotional needs of these students as they transition back. Who knows what they have been through over the last year? Who knows what their teachers have been through? And then we can focus on academics. We absolutely should not have to worry about putting these children through tests during this difficult time.

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276	1/30/2021	School staff	Yes	<p>I would like to add my voice to many other educator's to request that Regents and other state exams be cancelled this year. Having this testing requirement waived for this spring is the fair and equitable approach. As a teacher, I know I am still experimenting and struggling to find the best methods of teaching virtual students. After 22 years of teaching, I felt comfortable that I was reaching most if not all students, but with this new method of teaching, I am like a first year teacher. I know I am not reaching as many as I could but I am still finding those methods that would work best. I know many of my colleagues, new teachers and seasoned teachers, feel the same.</p> <p>From the students perspective, there is added stress just from the pandemic itself. Then the pandemic adds isolation for some and for others only limited social interaction, which adds tremendous stress to students. Many of these students have not faced this level of stress in their lives previously and they are still finding the things they need to do to handle the stresses they are currently dealing with. Students are still figuring out how to learn in this new environment. I know from my perspective, most students took 3-8 weeks to settle back into school. This year students are taking 15-18 weeks to adjust and start getting back into school routines. So students are still struggling to learn and there is not time to go back and teach the things that were taught earlier.</p> <p>It would be unfair to students to expect them to perform well on assessments this spring. Some students have the resources to meet their needs and others do not. The educational needs have changed dramatically and teachers are still working to figure out how to overcome the gap. Please do not add to students stress by having them take these high stakes tests.</p>
277	1/30/2021	Not specified	Yes	<p>Waive them permanently. Make assessments for ENL less intrusive and standardized. There's no reason to have secure standardized tests to assess language level. Use to be able to assess with a 44% on a test of reading comprehension.</p>
278	1/30/2021	Parent	Yes	<p>I wish to submit a comment in favor of waiving NYS Regents Exam requirements for academic 2020-2021. The extremely disruptive and uneven effects of coronavirus safety measures on NYS school districts this year would degrade the quality of the exam data. In addition, our students need those days for learning.</p>
279	1/31/2021	School staff	Yes	<p>Yesterday, I offered my feedback for the Assessment/ Accountability Waiver via the survey. This morning, I stumbled on a Tweet by author [REDACTED]. Had I seen this, I would have included this with my comments. He uses just a few words to explain what I believe, should be central focus questions we ask ourselves as we begin any endeavor for any rethinking and redesigning our schools.</p> <p>Please take a look and consider this a valid enough reason to rethink the messages we send to students, teachers and school systems through high stakes testing.</p>



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				<p>"Performance culture: -Will this be on the test? -Will I get a bonus? -Can I put this on my resume? Learning culture: -How does that work? -Will this teach me something new? -I wonder what would happen if..." --Adam Grant, Author</p> <p>(<a href="https://twitter.com/AdamMGrant/status/1355144932659523593?s=20">https://twitter.com/AdamMGrant/status/1355144932659523593?s=20</a>) This is my personal opinion.</p>
280	1/31/2021	School staff	Yes	<p>I am a 28 year veteran elementary music teacher and a parent of an 8th and 11th grader. I would like to express my support for the testing waivers in NYS.</p> <p>This year has been challenging on students, staff and parents alike. Students are struggling to go between virtual and in-person school with little extra support or normalcy. Students in grades 3-8 have barely had the chance to work on writing skills with the depth and breath that is normally taught in ELA. Math skills are also suffering with little time for vigor and the repetitiveness necessary to prepare for a state math exam. Teachers have been focused on curriculum sure, but more than that, they have been helping students with wellness and safety and a primary need.</p> <p>As far as students in 7-12, they have been bounced around in a hybrid model going between computers and in-person at a moments notice. My own children have been quarantined several times and made to even zoom in from school to meet the needs of all students. For this reason, I also believe that the NYS regents exams should be cancelled. These students should not have those test grades on a permanent transcript that will affect their lives many years to come in the future. Thank you for allowing me to give this public comment</p>
281	1/31/2021	Not specified	Yes	<p>I am writing to urge you to consider allowing both proposed waivers regarding NYS assessments and Improvement Ratings Level assignments this year. The pandemic has caused numerous hardships and unnecessary testing and improvement ratings should not be included in them.</p> <p>Educators and students need time to overcome any deficiencies or inequalities caused by remote, unequal, and/or interrupted instruction. Assessing students this year would be an egregious waste of time and resources. These monies would be better spent on filling gaps left by pandemic instruction.</p>
282	1/31/2021	School staff	Yes	<p>My name is [REDACTED] I am a Grade 6 Science and Social Studies Teacher employed by the [REDACTED] and I'm also a mother of a 7th grade student enrolled in the [REDACTED] New York. As a teacher and a mother of middle school aged children, I support the NY Board of Regents' request to the United States Department of Education, asking for a waiver for the 2020-2021 school year state assessments.</p>

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				<p>My son and my students are learning from home 3 days a week in our Hybrid Model (needed to meet the requirements of social distancing). Students at this age and developmental level have not acquired the necessary level of Executive Functioning skills a student needs in order to learn at home without adult assistance in the home. The ability to log on to a class at a specific time, and follow all written directions and verbal directions without any assistance from anyone at home has not yet been developed in this age group. Even though students have digital tools that will read the words on the screen to them, and record their words into text for them, students would need the Executive Functioning skills to remember to use these tools.</p> <p>The adults in each household are trying. Some adults are working during the school day, some adults at home during the day work at night and sleep during the school day. Some adults at home during the day are not able to assist their child in learning because they are not familiar with the educational technology being used. The amount of steps required for a student to complete a digital assignment can be overwhelming and different for each assignment. How are adults and care givers suppose to become educational technology gurus? Their child as to remember how to log in to their device, how to find the icon in order to launch a digital classroom like Google Classroom. Students and adults then need to navigate the software to find the most current assignment and then the assignment could involve any combination of educational technologies! Students might be asked to work a Google Slide, Doc, Edpuzzle, Quizlet, Quizziz, Gimkit, Google Form, Google Spreadsheet, Saavas digital math software, WeVideo, Vocaroo, FlipGrid.....etc, etc, etc! The possibilities of learning tools a teacher could be using are endless. For parents that have more than one child in different grade levels and maybe even different school buildings with different bell schedules and several different teachers for each child, this soon becomes a logistical nightmare. I've seen many parents throw their hands up in surrender. I've seen many students shut down. I've seen students with anxiety and depression have their mental illnesses consume them and their participation in learning stops. Asking families to go through this is unavoidable. We need to stop the spread of the virus. But then to ask our nations school districts to then TEST students on what they are retaining throughout a PANDEMIC is tone deaf to the needs of the families and students in NYS and the entire USA. I don't even teach or live in a racially diverse area on NYS. All families are struggling. Regardless of economic stature, the education level of the parents, the level of educational technology offered by the school district or available at home, ALL NY FAMILIES are struggling in this pandemic.</p> <p>I was relieved when I read the words of NY Board of Regents Chancellor Lester W. Young, Jr. say "In light of the ongoing pandemic, we have determined that the Spring 2021 state assessments cannot be safely, equitably and fairly administered to students in schools across the state and, therefore, are seeking these waivers." I agree wholeheartedly with his statement.</p>

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				<p>I am also in agreement with the 2nd waiver and follow up waivers to the NYS and US Dept of Education's ESSA requirements. "The Department's second waiver request seeks to eliminate the requirement to assign a Level 1 to 4 to each accountability subgroup for each indicator for which a school or district is accountable or identify schools for improvement in fall 2021 based on 2020-21 school year results. Separate from the waiver, NYSED will seek an amendment to New York's approved ESSA plan that would allow certain schools that are currently identified for improvement but made progress based on 2018-19 school year results to petition for removal from improvement status based on modified 2020-21 school year exit criteria. Upon approval of these waivers by USDE, NYSED will seek an additional waiver from certain ESSA reporting requirements pertaining to assessments and accountability."</p> <p>I DO NOT agree with this exception: "This waiver would also allow the Department to administer the New York State English as a Second Language Achievement Test (NYSELSAT) only to those English Language Learners who are able to attend school in person at least some days of the week." As stated above, attending school "some days of the week" is not equitable. You can not know what each students' home life is like. Furthermore, families that speak English as their 2nd language may be even more at a disadvantage in the Hybrid Model. Again, there may not be the adult understanding of how their child's education is being taught. Now add a possible language barrier! It's unfair to single out this demographic to test them, and not test everyone else. I also believe this may be the demographic hardest hit by sickness and death during this pandemic. Why then subject these children to the anxiety of either a high stakes test, and if it's not high stakes then it must be an unnecessary test?</p> <p>Thank you for allowing feedback! It is my belief that ALL demographics be excused from ALL standardized testing during pandemic learning</p>
283	1/31/2021	Not specified	Yes	<p>Aside from the testings needing an overhaul, the fact you all want to test during a pandemic shows the education system failed generations ago. This shouldn't even be up for debate, seeing as we have children dealing with so many different losses. Loss of normalcy, loss of family members/friends/loved ones, loss of social interactions, loss of peace and so many other things impacts their mental health.</p> <p>Though, we strive to have people work like machines, they are human. The idea that you need to poll the public shows there needs to be some testing and training on the psychological and emotional intelligence of the people who would like to administer testing.</p> <p>The idea that children would be able or should be able to perform, when we have adults not able to keep it together, is as moronic as having schools open and expecting no one to contract the virus.</p>

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				So in short and in layman's terms, don't force kids to perform at a normal level during non normal times.
284	1/31/2021	Parent	No	<p>I am a nyc public school parent. I am writing to request that we give the state test this year. We cannot go another year not knowing where our students are. It is irresponsible to not assess the basic proficiency in math and ELA. We know there is learning loss due to CoviD school closure and the subpar remote learning. We need to know where they are so we can support them with remedial education.</p> <p>We cannot and should not fly blind. We must be accountable to public school families. Give the state tests this year. No waiver.</p>
285	2/1/2021	Not specified	Yes	<p>In response to the Board of Regents' request for comments regarding proposed waivers for state testing in June, please accept the following comments.</p> <p>In light of the fact that currently the spread of COVID does not seem to be subsiding, it would seem that there will be no safe way for schools to comfortably administer NY State Regents exams in a responsible and socially distanced manner.</p> <p>According to the statement shared, "the Board's priority has been the physical and mental health, safety, and well-being of the children and adults in our schools." The pressures of state testing would be contradictory to that declaration for all parties, most especially the children. The students have been striving to maintain their academics, while constantly switching from hybrid to remote and back again; some with inadequate connectivity. The only constant in their lives right now is inconsistency. Additionally, families are struggling with loss of jobs, food insecurity and many juggling multiple students of different grades in one space. Families are exhausted emotionally, financially and socially. Standardized testing in the form of the NY State Regents exams will only add to the stress of the students, and by extension, teachers and parents, who are all suffering from COVID fatigue. Thank you for the opportunity to comment.</p>
286	2/1/2021	School staff	Yes	Every district is in a different situation in regards to modes of instruction. Each area of the state is in a different situation in regards to modes of instruction. A "one size fits all" test is not appropriate this school year as all students have not had equal access and opportunity.
287	2/1/2021	School staff	Yes	It is discouraging to think that standardized testing is anywhere on the state's radar this year, with the current state of affairs in our schools.

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				<p>We have had to PIVOT on so many instances, completely flip our teaching upside down, engaged learners on multiple platforms at the same time, and just rethink everyday and situation...that standardized testing isn't relevant now (okay, maybe we need to reevaluate them in general, but that is a conversation for another time).</p> <p>Our students are stressed about so many different things this year, we need to focus on their mental wellbeing and state of mind, more than preparing for a test (that will hold NO significance on how we teach this year)</p> <p>As an educator, I do NOT support us rolling out NYS assessments this year, and think we need to do what is right for the children.</p>
288	2/1/2021	School staff	Yes	I absolutely believe that state tests should NOT be given. This year has been anything but regular, and making these kids take Regents exams will not benefit them in any way. They are having a very difficult time with remote learning. We work hard everyday to serve the best interests of our students. Please do not put all of this extra pressure and anxiety on our already stressed out students.
289	2/1/2021	Not specified	Yes	<p>It is completely unconscionable to expect schools, and most importantly students, to administer/take these assessments in the Spring of 2021. The level of anxiety regarding COVID is more than palpable in our state and the need to administer all tests 'in person' places an immense burden on school districts requiring the extended loss of instructional time at a time when students and teachers are already working hard to minimize learning loss.</p> <p>In a 'normal' year, the district has experienced an average opt out rate of 25%. These opt outs are counted against the district, even though the district cannot mandate that parents send their students to sit for the tests. This year, we would anticipate 50% opt outs...what does this do to our participation rate and, therefore, our rating under ESSA's new rules...an opt out is a '0'....not a 'not counted'...this is ridiculous in a good year, but now???? NOT ACCEPTABLE.</p> <p>The only logical solution for teachers and students is to bypass the assessments this year and allow schools, teachers and students to 'catch up' on the massive instructional time lost over the past year. Please feel free to reach out for any further comments...</p>
290	2/1/2021	School staff	Yes	I am writing to express my strong opinion that there should be no state tests for students this year. As both a parent and an educator, I find it outrageous that we could even consider assessing students during a year like this. Children and teachers are suffering terribly as a result of this pandemic, and it is no time to assess achievement. It poses undue stress on both children and educators alike, and the results of such testing would be inaccurate at best.

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291	2/1/2021	School staff	Yes	<p>I appreciate you being open to receiving feedback on ESSA as we are in unprecedented times. As a building Principal, just trying to keep the physical building open, safe, and appropriate is a daily struggle. I cannot express the impact that these 3-8 assessments would have on the students, families, and teachers. We have, and continue to ask, so much of our students, families, and teachers, and the mental health of us all, along with the additional instructional time loss will be insurmountable.</p> <p>Thank you to Chancellor Young who perfectly summarizes my thoughts, "Throughout the pandemic the Board's priority has been the physical and mental health, safety, and well-being of the children and adults in our schools," said Board of Regents Chancellor Lester W. Young, Jr. "In light of the ongoing pandemic, we have determined that the Spring 2021 state assessments cannot be safely, equitably and fairly administered to students in schools across the state and, therefore, are seeking these waivers." Thank you in advance for your common sense and potential return to sanity.</p>
292	2/1/2021	School staff	Yes	<p>I just finished participating in a principals forum regarding state assessments. I understand the requests for the waivers are going to be submitted soon and appreciate the efforts of those who have worked on them. I think it is really important to consider the emotional impact state assessments have on children. Our students' lives are in such disarray right now and lack consistency given the obstacles faced each and every day. In my district we are currently implementing a hybrid model. Our students are in school 2 or 3 days a week when we do not have any covid cases that require the building to close and students to learn remotely.</p> <p>At this point we are working hard each and every day to provide students with a nurturing, supportive and fun environment to learn in. Attempting to administer state assessments will take more valuable instructional time away from our students. In addition there are still so many questions that need to be answered before we can administer the assessments with fidelity.</p> <ol style="list-style-type: none"> <li>1. Timing and scheduling of assessments</li> <li>2. Space in buildings</li> <li>3. Special Education testing accommodations</li> <li>4. Staffing testing locations within buildings</li> <li>5. Will there be multiple versions of the test so they can be administered to different cohorts?</li> <li>6. Science test- practical assessment- supplies and organization</li> </ol> <p>I understand that the state assessments are connected to federal funding, but it seems that the negatives of administering the assessments outweigh the positives. Thank you for your consideration and work related to this matter.</p>
293	2/1/2021	School staff	Yes	<p>I am in support of asking the Federal Government for a waiver for this year's 3-8 ELA and Math assessments. I am also in favor of receiving a waiver for this year's grade 4 and 8 science test.</p>

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				<p>Due to the circumstances that the Pandemic has created it is unreasonable to put the undue stress of state testing on the teachers and students of NYS. Our teachers are doing a wonderful job of addressing the many SEL issues that have increased this past year and are doing the best they can to provide quality instruction to our students. That being said, They have not been able to fully provide all the necessary instruction that would adequately reflect our student populations true abilities.</p> <p>Based on the current hybrid model we are using (AM/PM split days) we neither have enough time to offer this “timeless” test or enough space and staff to administer the test. In addition to a large number of remote students we also have a large number of remote staff.</p> <p>And finally, the test results would not be useful in helping us to determine areas of strength and weaknesses and how we create professional development for our staff and how we would provide additional instructional support for our students. We will use local measures to help address these issues.</p> <p>In closing, please know that I am an advocate of using standardized assessments to determine student growth. Once we return to “normal” I would support reinstating State testing.</p>
294	2/1/2021	School staff	Yes	<p>I would like to offer some feedback regarding the NYS spring 3-8 and Regents testing programs for the 2020-2021 school year.</p> <p>I am currently a special education principal.</p> <p>Based upon data that we're collecting from our students in terms of attendance, grades, benchmarking assessments, and standardized assessments, even our most successful students are lagging behind this year. It is my opinion that as our local schools and programs have transitioned between in person and remote learning models, students have suffered. As hard as our providers work to provide consistent, effective instruction and programming, it has been challenging for many reasons.</p> <p>If the spring testing were to occur, based on our data, it would not accurately reflect a student's knowledge of content or curriculum. I would propose that state testing be waived again this spring and resume as soon as school can return to fully in person models.</p> <p>Thank you for consideration of my thoughts.</p>

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295	2/1/2021	District personnel	Yes	We respectfully request that the federal government issue an ESSA-waiver for the standardized testing requirement so that our staff members are able to focus on instruction and remediation rather than preparing our students for a test that will in no way possibly measure "standardized" learning during this unprecedented time in our nation's history.
296	2/1/2021	School staff	Yes	Our school is in full support of both waivers. We have read them and understand the implications of both. Most of our students have completed their course work remotely this year. It has made it difficult to complete the labs need for the science regents and has made our CTE exams difficult to administer. I would be delighted to offer more in-depth feedback if needed, but as written the request for waivers have my whole support.
297	2/1/2021	Parent	Yes	<p>I am emailing to comment on the upcoming 3-8 testing in Math and English in NYS. I am 100% against this testing. As a parent of a 2nd grader and a 4th grader, the past 12 months has been incredibly challenging for my children. The uncertainties have absolutely taken a toll on them, as their normal educational pathway as been flipped upside down.</p> <p>Making children take these tests this year would just put another burden on our already stressed-out youth. We do not need to put one more thing on our kids in this very difficult time. I would request that 3-8 testing be canceled this year.</p>
298	2/1/2021	School staff	Yes	I would like to share my concerns regarding the NyS assessments this year. I am in full support of a waiver to forgo both the state resents testing as well as the grades 3-8 assessments. Due to the unprecedented situation of the global pandemic, it is unfair to students and teachers to assess This year. The standards will Need to reviewed and revised to adjust for the shift in education within the last year. Please consider providing a full waiver for all state testing for the remainder of the school year.
299	2/1/2021	School staff	Yes	<p>I feel very strongly that the state assessments for this year should be waived for the following reasons:</p> <p>Due to the interruption of the school year last year, many students were behind when they started this school year. So a lot of time this year was spent just catching them up to where they needed to be. And learning to teach online was a process. It is February, and as a teacher, I am just NOW feeling like I am finally providing the same level of education to my online students that I do for the ones who attend in person. In addition, due to periodic covid quarantines of staff and students this year, the material is taking longer to teach. So it is not fair to ask students to take the same assessments that they would be expected to take under normal circumstances. Especially when the reasons they are not as prepared are not under their control - lost time last year, teachers learning to teach in a completely new way, and periodic mandatory quarantines.</p>



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300	2/1/2021	School staff	Yes	<p>NYSED should provide waivers for Spring 2021 state assessments, especially the Regents Exams for high school students. Online learning has been extremely inequitable, with many NYC students STILL not having access with reliable internet and a working device. Students who have IEPs or are English Language Learners do not have access to the services they need.</p> <p>There is inequity in communities that are struggling financially, facing unemployment and eviction due to the pandemic. Students could be houseless. Having them measured against their wealthy, housing secure peers is unjust and upholds educational racism in our state. COVID-19 has hit [REDACTED] very hard, and having students take an exam that will determine their graduation status while being faced with unprecedented stress and uncertainty, death of family members and school staff, all while learning almost completely remotely without mental health services is unjust as well. Students are already facing high levels of anxiety; causing them to sit for state exams in a school building after learning at home all year would lead them into even higher levels of anxiety</p> <p>Trust should be placed upon the schools to measure student success and make up for any learning gaps next year. Our students are doing the best they can with the resources they have been given, and since these resources are not fairly distributed, we cannot hold students to the same standards as a wealthy student who has access to a quiet room, reliable internet, tutoring, and a parent who is able to work from home.</p>
301	2/1/2021	School Staff	Yes	<p>Please don't administer the state or Regent exams this year. It is important to honor families rights to protect their family from exposure.</p>
302	2/1/2021	Student	Yes	<p>This pandemic has caused chaos throughout the world, and now COVID has affected my area where I live. There's been deaths from people in my area as well, my classmates have also lost people from covid. To top that off we have our education to worry about, and regents at the end of the year. This school year hasn't been the best at all from my perspective and from what I see. I don't feel like I am learning anything due to being at home doing school from a computer. All my teachers in math and chemistry say we are behind and their other classes are as well. With that the capacity to do a regents is incapable. I believe the regents should be cancelled due to the amount of stress this pandemic is holding on students heads and school at the same time. Us students spend our time inside on a computer watching our teacher. At home all the students don't have the motivation to learn and the learning we are doing is not much. This year has been a real tragic stress ball, regents should be excused for this year for the following grades 9-12. It doesn't feel fair that we have to put up with all this happening in the world and to have regents at the end. We really need a break, and this is from a students perspective i can't handle more stress. I feel slowly caving in due to all my alone time doing homework and school. I get that it's something for colleges to look at but to put all this on us during a pandemic to sit there 3 hours like we've done</p>

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				and not know the information there. Also there will be an increase in fails, putting the regents on for this June will not help anyone. We will just suffer even more and then suffer from more stress if we fail. Studying is a option yes but do you really just want to put more work on us than our teachers already have? I have headaches every day because of the work I get daily and I don't seem to get a break. On weekends I have to do about 7 assignments for each subject because how far we are behind and I can't handle it anymore. I just want the year to be over in peace and not have 4 regents to do at the last days of school. It wouldn't be fair to all of us especially people who are mourning for their relatives deaths. Please consider not having the regents in June and relief will spread through schools. It would make the year better not having to worry about them.
303	2/1/2021	Parent	Yes	<p>I would like to express my support for waiving state testing requirements particularly at the high school level. I am the parent of a current junior at [REDACTED] I feel strongly that the Regents exams cannot be equitably and fairly administered to these students this year for the following reasons.</p> <ol style="list-style-type: none"> <li>1. With hybrid learning, the students have learned much more slowly and will not be able to cover all the material.</li> <li>2. Some Regents exams (such as language exams) are cumulative over years and the second part of last year was also not productive for learning as most classes just reviewed old material. Therefore, these students have missed way too much of part of last year and then while learning online this year. It is not fair to expect them to be able to take a cumulative exam that assumes multiple years of teaching.</li> <li>3. It is quite clear that online/hybrid learning requires technology and not all teachers within a school or between schools have the same access to the most effective technology.</li> </ol> <p>In addition, teacher training, to my knowledge, does not encompass online teaching/learning and there are clear differences in the teaching ability between teachers.</p>
304	2/1/2021	Parent	Yes	I think standardized tests need to be waived for this academic year. Any and all school time should be used for learning not high stakes testing due to how much time was lost over the last year.
305	2/1/2021	Not specified	No	I would like to keep state tests this year.
306	2/1/2021	Parent	No	<p>I am a NYC public school parent. I am writing to request that we give the state test this year. We cannot go another year not knowing where our students are. It is irresponsible to not assess the basic proficiency in math and ELA. We know there is learning loss due to COIVD school closures and the subpar remote learning. We need to know where students are so we can support them with remedial education. We must be accountable to public school families.</p> <p>Give the state tests this year- keep children motivated to work hard!</p>

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307	2/1/2021	Parent	No	<p>I am a mother of 2 public school students. I am writing this email to you to urge you to administer state examination to NY students this year.</p> <p>The goal of state tests tests is to assess how students are doing in relation to grade standards. Without these tests, we have no way of knowing how far our students are falling behind due to pandemic school closures, and abysmal remote learning that they have been receiving.</p> <p>The [REDACTED] is trying to erase evidence of their failure in teaching our students by requesting that the state tests not be held. Their claim that they are requesting a cancellation due to their concern over students' well being is disingenuous. If they were truly concerned about our students, they would want to assess how the students are doing and ensure that they are helped in the areas they are falling behind.</p>
308	2/1/2021	Not specified	No	Please administer state tests this year.
309	2/1/2021	Parent	No	I demand keeping state tests this year to see where kids stand not only in comparison to other states but also in comparison with other countries.
310	2/1/2021	Parent	No	I am writing to request that we give the state test this year.
311	2/1/2021	Not specified	No	Please give all standard tests this year.
312	2/1/2021	Parent	No	<p>I would like NYS to hold the NYS STATE test in 2021.</p> <p>I am a concerned parent of two. My children needs to stay academically challenged compared to school age children from other States.</p>
313	2/1/2021	Parent	No	I am a concerned parent of one child in a [REDACTED] Tests and accountability for the system we pay and are served by must be maintained to fully understand the results of the teaching regardless of the pandemic. ALL NYS tests should be maintained this year.
314	2/1/2021	Parent	No	<p>I am a [REDACTED] public school parent. I am writing to request that we give the state test this year including the Regents. We cannot go another year not knowing where our students are. It is irresponsible to not assess the basic proficiency in math and ELA. We know there is learning loss due to COIVD school closures and the subpar remote learning. We need to know where students are so we can support them with remedial eduction.</p> <p>We cannot and should not fly blind. We must be accountable to public school families. Give the state tests this year for all those who want to take it. You managed to administer SHSAT tests safely.</p>

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315	2/1/2021	Parent	No	<p>I am a [REDACTED] public school parent. I am writing to request that we give the state test this year. We cannot go another year not knowing where our students are. It is irresponsible to not assess the basic proficiency in math and ELA. We know there is learning loss due to COVID school closures and the subpar remote learning. We need to know where students are so we can support them with remedial education.</p> <p>We cannot and should not fly blind. We must be accountable to public school families. Give the state tests this year. No waiver.</p>
316	2/1/2021	Parent	No	<p>I am a [REDACTED] public school parent. I am writing to request that we give the state test this year. We cannot go another year not knowing where our students are. It is irresponsible to not assess the basic proficiency in math and ELA. We know there is learning loss due to COVID school closures and the subpar remote learning. We need to know where students are so we can support them with remedial education.</p> <p>We cannot and should not fly blind. We must be accountable to public school families. Give the state tests this year. No waiver.</p>
317	2/2/2021	Parent	Yes	<p>When considering spring assessments for students. Please think about the following.</p> <p>Schools have historically supported high academic standards and improving the quality of instruction. We recognize that in normal circumstances testing has a place in helping educators assess student progress. This year's circumstances are far from normal.</p> <ul style="list-style-type: none"> <li>● We believe that any time spent this school year preparing and administering tests could be better used to help students catch up on learning they may have lost during the pandemic, as well as focusing on student health and wellness.</li> <li>● Our 7-12 grade students remain in a hybrid model and we believe tests could not be administered fairly in that learning environment. Furthermore, quarantines have been normal as Covid-19 cases pop up at our schools and would further complicate the fair administration of tests.</li> <li>● If tests are used for district accountability this year, the results will be distorted by disparities in learning modalities, family support and internet availability and will not provide accurate data.</li> <li>● Districts should have the ability to make their own plans for how best to access where students need extra support.</li> <li>● Lower income students, English Language Learners and special needs students have been unequally impacted by the Covid 19 pandemic and would be at a further disadvantage if testing were administered.</li> </ul>

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				Please consider cancelling the exams this year
318	2/2/2021	Parent	Yes	I am writing to you as a parent of 2 current high school students. It would be completely unfair for these students to take a regent this year. They have not been taught properly due to virtual and hybrid learning models. This will be setting them up for failure.
319	2/2/2021	Parent	Yes	As a public school educator and parent of 3rd and 4th grade students I encourage the education department to exercise caution when assessing students at this time. Using data to guide how we address the needs of our is students is almost always in the best interest of our institution. Under the current circumstances testing could inflict harm on our students and school community. Furthermore the data collected from testing this year would likely provide inadequate data to help guide our decisions.
320	2/2/2021	Teacher	Yes	I would have to agree as a parent and teacher that this year does not resemble that of a normal year. I vote to cancel state assessments which include Regents exams.
321	2/2/2021	Teacher	Yes	There should NOT be testing this year. The students have had a very tough year. Some students have not been in school since last March. Let them learn without the added stress of tests!
322	2/2/2021	Teacher	Yes	<p>I am writing in response to the need for additional flexibility related to certain provisions of the federal Every Student Succeeds Act (ESSA) pertaining to administration of NYSESLAT State assessments in spring 2021.</p> <p>As a teacher of English to speakers of other languages, I strongly believe that English Language Learners should not need to take the NYSESLAT test this school year. It would not be a fair or equitable assessment to only give it to the children who have been enrolled in hybrid programs, but not to the virtual learners. If it cannot be safely, fairly, and equitably given to all ELLs, then it should not be given at all in the spring of 2021.</p> <p>In order to administer the NYSESLAT tests, students would need to complete the speaking modality test with a mask on, thus impeding the teacher's ability to truly hear and understand their answers. They also need to complete this portion of the test in the presence of an additional 3rd party adult, the dis-interested teacher, who scores the test. This requires both the students and teachers to therefore be in the presence of additional people from other school buildings, increasing their possible exposure to the virus. In addition, teachers also need to wear a mask while administering the test. This could cause difficulty for students to clearly hear and understand the directions and reading passages being read aloud.</p>

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				<p>Many ELLs who are in hybrid programs are only currently attending school two days a week. If we need to administer the NYSESLAT, it will take away precious instructional time, as well as take additional weeks of time away from instruction, in order to complete all of the modalities.</p> <p>Districts should be able to provide the state with a list of parameters they will follow in order to determine the amount of ENL minutes the ELLs will receive during the 2021-22 school year, in lieu of the NYSESLAT.</p> <p>For example:</p> <ol style="list-style-type: none"> <li>1. ENL teachers should be allowed to determine if their transitioning or expanding students would require additional support, up to 72 minutes, more than their NYSESLAT test results from 2019 or NYSITELL score from 2019 or 2020 requires, for students who have not made adequate progress during the 2020-21 school year. (Standardized assessments, running records, directed reading assessments, writing samples, etc, could be used by districts across the state to make this determination in lieu of the NYSESLAT.)</li> </ol> <p>ENL teachers should be allowed to determine if their entering or emerging students would require less ENL support than their NYSESLAT test score level from 2019 or NYSITELL score from 2019 or 2020 requires, at a maximum of replacing stand-alone time. ELLs who are proficient in reading and writing, by meeting their grade-level standards set by their district, could be clustered to continue to receive co-taught time, but would not need stand-alone instruction.</p>
323	2/2/2021	Principal	Yes	<p>Thank you for the opportunity to share my thoughts on both our Accountability Status and the upcoming NYS assessments.</p> <p>I am a 19 year veteran Elementary Principal [REDACTED]. Our school has found itself on 'the list' for numerous years. Granted, our students need to improve their academic standing. We strive daily to implement systems, improve our own practices, and build relationships with families to help everyone involved see the importance of improved academic success. We had been making great strides, and then the Pandemic surfaced.</p> <p>We continue to instruct, challenge, and develop new teaching and motivational strategies and approaches to best meet the needs of our students. We work closely with our teams - Shared Leadership, Student Support, Attendance, PBIS, and our colleagues at the NYSED office to review plans monthly and strategize how to counter the hurdles in our way to success for all children. We are supporting the mental health needs of families, students, and our staff who ironically, are also "families and parents with students struggling through the Pandemic".</p>

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				<p>We use assessments and rankings as tools to assess and score in order to chart our next steps. Under these conditions, our data would not be an accurate reflection of the hurdles overcome, the challenges faced, or the effort demonstrated by our teachers and families. We face obstacles including COVID 19 and illness, lack of efficient internet, and we are depending on families, day care facilities and often teenage siblings to oversee our young students' educational progress. Those are the positive examples. Many students are left in a bedroom alone with no one to support them effectively or are trying to concentrate in a loud, distracting living room.</p> <p>Because children in all school districts are facing challenges, this would be the perfect time to start with a clean slate for everyone. Give schools time to adapt, adjust and plan for our future. This would be a tremendous boost also to the confidence level of our educational professionals and would show trust to allow us to do the job that is necessary for our students.</p> <p>I ask you to please consider removing our "Needs Improvement" title and allow us to adjust with the challenges we face during this Global Pandemic. I also ask that you cancel the NYS Assessments and provide our students a chance to grow and the gift of time before challenging them with a rigorous assessment they are not prepared to tackle.</p>
324	2/2/2021	Teacher	Yes	<p>Thank you for requesting a waiver for our state assessments. Students are struggling to learn using the hybrid and remote models because they are not used to them. In addition, there are several family and mental health stressors that students have experienced as a result of the pandemic. It would be in the students' favor to cancel the state assessment for this year as to not put additional stress on our students during a pandemic.</p>
325	2/2/2021	School staff	Yes	<p>I am writing as a Parent of 3 children grades 5th, 7th, and 10th, 2 of which have IEP's. I am also an employee at a Middle School in the health office. I understand the need for standardized testing but feel it is unfair to students who did not get a level playing field to learn this year. Every district had different plans. Some had access to remote learning tools earlier than others. Some had more closures due to Covid-19 and others had more days in person. Learning has been challenging this year. I watched my honors student child who prides herself in doing well have her GPA drop 8 points. I see them struggling to stay organized and learn new material. The staff is playing multiple roles with remote, hybrid students and are giving 100% to an impossible task. We are grateful for our teachers. It is impossible to have an accurate measure of content learned when the manner in which the students being tested is inconsistent to their peers due to the restrictions the virus caused. This will create a negative impact on self esteem and cause increased stress. I thank you for your time and consideration on this matter.</p>

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326	2/2/2021	School administrator	Yes	<p>I want to share my thoughts for consideration regarding the NYS assessments. I do not believe it is reasonable to administer these assessments this spring. Our learning environment and instructional model has changed significantly since last March and continues to change throughout this year (i.e. remote to hybrid, etc.).</p> <p>I believe it is unfair to ask our students to take an assessment considering the evolving models and tools they are navigating and it's not reasonable to expect our teachers to administer them.</p>
327	2/2/2021	District personnel	Yes	<p>As district test coordinator at a regional BOCES, I am responsible for preparations for and oversight of NYSAA administration to over 350 students eligible this year in our regional schools, as well as the coordination and provision of training of new and returning test administrators from across the region. I support the request for a waiver to suspend Spring 2021 state assessment.</p> <p>Although our schools' reopening plans have been for full-time in-person instruction this school year, students have received remote instruction either full-time, partial year, or intermittently, because:</p> <ul style="list-style-type: none"> <li>• Given the quarterly option of a remote accommodation for students,</li> <li>• some students have been receiving remote instruction full-time for the year at their family's request</li> <li>• some students' instructional status has been switched to and from remote status during the year at their family's request</li> <li>• some students have had changes in teacher assignments, as instructional status has changed</li> <li>• In view of positive cases and related quarantine requirements due to contact tracing as well as travelling, classrooms and in some cases schools have at times pivoted suddenly to remote instruction for periods that vary from a day to 2 weeks</li> </ul> <p>Even taking into account those changes in instructional status due to family choice, all students have experienced a school year marked by high levels of actual or anticipated unpredictability and disruption, day to day, week to week, month to month. Responses to the pandemic have varied from region to region, district to district, school to school. There are daily reports of school closings across our region and other regions across NYS for reasons like those stated. Issues of equity have never been so prominent.</p> <p>Like all computer-based testing, preparation for the NYSAA involves extensive annual training and retraining, identification and uploading of student data, rostering and completing individualized student profiles. Given variable access to technology resources across districts and ongoing disruption of the teaching experience, these preparations have been enormously challenging and stressful for educators who are dealing with constant and</p>



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				<p>unpredictable disruptions to their daily lesson delivery and planning. That is not to even begin to address how the pandemic would potentially affect the actual assessment experience during the testing window. Already a decision has been made by SED to not assess students remotely. In that case, what percentage of NYSAA eligible students would be exempted? And how would the exemption of so many students affect scoring? Another question, given the variable, unpredictable and disruptive nature of this year's academic experience, what would we be accurately measuring? Even an individual student's progress cannot be accurately compared to past performance when circumstances of learning and assessment are so different from prior learning and assessment experiences.</p> <p>These are a few of the many significant unique characteristics of this year's educational experience that support the position to forego the 2021 Spring state assessments. I leave it to my colleagues to identify others. Maintaining meaningful and sound assessment practices and basic human compassion require no other course. Thank you for submitting a request for a waiver.</p>
328	2/2/2021	Teacher	Yes	<p>I would like to give you some reasons why state testing would not be a fair practice during this year of inconsistencies and hardships.</p> <ul style="list-style-type: none"> <li>• The learning for students has been inconsistent with some being fully remote, while others have had the opportunity to join class live for half of the day. There have been several disruptions to consistent learning as students have been asked to quarantine or the school has been closed due to lack of staffing with COVID related issues. This has led to sudden online learning for all, which is not an optimal learning environment.</li> <li>• Students have missed various parts of instruction due to quarantines, the need to go for COVID tests and their teachers' quarantines.</li> <li>• Instruction had to be altered considerably due to social distancing and the need to eliminate use of communal items. As a result, the same level of instruction was not possible in math and ELA. Student-teacher interactions for conferencing and direct work were limited by the safety directives.</li> <li>• For young students, writing or undertaking math on a screen/computer is not a substitute for pencil and paper and use of manipulatives.</li> </ul> <p>Although teachers, students and families have worked together to make the most of this school year, there are too many variables making state-wide testing difficult, unfair and, quite frankly, cruel.</p>

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329	2/2/2021	District	Yes	<p>I am writing to express my concern over holding state exams this Spring, and to give my support of the letter already filed requesting the waiver for the rest of the 2020-2021 school year.</p> <p>As the letter states:</p> <p>"NYSED is requesting this waiver because we have determined the spring 2021 State assessments cannot be safely, equitably and fairly administered to all students across the State given how severely the pandemic has impacted the delivery of instruction to students and adversely affected their social and emotional well-being."</p> <p>Even though teachers are eligible for vaccines, myself and a number of my colleagues are still unable to get an appointment for vaccination.</p> <p>Students and their families are not able yet to be vaccinated in many cases.</p> <p>The academic year is never standard and always inequitable, but even more so this year. Our students and families are relying on delayed technology, inconsistent internet access, on top of death, illness, job loss, and housing loss. The state should not dare to test under these circumstances.</p>
330	2/2/2021	Teacher	Yes	<p>This year is unique in so many ways. As a teacher, I am so proud of my students, their parents, and my colleagues for how they have adapted and overcome so many challenges. Students and teachers are doing the best they can with the hybrid/remote model; however, it is a matter of equity when it comes to discussing New York State testing for the 2020-2021 school year.</p> <p>In my district, students are either in our hybrid model (3 days in, 3 days remote) or fully remote and livestreaming into our courses daily. Looking at this hybrid model, it simply isn't fair to expect all students to be at the same places when it comes to content knowledge and content immersion.</p> <p>To mandate state testing this year would be unfair and not equitable across the board. What would be the validity of the scores? What are we truly reflecting when every district in New York State has a different model and we cannot ensure that all students have been exposed to the same material? These test scores will only serve to unfairly punish struggling districts and struggling students.</p> <p>Until there is a standard instructional model once again across the state, state testing should be suspended. I hope that you and the Board of Regents will make the decision that is truly right for students and teachers across the state. Thank you for your time.</p>

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331	2/2/2021	Primary Stakeholder Group	Yes	<p>(Attached Letter)</p> <p>Thank you for the opportunity to comment on the New York State Education Department’s application for waivers of assessment and accountability requirements of the 2020-21 school year, as specified in the submission to the USDOE.</p> <p>The distr expresses our strong support for the waivers on behalf of approximately 8,000 building administrators and program leaders across the state. At the start of the second half of this school year, we began receiving increased communications from our members expressing concerns regarding the state assessment program and other accountability requirements. For some members, particularly those who participated in the computer-based assessment field test, the concerns grew stronger. Our members were increasingly questioning the appropriateness of going forward with the state assessment program this year.</p> <p>Concerns were based on instructional programming and the safety/health of their school community. Due to the COVID-19 pandemic, schools across the state have been met with challenges at every turn and as a result instructional programs have been uneven and inconsistent. The routine and flow of the instructional pacing has been interrupted by new health protocols, moving between different models of instruction, staff substitutions, length of transportation, quality of remote learning and overall disruptions in each day. Teachers and administrators have provided as much consistency and high quality of instruction as possible, but it would be difficult to compare the 2020-21 school year to any other. Further, our administrators became increasingly concerned for the health of their school community. They feel that bringing students and staff back into the schools to administer the assessments would unnecessarily increase exposure to the virus and that would not be prudent in light of the rollout of vaccinations and appearance of variant strains. Further, the requirement for in-school presence to take the exams would disrupt carefully established social distancing and likely increase the opt out rate of the exams. For all of the above reasons, [REDACTED] agrees with the SED position that it is in the best interest of the students and school community to request suspension of the state assessments used for accountability purposes for this school year.</p> <p>[REDACTED] also supports the submission of the second waiver application regarding requirements for identifying accountability subgroups by assigning levels, based on the assessments. Our members have expressed concern regarding possible identification as a school needing “targeted or comprehensive” support and the submission of the second waiver moves in a direction that more fairly accounts for the many extenuating circumstances facing schools this school year.</p>

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332	2/2/2021	Teacher	Yes	<p>My son is a Junior at [REDACTED] on [REDACTED] and I am a teacher in [REDACTED]. I plead with you to give the schools a waiver for the state tests and exams as this has been a year like no other. My son is working so hard to follow the content and do his work, but it is a tremendous amount of stress and strain on him to take it all in. I think taking the state exams would add an unnecessary stress and I don't think the benefit of giving them outweighs this.</p> <p>As a teacher in [REDACTED] I see this same strain on teachers and students and strongly request that the schools can get a waiver for the exams.</p>
333	2/2/2021	Teacher	Yes	<p>There should be no state assessments this year. Children are learning during a pandemic and do not need the additional stress of state assessments.</p>
334	2/2/2021	Primary Stakeholder Group	Yes	<p>(Attached Letter)</p> <p>This letter serves as [REDACTED] official public comment on the proposed requests for waivers from the ESSA testing and accountability requirements. [REDACTED] strongly supports the requested waivers. Students and teachers have been through a difficult year as the pandemic rages on in New York. The testing waiver will relieve the pressure students feel over these tests, while the accountability waiver will ensure that schools are not mislabeled.</p> <p>Throughout this school year there has not been a standardized mode of instruction across the state. Schools have varying degrees of in-person, hybrid, and remote instruction. Without standardized instructional modes, there should not be a standardized test at the end of the year. In this climate it is impossible to maintain any standardization for test administration even within a school district. Equity is paramount and this year, under these conditions, equity cannot be ensured.</p> <p>The ESSA accountability measures were not designed for the difficult circumstances districts are facing during the pandemic. The accountability system should be put on hold for another year except for schools that could be removed from the list based on previous data.</p> <p>For these reasons and more we support the two proposed waiver requests.</p>
335	2/2/2021	Not specified	Yes	<p>NYSED should consider an exemption for any/all regents exams that determine advanced designation for students who took algebra and geometry at any time during this pandemic. It is not fair or equitable to test students on algebra 2 when there were so many disparities in the students preparation for algebra and geometry. I think regents that determine advanced designation (especially math which relies heavily on students previous math courses) should be exempt at least until next gen standards are in place. That will give time to</p>

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				level the playing field for students impacted by this pandemic. Unprecedented times require unprecedented measures.
336	2/2/2021	Not specified	Yes	<p>I am emailing to urge you to cancel the regents for the 2021 year. During the pandemic, it has been hard to have the same quality of education as we did when we were learning in person.</p> <p>Many teenagers are stressed and as a junior, my classmates and I are struggling to prepare for the SAT, AP, regent, and class tests. There are so many things to prepare for that I feel as if keeping the regents might be the thing that tips the scale. Last year when the regents were canceled, I was able to focus solely on my AP tests which help tremendously, and I got a score I never thought I would have achieved.</p> <p>The teachers compensated for the loss of the regents by making a final test in form of a project which my friends and I agreed was a perfect way to sum up everything we had learned that year. Even though it has only been 2 months into 2021 there have also been additional factors that have made this year troubling. Adding on the continuous isolation there has also been a lot of losses in all of our families, which is hard to get over.</p>
337	2/2/2021	Parent	Yes	<p>This year has been tough, especially on our kids. School is not the same. I have one child in elementary school and one in middle school. Both kids teachers spent a long time doing review this year. My middle schooler said his math teacher recently indicated that they have covered half of the material they would normally cover. I am not sure how we can give them an exam or test, which hasn't changed, when what and how they are taught has changed. While it might indicate where some holes are, it isn't exactly fair to have that be placed on individual kids.</p> <p>Regents exams will be on their permanent record. I feel a missing grade would appear as a better reminder of it being a Pandemic rather than a lower grade. Different districts have different teaching models in place, it wouldn't be fair to put them all in the same boat when they really aren't in the same situation. It would also be difficult to administer a test to remote kids. I feel the state assessments and accountability requirements for this year should be waived.</p>
338	2/2/2021	Other	No	<p>I don't think you should get a waiver for the tests this spring.</p> <p>There would be some VERY important information gained by giving it.</p> <ol style="list-style-type: none"> <li>1. How many were able to take it?</li> <li>2. How was the performance on it?</li> <li>3. How much have the students lost in the last year?</li> <li>4. What teachers had the best results and what can we learn from them?</li> </ol>

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				<p>these pieces of information will help going forward.....</p> <ol style="list-style-type: none"> <li>1. What is missing (home computers, lack of face to face instruction, etc?)</li> <li>2. How do we make it better?</li> </ol> <p>Please use it as an informational tool</p>
339	2/2/2021	School staff	No	<p>Thank you for accepting comments pertaining to the administration of State Assessments this Spring. Here are my comments pertaining to the NYSESLAT exam:</p> <p>-I think it is crucial that ELLs receive the NYSESLAT exam this Spring. Since the speaking portion is administered one-on-one and the Listening/Reading/Writing booklets could be administered in small groups (following social distance guidelines), I think it could be totally do-able. It will be extremely beneficial for ELLs next school year to have updated proficiency levels.</p> <p>-One of my concerns is the two week administration window for the Listening/Reading/Writing booklet administration. In order to follow COVID social distance guidelines (6 feet apart, can't combine students from other classrooms, sanitizing), we may have to have smaller groupings, which could possibly pose a timing issue. It would be extremely helpful if we were offered a three week window to administer these booklets, in order to account for the extra time needed. During a typical year, we normally use almost the whole 10-day time period (Our school has 115 ELLs, only 4 teachers, limited locations to test, make-up days for absences, etc.)</p> <p>-Similar to the NYSITELL, it would be helpful if an all-remote family could apply and fill out a waiver if they don't feel comfortable bringing their child in to test. However, for an all-remote family that would like their child to take the NYSESLAT, it would be helpful if they were given the option for their child to come into the building by appointment only to test (one-on-one), similarly to the Hybrid families.</p> <p>I appreciate you listening to our comments from "in the field".</p>
340	2/2/2021	Parent	No	<p>Please give the state tests this year: covid has caused a lot of learning problems (hitting the poor especially hard: ie see the research in this LA Times article).</p> <p>The ONLY way we know where we are is by having an objective assessment of the current state of our students. GIVE THE STATE TESTS this year!</p>

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341	2/2/2021	Parent	No	<p>I'm a parent in the [REDACTED] I'd like EVERY standardized test to be ADMINISTERED this spring. Yes, the pandemic has caused challenges and there is concern that kids have been shortchanged in their education this year. Without a standardized test, how do we know if this is the case?</p> <p>I'm sure the average score is lower this year. But it is important to have some metric so that we have some accountability. I grew up in [REDACTED] and remember when kids were "socially promoted." It is unfair to our kids to take the easy way out - it's a pandemic, things are too hard, let's just pass them without testing to see if they know anything. Without a standardized test to keep the [REDACTED] in check, I do not trust this administration to actually make sure our kids are reading at grade level, know any math, etc.</p> <p>The private schools, the charter schools and the Catholic schools can all manage it - why can't the public schools given all the millions that taxpayers have poured into the system? Didn't [REDACTED] hire layers and layers of \$200K educrats? Well, what are they all doing?</p>
342	2/3/2021	Parent	Yes	I support both waivers!
343	2/3/2021	Parent	Yes	As a parent of a K-12 student, I support both waivers for Spring 2020-21 school year (re ESSA accountability requirements). Giving standardized tests in order to judge schools based on test scores is unfair under normal circumstances and especially wrong during the pandemic.
344	2/3/2021	Parent	Yes	<p>As a parent of two children, I support both waivers; especially in consideration of the pandemic in which children did not receive the full benefit of education as a result of hybrid learning. In addition, I feel that giving the tests would place immense stress on our children who are already experiencing mental distress that is NOT being addressed at all.</p> <p>The fact that we as parents have to even reach out to you is especially preposterous when a pandemic is raging.</p>
345	2/3/2021	Teacher	Yes	<p>I have been teaching English as a Second Language from elementary to college level for the past 29 years in inner city high poverty districts. As we all know this past year has been like no other. Most of my elementary students have been virtual this year, as have I myself.</p> <p>We have figured out the technology to some extent, I have worked hard at establishing routines and procedures to ensure some sort of progress for my students.</p> <p>By no means can a virtual year be compared to in person contact. Especially young children learn so much better from their peers, especially second language learners do so much better with the many alternative ways (such as</p>

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				<p>hands on projects) of exposure to our language. Most of virtual instruction falls rather short of those ideas and experiences.</p> <p>Add to that the inequitable access to technology, not just from one district to another, but also among families/students within the same district, and from school to school, and it becomes abundantly clear that giving high stakes tests is the last thing anyone needs. Most teachers can informally assess their students' progress in order to inform instruction that is productive.</p> <p>Then there are the logistics of giving the actual tests in person in districts where the virus runs rampant, where entire buildings are shuttered, not to mention the increased risk for teachers to come in contact with potential carriers.</p> <p>I could go on, but most points are already obvious. Lets all consider this past year a year outside of time for most of us. A year where kids who attended school made progress as best they could and which does not need to be measured by a standardized, tortuously long test.</p> <p>Please let the policy makers for once show some kindness and treat our students and teachers like real people, not abstract figures.</p>
346	2/3/2021	Teacher	Yes	<p>I am writing to express my concern regarding the proposed waiver for state testing and how it is not equitable to English Language Learners.</p> <p>I have been an elementary public school teacher for over 28 years. I have taught in three different states as a classroom teacher as well as an ENL teacher. I have been teaching elementary ENL in the Capital Region for the past 16 years. I have worked on state assessment review teams as well as a [REDACTED] ENL reviewer for the NYSESLAT.</p> <p>I understand the importance of gathering data that helps inform our teaching practices and how the NYSESLAT gives valuable information regarding ELLs language levels.</p> <p>It is unfortunate that we were not able to administer the NYSESLAT in the spring of 2020 due to COVID-19. However, because we were teaching remotely, it was an educationally sound choice.</p> <p>I read the draft of the proposed waiver. The following section causes grave concern:</p> <p>"C. Describe how the waiving of such requirements will advance student academic achievement.</p>



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				<p>Waiving the requirement to administer assessments will allow schools the necessary flexibility to attend to students' social-emotional health and focus on teaching and learning and community needs during a time when instructional modalities have varied widely, both across the State and within schools. In addition, allowing the time ordinarily needed for administering assessments to be used for instruction will ensure that students are receiving the maximum amount of learning possible and help to minimize gaps in learning that have resulted from the disruptions caused by the ongoing COVID-19 pandemic. Ultimately, not administering the tests will reduce student anxiety and will create opportunities for schools to utilize more innovative, meaningful, and holistic assessments to measure student growth and mastery of State learning standards."</p> <p>I agree with this statement. Each and every student in NYS, their parents, and teachers have had an inconsistent and stressful year--beginning in March 2020. Every teacher of my acquaintance is working toward creating those "innovative, meaningful and holistic assessments" that meet the needs of individual students. Frankly, that is something we do each and every day, regardless of whether or not we are teaching during a pandemic because state assessments do not give us information on the whole child.</p> <p>The waiver goes on to state, "For English Language Learners (ELLs), NYSED plans to make its spring 2021 English Language Proficiency (ELP) assessment available for administration to those students who are able to test in-person (while not requiring it for those who cannot safely and fairly participate). This will offer students the opportunity to exit ELL status if appropriate and ensure that the appropriate levels of English as a new language services continue to be provided to students in the upcoming school year. NYSED will work with LEAs to maximize the number of ELL students who can participate in this assessment by exploring test administration policy changes and expansion of the test administration period. Removal of the federal requirements for ELP testing would allow NYSED to offer the most flexibility to LEAs to ensure that students can test to best inform educational programming decisions."</p> <p>As a teacher of ELLs, it is a daily task to assess my students in a manner that is equitable, fair, and meaningful. Especially as the majority of math and reading diagnostics that are used are not normed for ELLs. The consequence is that state data do not give teachers an accurate picture of the whole child.</p> <p>It was with dismay that I re-read the waiver and realized it is not equitable for English Language Learners. To make the test available for some ELLs and not all is discriminatory as well as educationally unsound.</p>

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				<p>The NYSED waiver letters expressly state, "Given the potential negative consequences of school closures on educational performance, the vast inequalities in exposure to distance learning portend rising disparities in learning outcomes."</p> <p>Given this statement, how is it equitable or educationally sound to ask some ELLs to take the test and not all? NYSED is stating that those families that are able to be in-person have the ability to take the test, but those who, mostly out of necessity, choose remote learning do not have to take the NYSESLAT. This will create an even larger divide in our educational system than already exists.</p> <p>Please take this into consideration and include the NYSESLAT, alongside the other state tests, as a test that will be waived in the spring of 2021.</p>
347	2/3/2021	Not specified	Yes	Given the number of students who were doing remote learning, it would not be fair to have state assessments this school year. In addition, we have many students and teachers who were quarantined during the course of the year. There are too many inconsistencies and gaps in instruction to make any test valid. Many students Social Emotional state at this point will not allow them to perform to their utmost ability.
348	2/3/2021	Not specified	Yes	I support both waivers.
349	2/3/2021	Not specified	Yes	I support both waivers. Testing is biased and should not be used to determine a child's ability. There is a history of systemic racism in standardized tests. Judging a school's success based on test scores is a not sound educational practice and especially preposterous when a pandemic is raging.
350	2/3/2021	Parent	Yes	I support both waivers. I do not support teachers teaching for standardized testing and do not believe it is a fair representation of the school not child. Judging schools based on test scores is a bad idea generally, and especially preposterous when a pandemic is raging.
351	2/3/2021	Parent	Yes	<p>I am a [REDACTED] public school parent of a 3rd grader and I support the NYSED's request to suspend state testing this year and waive all ESSA accountability requirements in 2020-21.</p> <p>My neighborhood in [REDACTED], was among the hardest hit when the pandemic's first wave occurred. Let me tell you what that time was like. Ambulance sirens filled the air all day and night every day, blaring past our window on the way to [REDACTED] Hospital. This hospital then became completely overwhelmed with Covid cases and had to turn patients away. Then came the stories of neighbors dying and their children being left orphaned and homeless. Our social media were filled with GoFundMe's for funeral services. My sister and other healthcare worker friends and family didn't just lose patients, they then started losing staff as nurses</p>

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				<p>started to die. Keep in mind these are all families with children who are your students, and their trauma is not fiction, it's their lived reality. They don't have time or bandwidth to dial into your community engagement Zoom meetings because they are still trying to stay alive.</p> <p>In addition, another perspective: during lockdown, my son has not received many of his legally mandated IEP accommodations during his overcrowded remote classes. So while our family has been blessed to avoid death and housing loss, we are experiencing learning loss --not through any fault of our own but through the City and State's failures to allocate funding to their legal obligations to special needs learners. This is in fact true for a vast majority of [REDACTED] 200,000 students with disabilities.</p> <p>Now taking the above into account you can see that forcing students to take academic assessment tests is not only cruel but will not capture the measurements you are looking for. You simply must use some other measure other than student performance on tests to determine which school communities should be invested in.</p> <p>So again, please suspend state testing this year and waive all ESSA accountability requirements in 2020-21, and put the money you would use for that towards supporting the school communities who need it the most.</p>
352	2/3/21	Parent	Yes	I support both waivers - please eliminate all state testing.
353	2/3/2021	Teacher	Yes	I strongly believe that there should be a federal waiver of State testing for the entire 2020-2021 school year. As an educator attempting to teach hybrid classes I have found that not all students have access to equal technology. Our district has given all students a chrome book to use, but student access to the internet varies by the quality of the service, the method of internet access and the number of children attempting to use that access daily, where the more children in a household the lower the bandwidth for the children to attend on zoom. Attempting to teach students what they must know in order to complete a Regents exam is nearly impossible under such circumstances, not only among the many districts in the state, but even within a district population. I strongly urge NYSED and the Board of Regents to apply for a federal Waiver for this school year, and possible, next year as well if the ongoing situation required it.
354	2/3/2021	School staff	Yes	I support both waivers. 3-8th grade tests are not appropriate or fair in the best of times, and certainly administering them in a pandemic where student academic learning has been significantly interrupted, would put undue stress on students, families and educators and pose a serious public health risk. Our students, families and educators deserve much more respect than this. The same goes for the Regents tests. Further stress at a time when folx are downtrodden and bearing the burden of a pandemic in very real ways is not human public

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				education policy. Please show some mercy and realize that the learning that students and the rest of us are doing is significant but does not fit the tests.
355	2/3/2021	Not specified	Yes	I support both waivers. Judging schools based on test scores is a bad idea generally, and especially preposterous while this pandemic is continually ravishing the country.
356	2/3/2021	Not specified	Yes	I support both waivers.
357	2/3/2021	Not specified	Yes	I support both waivers.
358	2/3/2021	Parent	Yes	I support both waivers. In the midst of a global pandemic during which students have experienced chaotic learning experiences, it seems both unethical, inequitable and unproductive to maintain a high-stakes testing regime.
359	2/3/2021	Teacher	Yes	Please just cancel the state tests. We're doing everything we can for the kids right now. Don't do this to us and to them.
360	2/3/2021	Parent	Yes	<p>(Attached Letter)</p> <p>I'm writing to voice my support of waivers for the 3rd-8th grade annual state tests and also for the Regents Exams.</p> <p>I strongly believe that the New York State Board of Education should prohibit high-stakes consequences for elementary school students as a result of standardized testing alone, and instead assess a student's proficiencies by looking at an assortment of criteria in multiple subjects, including the teacher's assessment, classwork and homework.</p> <p>High-stakes testing consistently shows racial and economic bias, and also penalizes students who are not good test-takers, but may be proficient in all other areas. It also encourages teachers to "teach for the test," rather than following an immersive, more creative syllabus that results in much deeper learning. I have seen this firsthand, as my son moved from an elementary school that engaged in such test-prep, to a middle- and high school that did not.</p> <p>Especially during this time of the pandemic, when kids of color and low-socioeconomic realities are statistically disadvantaged in their learning environments, please do not allow this additional hardship of standardized testing to increase the gulf between our youngest New Yorkers.</p>

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361	2/3/2021	Parent	Yes	Through this email I want to express my support for both test waivers since I believe that giving these tests or judging schools based on test scores is a bad idea generally, and especially preposterous when a pandemic is raging.
362	2/3/2021	Not specified	Yes	Let's take our accountability off the backs of our children during a global pandemic and beyond. We know standardized test scores measure economic privilege. Perhaps we can do that without stressing out our kids.
363	2/3/2021	Parent	Yes	<p>I am writing to request that you consider cancelling State Assessments and Regents exams for this current school year.</p> <p>My 7th grader and 9th grader are currently in a Hybrid model. While I continue to be impressed with what our district administrators and teachers are doing to educate all students in our district it does fall short of what students have received in past years. As such I do not believe it is to anyone's benefit to assess the students in the same way this year as in years past.</p>
364	2/3/2021	Not specified	Yes	I just wanted to bring to your attention that I strongly support both waivers.
365	2/3/2021	Not specified	Yes	<p>I wanted to reach out to you today to request that all standardized testing for all grades in the [REDACTED] be waived for all spring state testing at the elementary, middle, and high school levels for the remainder of the school year 2020 - 2021.</p> <p>Given the ongoing pandemic as well as remote learning it is not fair for our students, who have not learned in a traditional setting for almost a year now, to be required to take these tests. They would be at a great disadvantage.</p>
366	2/3/2021	Other	Yes	<p>[REDACTED] acknowledges that the request for a waiver from the New York State Education Department (NYSED or "the Department") is based on the accountability requirements in Sections 1111(c)(4) and 1111(d)(2)(C)-(D) on behalf all Local Education Agencies (LEAs) in New York State and does not specifically apply to Career and Technical Education three-part technical assessments.</p> <p>At the request of [REDACTED] administrators throughout New York State, [REDACTED] supports the reasons stated by the Department in their request for this waiver.</p> <p>Based on the November 5, 2020 memo from Interim Commissioner, Betty Rosa, [REDACTED] understands that the Department has not yet made decisions with regard to June Regents.</p>

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				<p>“The Department has not yet made decisions about the June and August 2021 administrations of Regents Examinations or any of the other State assessment programs. The Board of Regents and the State Education Department will continue to monitor data related to modes of instruction amid the ongoing pandemic. When it is time to decide about these Regents Examination and other State examination administration periods, those decisions will be fully informed by all available and relevant public health and educational data. And as always, we will put the health and safety of students and teachers first.”</p> <p>On behalf of all [REDACTED] students in New York State we ask that the New York State Education Department consider waiving the required Career and Technical Assessments with the same fidelity and timeline as the administration of Regents Examinations.</p> <p>Our request is based upon:</p> <ul style="list-style-type: none"> <li>• the reasons the Department stated in their application for “Request for a Waiver of Statutory and Regulatory Requirements of the Elementary and Secondary Education Act (ESEA) on behalf of all LEAs in New York State”</li> <li>• CTE Technical Assessments being a component of the 4 + 1 Graduation Pathway and held to the same standard as the Regents Assessments</li> <li>• the fact that a technical assessment must be passed by a student in an approved CTE program in order to receive the technical endorsement on a Regents diploma, however, it is not required for graduation</li> <li>• frequent pivots to remote learning decreasing time spent with practical applications and assessment preparedness</li> <li>• the knowledge that the results may skew the technical endorsement outcomes and negatively impact students</li> <li>• properly administered technical assessments need outside proctors and evaluators which is prohibitive during the COVID 19 Pandemic</li> <li>• potentially skewed results are connected to Perkins reportable data</li> </ul> <p>high costs of administering technical assessments and a negative fiscal impact during COVID 19 pandemic</p>
367	2/3/2021	Parent	No	<p>Why can't the tests be administered online? At a time when educational progress is unknown, we need assessments more than ever. Take responsibility and let everyone know how well our kids are doing, so we can figure out our next steps!</p>
368	2/3/2021	Not specified	Yes	<p>I support both waivers.</p>

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369	2/3/2021	Parent	Yes	<p>Although I am usually in favor of state tests in order to objectively determine a student's educational level in any given year, I find it extremely unfair to administer the tests this year given the current status of the [REDACTED] being closed. These school are not effectively teaching (my child is "in class remotely" maybe 20 minutes out of a 90 minute class...the rest of the class is "independent work time" so any testing to really measure grade-level aptitude given they basically have not been in a class and teaching themselves for almost a year would be flawed. Please grant the waiver for the ELA and Math tests this year.</p>
370	2/3/2021	Teacher	Yes	<p>The inconsistency in learning and disparity between those who have access and those without throughout the past school year exacerbates existing inequities within the education system. Any testing conducted after such inconsistencies would be invalid as a measure of student performance or proficiency, and therefore should not happen.</p> <p>Remote and hybrid instruction is a necessary but inadequate substitute for in-person learning, and as a result student comprehension of key concepts has suffered. Any assessments broadly administered cannot take these discrepancies into account.</p>
371	2/3/2021	Not specified	Yes	I support both waivers.
372	2/3/2021	Student	Yes	It's very unfair to have any exams this year because we students literally learned nothing this year we are in stress and some of us still use one device for work.
373	2/3/2021	School staff	Yes	<p>I will spare you from reading the repetitive argument of how unfair this year's state test will be this year, and instead offer you a different perspective:</p> <p>By administering the test this year, you are endangering the health of those in charge of the test.</p> <p>I am an elementary learning specialist for grades 2-4. This year our district has opted for paper tests, as CBT is an impossibility this year. I am in charge of organizing every single exam booklet and answer sheet, as well as distributing necessary materials such as rulers and protractors. If this test is given, I will be forced to handle the materials of every single 3rd and 4th grader in my school. Our school policy is that once a child touches a book, that material must be quarantined for 3 days before another individual can touch it. Now we will be forced to handle materials minutes after they have been in close contact with students. While the risk of transmitting this virus through surfaces is low, data shows that it is still a possibility.</p> <p>As teachers we've already sacrificed so much to keep our students, ourselves, and our families safe. I urge you to protect our health and safety during this challenging time.</p>

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374	2/3/2021	Parent	No	I believe that state tests are crucial in assessing a child's ability and which school they will continue to learn at. Furthermore, tests encourage students to work hard to get into a school of their choosing, which will help them grow and understand that they must work hard to achieve what they want. State tests should continue to be held.
375	2/3/2021	Parent	No	<p>I am writing to express my concern about potentially cancelling state-wide exams and request that you do not cancel exams.</p> <p>Exams are a critical data set to monitor academic progress. My children and others across the state and working very hard this year and should have the opportunity to show how much they have learned. Please do not cancel the exams.</p>
376	2/3/2021	Parent	No	<p>(The original Spanish text was translated using Google Translate):</p> <p>I am writing to you to communicate my complete opposition to the idea of not taking the annual assessment exam again.</p> <p>The only way to know if all the effort made this year has paid off and if our children will need more support next year is with an evaluation. Failure to administer the test will only prolong the uncertainty and expose us to (unknown word) measures.</p> <p>In my opinion it is a way of abandoning our children and not taking responsibility for their work. The truth even if it hurts is better than ignorance</p>
377	2/3/2021	Not specified	No	We think that [REDACTED] is dumbing down the educational system by not testing and eliminating all standards. We are in a race to the bottom. Europe and China have stricter standards. When will we wake up and raise everyone up to higher standards instead of sinking lower? China and other countries will surpass us in science, medicine and technology and we will wake up too late.
378	2/3/2021	Not specified	No	The SHSAT Is a Must for our children to compete and get to the best schools they deserve! It's so unfair and doesn't make any sense to waive it. Our kids work hard and study at evenings to get to the schools according to their achievements not impersonal and not appreciated lottery.
379	2/3/2021	Teacher	No	As an ENL teacher, I believe it is essential to offer the NYSESLAT and allow our students to move up to the appropriate level, reducing service time in some cases. Districts can figure out how to make it happen for the remote students. Those students can also waive their right to take the test this year.
380	2/3/21	Parent	Yes	I am mother of 6 grade student. I would like to request department of education not to take state test for middle schools because kids are not able to learn on remote as they were learning from school. Everyone is working so hard in remote but still going to school and learning in person make some difference. Every single day spending



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				with teachers and students in school effect kids knowledge. So it's a humble request not to take state test this year .
381	2/3/2021	Parent	No	I don't want you to waive state tests. I want my daughter to take the State tests to see how much or how little she is learning.
382	2/3/2021	Not specified	No	There is no reason not to administer the exams again except to hide the failing of the education system under [REDACTED]. I think the exams should be offered.
383	2/3/2021	Parent	No	As a parent of three [REDACTED] children who have attended public schools, I request you have the State ELA and Math tests to be administered for the best interest of the kids and our city. This is a measure of performance and will give the student the best opportunity to achieve his or her goals.
384	2/3/21	Teacher	Yes	It is evident that no child in NYS has had a " normal" academic year. The NYSESLAT is administered assuming there is some level of uniformity for students as a basis for assessment. This year there is only abnormality which is common to all. The NYSESLAT if administered, will be an exercise in futility. An anecdotal report by teachers of gains, challenges, future focus, will be more useful for teachers of these students than questionable" results. "
385	2/3/2021	Parent	No	<p>The failure to administer state testing last year was understandable given the onset of the global pandemic and the uncertainty as to how to administer exams when the transmission, treatment, etc of COVID-19 were still uncertain.</p> <p>This year, New York State and [REDACTED] in particular cannot risk the loss of state testing to serve as a barometer of the relative quality of instruction for my children.</p> <p>The [REDACTED] have taken advantage of this crisis so that attendance doesn't count, grades don't exist. Giving everyone the state test is a way to benchmark the performance of our children.</p> <p>Secondly, New York State teachers should all be vaccinated by the time of state testing. Therefore, there should be no safety or health concern for the teachers. Infection rates among children remain lower. The CDC has said that school is the safest place to be during the pandemic.</p>
386	2/3/2021	Parent	No	Please keep state exams this year. Unfortunately, without these tests there is absolutely no accountability for the level of education our students receive this year. The [REDACTED] has made too many changes already under the guise of the pandemic and there should be accountability for the educational achievement of students through state tests. Our children deserve accountability from those in charge of their education, especially during this challenging time.

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387	2/3/2021	Parent	No	<p>As a parent of [REDACTED] public school student, I am writing to request that this year's state exam should take place. [REDACTED] kids have suffered a lot during the covid 19. They are at greater risk of lagging behind private school students and students from other states in the absence of academic measurements.</p>
388	2/3/2021	School Staff	Yes	<p>I hope all is well with you and your families during this time. Please reconsider not giving the state tests this year. WE are in a pandemic and to think about testing our students will be unfair and unjust. The playing field is NOT that same across the board with all the schools. Some schools are back 5 days and others are slowly returning.</p> <p>Staff members, teachers, students and loved ones have all been affected by this pandemic. Our staff and teachers have been sick with COVID-19 and often times there is not enough of staff to teach the students. Parents of students have died as well as close loved ones. Unfortunately, we had a student who passed away from COVID-19. Please think about what you are doing and think about the well- being of the students and staff/teachers.</p> <p>At this time, you can not be thinking about the money but the mindset of the students. How will we social distance for the State/Regents exams? How can we administer testing under the conditions of social distancing, wearing face masks, disinfecting surfaces and now you are adding paper, pencils, pens and calculators into the equation. How do you expect to keep all students and staff/teachers safe during testing?</p> <p>I understand that you think testing is important but is it really. Does the test you take back in school land you a job, get a family, buy you a house-no. It is the person who gets the job because they went to school. Maybe, down the road has a family and buys a house. This pandemic is changing our world that we live in and all you care about is testing. STOP! THINK! Are these tests really important to you?</p> <p>The test scores drives the schools to come up as a TSI or CSI school. Look, we are trying to do our part by providing a safe environment for our students to learn in. Provide Social and Emotional Learning. Social distancing, making sure the students are wearing their masks, not touching anyone or anything, hand washing, taking temperatures as well as trying to teach. We should not be worrying about targets and the goals we need to come off the list. Most of us are on the list because the students opted out of taking the test. That was not our fault but Parents who felt that these tests are not necessary. Think about the students. Again, this has to stop.</p>

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				Maybe, you should put your money into something else and not these tests. Please reconsider not because I am asking you to but think about the world we are living in today. I do not know about you but this pandemic is taking over our lives and so is your testing.
389	2/4/2021	Not specified	Yes	I support both waivers.
390	2/4/2021	School staff	Yes	We have students that are both remote and in person. These remote students are remote because they are medically fragile and have compromised immune systems. I know their parents will be wary about bringing them into school or meeting in any public place to complete the NYSAA. For students like mine in the 12:1:3:1 program this test requires multiple sittings and this would require multiple exposures between these remote students and their teachers. This would not make their families comfortable for their students and I would not be comfortable putting them in this position. If it can not be fair and equitable for all then it should be waved.
391	2/4/2021	Not specified	Yes	Given the varying circumstance in each school district, the only fair and appropriate decision at this time is to seek waivers to forego testing and accountability requirements for the 2020-21 school year.
392	2/4/2021	Not specified	Yes	COVID-19 has impacted our school community greatly both mentally and physically. We have many families who lost family members, their job and their home. Even with the countless effects of school districts to bring consistency with educational programs, students have had interrupted education. Students are transiting from remote to in-person and some are struggling when learning remotely. Each school has their own unique issues they face and equity is a concern. Districts with high health and families that are able and fortunate to work from home offer many more supports to students during remote learning and the COVID crisis. Other children are not as fortunate. Mental health is at an all time high. Schools are experiencing more students attempting suicide and committing suicide. Students being placed in mental health facilities are increasing. During this pandemic we need to assess what is truly important. Assessing students during a time when they are already experiencing tremendous pressures and anxiety is not the answer. We will have ample time in the future to begin assessments, what we need right now is to invest funds that would have typically been spent on the development of assessments to creating programs to support our most at-risk populations to get them back on track.

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393	2/4/2021	Parent	Yes	I feel Regents Exams should be cancelled. My daughter has been in quarantine different times and she doesn't learn much from home. The teacher is teaching those who are able to attend class while the ones who get quarantined are left to figure it out on their own with little to no help. The teachers are good but stretched thin trying to teach in class and quarantined children. Because of this I don't think she will be able to successfully pass the History Regents.
394	2/4/2021	School Staff	Yes	As a fully remote teacher of 3rd grade, I fully support the canceling of all state testing including regents exams. While students are learning, due to the pandemic, the rate and volume of content has been impacted and these impacts have not been standardized. Teachers are tasked with deciding what standards to leave in and what to leave out to assure students are learning and not just covering content. In addition, as students are working from home and we have no way of measuring the input or "help" from parents, the internet, etc., we can not truly measure student learning.
395	2/4/2021	Student	Yes	Please it's not fair to take any exams this year and plus all of us are having WiFi difficulties too so please cancel every exams. It's very unfair because this year is for healing not to take any state exams. It's very unfair because this year is for healing not to take any state exams
396	2/4/2021	School staff	Yes	With remote learning and hybrid models for this year, it has had an impact on the way our students learn. This year has also added some stress to our students and as a parent I believe we should skip testing this year. Many teachers are well aware of their students abilities. On top of this pandemic, testing will continue to add to the stress and many schools will have a hard time administering the test safely and fairly. As far as regents are concerned NY is one of very few states that require them, and they put some of our students at a disadvantage. Out of state students get to attend NY colleges without a regents diploma however NY students are required to have a regents diploma just to graduate Highschool. In addition, I would also believe that administering regents several times a year throughout the state is expensive, and that money could be better spent.
397	2/4/2021	School staff	Yes	<p>This has past year and a half has been a very tough time. My students have been in and out of their routine both at home and school. There have been slow and stagnate progress made by students. Many students have suffered both physical and mental health declines. I fear that adding in the element of state testing would prove to push students even further away from progress.</p> <p>Thank you for taking the time to read my comments on this matter of state testing.</p>
398	2/4/2021	School board member	Yes	<div style="background-color: black; height: 1.2em; width: 100%;"></div> <p>I wanted to take a moment and share my concerns with the planned state testing for our 3<sup>rd</sup>-8<sup>th</sup> grade students as well as Regents exams for High School students this year. While I do not agree with all standardized</p>

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				<p>testing, I do acknowledge the need to measure student progress from year to year. I will be frank and say that our current system is flawed and produces inaccurate results. The 2019-2020 school year as well as the 2020-2021 school year have been unique do to the pandemic. While I applaud the effort that teachers have made to continue delivering quality education despite the restraints that have been placed upon them because of the pandemic, I feel that the majority of students have not obtained the knowledge needed during these academic years to perform well on these tests. There has been nothing “standard” about education this year. While everyone is trying their best, students across the state as well as the country are being taught virtually, on a hybrid model, in person and most often a constant mix between the three styles because of quarantines, staff/student absences etc. Special education students are not always able to receive their accommodations, elementary students are trying to build a strong foundation in basic skills over a computer screen, high school students are trying to master complex material and prepare for Regents exams in order to graduate without the ability and benefit of in person instruction. Children are very resilient and most have a better working knowledge of technology than adults but, they are still kids and they are not miracle workers. Speaking as a parent of two, I see how my highly intelligent college student struggles with course work and lab work at a collegiate level on line. It is not the ideal way to learn and certainly not what she signed up for when enrolling in college. However, she is older, more mature and has a strong base of education to work from in order to ensure her success. Her sister is also very intelligent and is taking accelerated courses and college courses as a sophomore. Unfortunately, even I can see that her level of understanding of material is not where her sister’s was at that age because of the pandemic and compromised delivery of education. Her anxiety level is high already because she is worried about passing her regents exams this year. Despite her best efforts and those of her teachers she knows her performance will not be what it could have been given better circumstances. My children are lucky, they are older and are not special needs students. On a normal academic year they do not struggle with their courses. That is not the case for so many students across our state though. Students that need one on one instruction, small group instruction, modified materials etc to be successful. We have asked so much of our youth and our educators over the course of the past 2 school years and they are all working hard. Unfortunately, I do not feel it is enough to see much success with testing this year. It is unfair of anyone to expect successful performance on tests this year. I implore you to waive the testing requirements this year for all students and do not hold them accountable to the same level of achievement of students that have not had to learn under these uncontrollable conditions. Perhaps, this can be a starting off point to really evaluate our standardized testing in NYS and make necessary changes to truly assess a student’s academic achievements. Thank you for your consideration in this matter.</p>
399	2/4/2021	Parent	Yes	<p>I think this would be a tough year to implement state testing. Also, in my opinion, with my last child as a senior in high school this year, I think the testing is of limited overall value. Many children over and under "perform" on these tests and the tests are very stressful for all involved. I understand that a benchmark for learning is needed,</p>

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				<p>however, the NYS grade 3-8 tests, do not fit the bill. I would also be in favor of changing the math related regents examination back to being a math competency examination versus a test of the common core. It should be possible for children who do well in class to do well on these examinations. I am speaking from a privileged position with my children attending private schools. I cant imagine how difficult it is for some students to even pass these in some other places and I do not believe they currently reflect competency.</p> <p>My average performing children on 3-8 assessments, are now straight A high school students and straight A college students. I know that there are other students which are the opposite. I would be in better favor of a break from these, and a restructure of the performance standards for schools and children so that all can be more productive. I am sure the education experts have some ideas.</p>
400	2/4/2021	Parent	Yes	<p>Good morning, I am writing in regards from a parents perspective of doing away with the state's standardized testing for the 2021 school year. My child has been very fortunate of going to school full time face to face with his educators. However, speaking with some of his peers parents that opted for fully doing remote distance learning, they are at a high disadvantage. When my student has had to do remote distance learning there was structure, they knew what was expected and the teacher was able to teach to the entire class as if they were in school face to face. However, those students who are strictly remote, are not given the same opportunities. Many of the class objectives are taught by the parent as the teacher only is available during their free period or after school when a student has a question or a parent for that matter when trying to teach the curriculum. There are some aids that were hired just for this reason, but many parents and students that are strictly remote are having to search the internet for YouTube videos or other social media plat forms to find the information they are needing to insure that their students is understanding the material.</p> <p>If you are having to do the state testing, have you thought about how it will be executed? There are many schools that are hybrid, face to face, or refuse to open, let alone the many parents who opted out of in school learning. Distributing the test seems like an impossible task and a lot more work for the educators who are already spread to thin in trying to administer the tests, receive the tests back, grade them, and then submit them to the state. Then will these grade count? If you are solely looking to see if the students did well with remote distance learning, then that is one thing, but there needs to be other factors to consider. There were many parents that were essential workers so they were not there with their children, but a day care provider, grandparent, a different from of care giver. The way a student learns needs to be factored in, and how well that the curriculum was administered by whomever.</p> <p>If you must do the testing, which I feel would add more stress and anxiety to our already overwhelmed students and teachers, then I would not count the test scores against the school district or the student. Use it for the</p>

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				<p>state's data to see if remote distance learning was antiquate (using this term loosely). 2020 and into 2021 has been major let down for our students from not having sports, not seeing friends, the social interaction with peers and adults, the stresses that are in the home from parents/care givers with trying to provide their child with the best education. Trust me when I say this, I was not meant to be an educator and this school year has proven that with common core, many days ended in tears for both myself and my child. My sense of failing my child is huge when it comes to his education. We as parents want what is best for our students and adding more stress on them when they have been living a nightmare for almost a good year now, I personally will opt my child out of any state testing to insure that his mental wellbeing is still intact.</p> <p>Thank you for your time and I really hope that you consider all the perspectives that you will be getting from now until the dead line on the 5<sup>th</sup>.</p>
401	2/4/2021	Parent	Yes	<p>In my opinion these tests need to be stopped permanently. They do nothing but cause stress for districts and students. They prove nothing. A teacher can only do so much to teach all kids the same material - all kids learn differently. Therefore a low score doesn't mean a teacher didn't do it's job and it also doesn't mean the student isn't smart. I worked for 13 years in schools, first as an aide to students with disabilities for 10 years and then 3 years as the principal's secretary. I now take care of my granddaughters and I help them with their homework and during the past year with online school due to covid. I find common core to be the dumbest thing I've ever seen. It's great to teach children different ways but not to expect all kids to be able to do it just one way. I know many parents who feel the same as I do. I hope the testing ends forever and we get rid of common core. Both are useless as ways of measuring a child's intelligence.</p>
402	2/4/2021	Parent	Yes	<p>I write today in support of the waivers to allow the State to forego testing students in 2020-21.</p> <p>As a parent of a 6th-grader and 9th-grader, I am deeply concerned about my children's depth and breadth of learning this year, due to the COVID pandemic. We are so fortunate to live in a community with good internet availability and a district committed to some hybrid in-person learning at our schools. And yet, I see my children struggling at home with concepts across all subjects simply because they don't have access to the learning modes that work best for them. I know for a fact that their teachers are not able to cover all the material in their classes this strange year ... particularly since they spent fall semester catching up from spring 2020 setbacks in learning. We just got my high schooler's report card and he had a 15-point drop in biology from the first marking period to the second. Science classes are his favorite. When we asked him why his grades fell so sharply, he replied that "we've stopped re-learning material from last spring, and now it's all new stuff. I just don't get it as well." That was hard to hear from a good kid who really has a future in engineering, if he has the support of his teachers and coaches, and can build his confidence.</p>

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				Attempting to test students on 3-8 ELA and Math and Regents-level concepts as if it were a "regular" year is defeatist: it demoralizes students when they get low grades because they haven't had appropriate instructional time to master concepts, and does not provide an accurate benchmark to figure out what they've learned, and still need to work on. Please DO NOT require any NYS assessments for K-12 students in the spring of 2021. Thank you for your dedication and hard work!
403	2/4/2021	Not specified	Yes	I believe that the NY State Board of Education should cancel state assessments for all grades (elementary, middle and high school) for the school year ending June 2021. COVID 19 has created significant challenges for students, teachers and administrators this year. The reliance on technology for remote learning (either wholly or hybrid) has inherent and real problems. Internet connections are spotty on a regular basis, especially in rural areas. Technology issues with Google classroom often means 10 minutes or more of a period just ensuring student access to the classroom. This impacts actual teaching time and how much of the curriculum can be covered. For science, remote learning means either no or limited hands-on labs. The very real fact is that, despite wonderful efforts by teachers and students, it is likely that not all the curriculum can be taught this year. I also think that student mental health needs to be considered. A significant number of students are stress and anxious. This impacts how they learn and how they study and how well they are able to take tests. Thus, for this year, I support the cancellation of state assessment tests at all levels. Thank you for considering this.
404	2/4/2021	District personnel	Yes	<p>I wholeheartedly agree with the 2 waivers set forth by the New York State Education Department pertaining to waiving state testing and elimination of the requirement to set accountability levels based on 20/21 school year results.</p> <p>This has been an incredibly challenging and disruptive school year to all. Adding this additional burden and stress on the system not only is unfair but would not measure accurately what our students are capable of given the type of school year this has been.</p>
405	2/4/2021	Parent	Yes	I believe you should an electrician all state testing and regents exams for this school year. I work in an elementary school and also have a 10 th grader. The kids are not getting an adequate education this year and testing would not make sense. Also there is no way that teachers are getting through all the material to prepare them for the tests especially the regents.
406	2/4/2021	School staff	Yes	I am writing to express my support for the accountability and assessment waiver request to be sent to the federal government. I am an 8th grade English teacher at [REDACTED] where we are currently in a hybrid model. About 40% of my eighth graders have been virtual since September and the others I only see two days a week. I have had multiple students quarantined- resulting in them going completely virtual for a while as well.



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				<p>This is a year unlike any other. Despite reaching out to parents &amp; students, I have a few students that I have yet to see, communicate with, or even get work from (not from lack of trying). I have students stressing out about the amount of work I am giving them, despite scaling back to almost 40% (or less) of what I would normally get through in a school year. They have the pressures of taking care of siblings at home, parents being out of jobs, family members getting sick, and just the everyday chaos that seems to plague our world at this time.</p> <p>These students are not prepared to take an English State assessment, emotionally or academically. If you force us to give these exams; opt-outs will be at an all-time high, teachers will have to switch to review and test-prep instead of focusing on student gaps and social/emotional needs, parents will revolt. Not to mention the logistics of trying to administer tests to three different cohorts of students will bring added stress to administrators and educators that are already stretched thin and stressed to maximum capacity.</p> <p>I urge you to bring these comments to the federal government and to be blunt and honest about the situation. This is not a normal year, for anyone, but especially our students.</p>
407	2/4/2021	Not specified	Yes	<p>The tests could be helpful for identifying learning gaps.</p> <p>The tests could DESTROY a work force of teachers who have worked hard to educate and prepare students to the best of their ability in very difficult circumstances.</p> <p>If the tests are used for evaluations or school report cards, I have a feeling there would be an uprising. Each school is running a different plan for educating their students during this pandemic. Some schools have access to a great system and some don't. Some students have internet access, many do NOT.</p> <p>The variables are too grand to consider using state assessment for anything other than figuring out where we go from here. Thanks for taking comments on this topic.</p>
408	2/4/2021	School Staff	Yes	<p>I am a primary remedial reading teacher in a small school that is part of the [REDACTED] I want to express my thought that I am in complete agreement with the need for these wavers for this year. We have students with very different experiences and educational situations this year. I'm happy to know that others recognize the extremity of these challenges that our school staff, and our families and children. face.</p>
409	2/4/2021	Parent	Yes	<p>This has been a crazy year. Our kids are all learning differently. And possibly not learning much at all. There should be NO state testing all. No regents. No standardized testing for the younger ones. Some people are</p>

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				<p>terrible at testing taking but yet very smart. Regardless of Covid I think all these tests should be canceled for good. If not, then at least this year.</p>
410	2/4/2021	School Staff	Yes	<p>Due to the wide variety of educational experiences during the 2020-21 school year, it simply would not be equitable to assess all students throughout NYS in the same way and with the same assessments. In my opinion, any exams that do not directly impact graduation (almost all K-8 exams) should not even be bothered with. Our students have lost enough time this year, we do not need to spend more on testing to gather data which we know is not comparable to any other year. It would be much more equitable for schools to develop their own assessments to evaluate learning of material and determine appropriate programming. The World Language Checkpoint A Exam requirement is a different kettle of fish as it is the first graduation requirement, often completed in 8th grade. This exam could be locally developed however to reflect the skills taught. Even if we resorted to old Proficiency Exam questions we could come up with some measure of our student's abilities.</p> <p>Regents exams at the High School level also must be customized to account for the wide difference in content and skills development provided in various instructional models. Whether these exams are simply reduced in length, content is prioritized, or cut scores (many of which are ridiculously low anyway) are adjusted, something must be done. If these exams are waived two years in a row, you will have a graduating class with no proof of mastery of anything since they were sophomores (nobody's finest hour). Students will be moving on to classes in which they are grossly unready (because they don't believe us and our recommendations at the teacher level) and will simply perpetuate the "participation trophy" mindset. We cannot have an assessment model that punishes students for factors outside of their control but we have to have some measure of progress. My students with single-digit averages have to have that lack of engagement and learning reflected - they are not functioning at a Checkpoint B level and shouldn't be treated as if they are. Conversely, I have students flourishing and a slew of students somewhere in the middle. To have them continue on a path to their Seal of Biliteracy without having a single independent assessment of their ability since 8th grade is not doing them any justice! I do not know the assessments from other content areas well enough to speak specifically to them but there must be some modification that can be done - even if it is "students must complete four of these five sections" of multiple choice, short answer, etc to prioritize content and allow for more flexibility. Provision of more options, reduction and prioritization of content, perhaps more wiggle room - these are all things that need to be done in lieu of simply waiving all end of year assessments at the 8-12 levels.</p>
411	2/4/2021	School staff	Yes	<p>As an educator for the past 23 years in NYS I have seen many changes in education take place. No one could possibly have anticipated the changes due to COVID 19. NYS among many other states have suffered a great deal of pain, sadness, financial, etc. distresses. Adding the requirements to take the NYS regents exams at the end of this school year would be shameful. So many schools are educating their students in various ways it would make</p>

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				<p>it impossible for it to be fair. Just in a 10 miles radius our schools differed in their approach to educating. Some schools were fully remote, HYBRID, in person, etc. It is just NOT fair to those students taking the test to complete these examinations. Our particular school has done hybrid for a month, and in person the remainder of the school year. With that being said our in person classes consist of COHORTS of 3 hour courses for 7 weeks and then class is done for the remainder of the year. How is that even fair to someone taking Geometry in September to someone taking Geometry in May? Which student do you think would do better-the one that just recently took the class or the one that took it 6-7 months ago. Face it- the equity of the exams is done. It simply can NOT be done to be fair to everyone involved even within its own school system, nevertheless in the state of NY. I am asking for approval of the waiver to be accepted in regards to high stakes testing. It's the moral and right thing to do at this time.</p>
412	2/4/2021	School staff	Yes	<p>As a principal in a small rural district, we have faced many academic challenges with our students since March 2020. First, the population I serve is primarily impoverished. Parents/grandparents/guardians lack higher education to support their children's remote learning. In several instances, even the remote hot spots will not work for our students due to the lack of WiFi infrastructure. Student grades are plummeting, student morale is low. Why we would succumb these students to state exams? What would this prove? How will we give these if we are still on hybrid schedules? Test security will be minimized.</p> <p>Even though we are on a hybrid model, seeing our students 2 X per week is just not enough to justify state testing. In addition, how are we going to score the written state exams? The substitute shortage is unbelievable! I am down to a handful of substitutes and would not be able to provide for teachers being out of their classrooms to evaluate the exams.</p> <p>Please let us return to normalcy, provide interventions and remediation to our students and THEN, we can have students sit for state tests 3-8 and Regents.</p> <p>Students, teachers, administrators, and school districts should not be penalized for a pandemic that is out of their control.</p>
413	2/4/2021	Primary Stakeholder Group	Yes	<p>ESSA Comments from [REDACTED] Executive Director [REDACTED] (Attached Letter)</p>
414	2/4/2021	Not specified	Yes	<p>Testing cannot occur this school year. It is foolhardy and discriminatory to believe that all students can attend school in person. While I do recognize the fact that federal funding is tied to testing, I also recognize that the state will be able to receive a waiver. The Regents Board and NYSED should be more concerned with the safety and well being of every child in the state. This includes their physical safety as well as their social and emotional</p>

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				<p>security. Students are some of the state's most vulnerable members of our population. High stakes testing does little to alleviate poverty, homelessness, physical health issues, or psychological trauma that students may be experiencing during a pandemic. The glaring contrast between NYSED administrative leadership and the reality of life and death is clearly violating ELCC Standard 5 &amp; 6 of district leadership. ELCC Standard 5 states "a district level education leader applies knowledge that promotes the success of every student by acting with integrity, fairness, and in an ethical manner to ensure a school (district) system." ELCC Standard 6 states "a district-level education leader applies knowledge that promotes the success of every student by understanding, responding to, and influencing the larger political, social, economic, legal, and cultural context through advocating for district students, families, and caregivers." Standard 5 requires all district leaders to act with integrity and fairness. It is unfair to focus on high stakes testing while students are clearly suffering. Standard 6 requires all district leaders to respond in real time to the real world. We live in the real world. Our students live in the real world. Their needs are not superfluous high stakes testing. It is trauma informed education, social and emotional learning, and physical safety.</p>
415	2/4/2021	School Staff	Yes	<p>As a school leader in the state who works with recently arrived immigrants, I support the application to waive the spring test administration for the state. The need to provide as much space and time for students' learning to happen in a space that is safe, physically, emotionally, and mentally, does not include high stakes testing.</p> <p>In addition to seeking a waiver for required tests at the elementary, middle, and high school levels, I would also like to include a waiver for the NYSESLAT for all English Language Learners. The administration of the NYSESLAT would take precious time away from learning and teaching during the day putting students at a greater loss of teaching and learning time. In addition to the loss of instructional time, the logistics of assessing each student's speaking skills poses a challenge to maintain social distancing. Overcoming these challenges leaves an environment that does not allow for a true assessment of students' skills. For that I engage the continued advocacy for receiving a waiver for the spring test administration for all state exams including NYSESLAT for all English Language Learners.</p>
416	2/4/2021	Primary Stakeholder Group	Yes	<p>Our comments are in the attached document. Thank you for allowing us to share our thoughts. (Attached Letter)</p>
417	2/4/2021	District personnel	Yes	<p>The [REDACTED] remains committed to nurturing the highest academic achievement levels in our students as we recover and rebuild during this devastating pandemic. Our remote instruction plan has been recognized as a statewide model and is continually referenced at the national level among our colleagues in urban education.</p>

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				<p>Our District is equally committed to the safe, equitable, and fair administration of unbiased high stakes assessments to measure student learning, whatever model is employed for instruction. Toward that end, it is clear to us that New York State assessments scheduled for the spring of 2021 cannot be administered safely, equitably, or fairly.</p> <p>Therefore, the [REDACTED] fully and unequivocally endorses and supports the formal request and rationale submitted by the New York State Education Department (NYSED) to waive assessment requirements in section 1111(b)(2) for the 2021-2022 school year.</p> <p>We agree with NYSED that although our teachers, students, and parents have and continue to demonstrate their very best effort to learn remotely, in hybrid conditions, or in-person, many communities, particularly in urban centers, have been marginalized economically, technologically, and without adequate access to the health care they need during this crisis. Taken together, the cumulative impact of these sizable disadvantages has resulted in uneven access, equity, and opportunity for our students to maximize their academic potential. And while the pandemic is to blame for all that has happened to our students and families, it is equally true that, as a nation, we were dangerously unprepared and have been slow to recognize the insidious effect of this crisis especially on high poverty communities of color like [REDACTED]</p> <p>Finally, granting this waiver request will allow us to keep our District focus exactly where it should be at this time: Strengthening the social-emotional well-being of our students that continues to be severely traumatized by this pandemic and the essential recovery work necessary to grow and rebuild the academic skills our students require to compete on a global level.</p>
418	2/4/2021	Primary Stakeholder Group	Yes	Please find the [REDACTED] comments in support of the ESSA Waiver Application attached here. (Attached Letter)
419	2/4/2021	School staff	Yes	<p>I fully support cancelling statewide testing at the elementary, middle school and high school levels. I am a retired teacher who still follows schooling in both my former employer's district and in the area districts where I have retired. The manner in which these districts have handled instruction during the pandemic vary greatly. As such, the quality of instruction the students are receiving is also varied and unpredictable. Several districts switch repeatedly from remote to in-person instruction, where another has stuck with in-person, but greatly reduced time in the classroom.</p> <p>I hear from parents of the struggles their students are having in spite of everyone doing their best to just survive the year. That's what the final tests should be about - how have you survived this year. Many students have been</p>

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				<p>forced into quarantine due to exposures and are sent home with “packets” and online links for the 10 days they are home. They receive no instruction, but are expected to figure it out.</p> <p>This seems to me to be a “no brainer” where a decision is concerned. Do not administer the meaningless tests this year.</p>
420	2/4/2021	Student	Yes	<p>I am a student in 11th grade at [REDACTED] and I believe that having the regents exam would be incredibly unfair to all students. It cannot be denied that students who are able to go into classes, even if it is a hybrid learning matter, receive a far better education than those who learn completely remotely. The regent's exams would not be a measure of students' intelligence, rather it would just show who had the opportunity to receive in-person education. In my opinion, as a student who is currently learning in a hybrid model, it would be impossible for the exams to be fair to all students. Some districts in the [REDACTED] have been completely remote learning the entire year and without a doubt were not able to give their students the same education as they would be able to if they had in-person classes.</p>
421	2/4/2021	School staff	Yes	<p>I believe there should be no testing this year. I teach special and some of my students don't have good internet to do the tests. I think it would be unfair to all students to hold them accountable to take tests. I also think that CDOS requirements should be dropped this year.</p>
422	2/4/2021	School staff	Yes	<p>I agree that state tests can not be administered safely. Schools do not have staff or space due to the pandemic to safely socially distance and provide testing accommodations for students.</p>
423	2/4/2021	Not specified	Yes	<p>I am the parent of a 10th grader attending [REDACTED]</p> <p>I fully support the NYS Department of Education's petition to the US Department of Education to cancel this year's testing program for elementary, middle and high school students. More specifically, I fully support any plans to cancel the June 2021 Regents, just as the January 2021 Regents were cancelled. Our school district, like many others, has not resumed full time in-person instruction. In fact, families choosing a hybrid option in the fall have been given the option to choose fully remote since mid-December in response to the rising Covid-19 numbers, as well as holidays and school breaks. This means that our students have not experienced any less disruption than they experienced in Fall 2020.</p> <p>These times are unprecedented, and the mental health impacts on our teenagers remains to be seen. The addition of stressful examinations would be detrimental to the mental health well-being of our children, particularly high schoolers. As in many other districts, there has been an emphasis on providing as much in-person instruction to younger children. This, in turn, has meant that the educational and social/emotional needs</p>

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				of our teens have been sacrificed. Please do not exacerbate this unfortunate situation by requiring our teens in particular to be subject to state mandate testing.
424	2/4/2021	Parent	Yes	As the parent of two school age children in public school, I support both waivers.
425	2/4/2021	Parent	Yes	<p>I SUPPORT BOTH WAIVERS, AND I'LL TELL YOU WHY:  These assessments have not told us anything for 20 years. They punish children and schools in poor communities and prop up schools that are rich and white. This is no secret, and it's time to admit these tests have failed the very students they claim to help, black and brown children. These tests rob children from real learning, hands on curriculum, arts, music, enrichment, all the things we know feed the soul and nurture learning. Instead, they drill and kill, then punish because a bell curved assessment ends with winners and losers, and that will never change. These tests do nothing to help teachers, nothing to inform instruction, nothing but strip the classroom from a true learning environment. They should not exist in the first place, but while our poorest children are hit hardest by Covid, and when communities of color STILL LACK COMPUTERS AND WIFI FOR REMOTE LEARNING, these tests will do nothing but add to the stress and pain they are already suffering from.</p> <p>We should NOT ADMINISTER these tests. The Feds should drop the requirements. We already know where these children stand, and that is they remain on the outside of what the Brown v Board has promised them. Use the time and money and provide resources to really serve these children. Provide wrap around services to support families, not test and punish them. GET CREATIVE!! Bring real educators into this process and stop with the lobby to privatize and steal our children's data for profit companies. We are talking about children. Have compassion. Have empathy, and provide well resourced, equitable schools and end these tests already! We are so done with this system that kills our children's love of learning. And we are so fed up with a second class education for black and brown children. We must end TSI and CSI designations. Waive these tests now, and then forever.</p>
426	2/4/2021	Not specified	Yes	<p>I support both testing waivers requested from the Federal government. Using tests to assess schools and teachers at any time increases inequity and creates unintended negative educational consequences. In a global pandemic when different families, schools and communities have vastly different resources, challenges and impacts of the pandemic, such testing is preposterous.</p> <p>Suspend tests this year, for starters, then let's work on a more equitable solution for the future.</p>
427	2/4/2021	Parent	No	<p>My son is in Grade 7 now. I think we should keep the state test and open the school as soon as possible so that the kids can have and enjoy real school life. But it is better that we can put off the test dates to ones in June.</p> <p>Remote learning is much worse than in person learning. Please try to let all of our kids can have a normal, happy and healthy school life! Thank you so much!</p>

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428	2/4/2021	School staff	No	<p>I feel very strongly about my position regarding Regents Examinations for June 2021. I believe they MUST HAPPEN. This is probably contradictory to what other teachers have been writing to you, but there are reasons for this. If a waiver for reporting the data, a hold harmless period for teachers and schools is possible, that would be the ideal route.</p> <p>At some point, students need to be held accountable for the instruction they have been given. When it comes to mathematics, students have been using Apps such as PhotoMath to pass classes. These Apps are meant to help students who have questions, but students are using them to cheat. As many assessments have to be completed remotely teachers cannot be certain they are using the Apps for their intended purpose. Students need to have a fire lit under them to realize cheating their way through a course is unacceptable.</p> <p>Secondly, you can't have students graduating high school without having passed a single examination, which is possible under the current situation we find ourselves in. This will devalue the worth of a diploma and colleges could use the remote situation NY has been in to possibly exclude students from entrance for fear of inflated grades.</p> <p>If Regents exams must be cancelled again this year then the Advanced Regents option should not exist. If students want they can take the required Regents exams for the Advanced diploma next year (January and/or June).</p> <p>I know these might not be popular opinions I express, but teachers have been busting their butts trying to maintain a continuum of education while some students are taking advantage of our predicament. They should not be rewarded for this.</p>
429	2/4/2021	Parent	No	<p>As a parent with a child in Kindergarten in the [REDACTED] public school system and a member of our school's School Leadership Team, I'm writing against the proposed federal waivers for state assessments and accountability requirements.</p> <p>While these are is certainly unprecedented times, as with any other scientific (or even athletic) endeavor, more data, NOT less, is needed to ensure that we, as a society, know where are children are academically. If children are really behind as a group, or even as individuals, we should have data to discuss how to manage next steps, not be guessing as to where we are and how to improve. Another parallel, the fact that we have so little visibility into the COVID-19 virus variants even now and are only starting to catch up is exactly how we will fail our children if we do NOT test and provide assessments. We will be flying blind and have no way to look for the root causes of educational, and even societal, issues. Waiving state assessments and accountabilities is only</p>



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				<p>addressing the superficial effects of societal inequality that we are seeing today. We need to go beyond the superficial and the trading of “my opinion vs yours”. We need data.</p> <p>What we do with these test scores and assessments should be the key discussions now. We know that there are societal inequalities built into our educational system. What are the root causes that magnify the inequalities, starting at the youngest ages? How do we fix these and set up children for success in their formative and later years? How do we teach children resilience and problem solving along the way? How do we prepare them for the real world, where competition for jobs and contracts are how the world works, and accurate problem solving and insightful analysis are key to a job well done? The tests and assessments do not address any of these questions directly, but they are a data set along with others that will help shine the light on true educational equity solutions. The tests and assessments do shine the light on where our educational and societal problems show up at the end of the long process. And we can backtrack with other data sets to the root cause. If we cannot identify these root causes, we will not be able to develop the best solution, only another band aid.</p> <p>As a parent concerned for the future of our country’s ability to be innovative and competitive on the global stage that the world today works on, keep the NYS and [REDACTED] tests and assessments. More information and data is the only way we will be able to solve for larger issues that need to be addressed. Current arguments against tests and assessments only address the results of our societal ills, not the causes.</p> <p>Bloomberg reported this week that the US is continuing to lose its edge in innovation. Don’t let the New York educational system contribute to this as waiving state assessments and accountabilities are bound to do.</p>
430	2/4/2021	Not specified	No	<p>We should NOT get the waiver for school testing. It is vital we see how the kids are doing, and where they are</p> <p>We need to know what works and what doesn't....testing is a good way to find that information.</p>
431	2/4/2021	Parent	No	<p>I am a [REDACTED] public school parent. I am writing to request that we give the state test this year. We cannot go another year not knowing where our students are. It is irresponsible to not assess the basic proficiency in math and ELA. We know there is learning loss due to COVID school closures and the subpar remote learning. We need to know where students are so we can support them with remedial education.</p> <p>We cannot and should not fly blind. We must be accountable to public school families.</p> <p>Give the state tests this year. No waiver.</p>

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432	2/4/2021	Not specified	No	I do not think that the tests should be canceled. The testing needs to be completed so that we can see the disparity in learning between the private schools and the public schools that remained open with in person learning during the pandemic, versus the public schools that chose not to. The public schools should be held accountable. We need data and statistics to demonstrate what an academic disservice happened to our children in the public schools. Doing away with testing almost provides permission for the public schools not to whatever they can to do what is best for the children, which is in person learning versus a screen.
433	2/4/2021	Parent	No	I recognize that our students have had a very challenging year and have not had the best opportunity to prepare for these assessments. But those are reasons to administer the assessments — not cancel them. We have never had a year like this and we need data to understand its impact on our children’s progress and determine where our kids stand so we can best help them get back on track. In this case, the data is our friend and we need it.
434	2/4/2021	Not specified	No	I would strongly recommend that the exams should go ahead, I understand that it has been a difficult academic year, but it’s vital to get a benchmark of how the kids are doing. This will help quantify areas which are most impacted by the new teaching styles / regimes, and can also help pinpoint areas or schools where extra resources are needed, or schools that have found techniques that work well and can be copied.
435	2/4/2021	Not specified	No	I am writing to share my views around 2021 testing. I believe that the testing should go ahead this year despite the challenges that experienced over the last year due to Covid.  The testing results will provide valuable data to the parents, teachers, schools and DOE on the amount of progress the kids have made this year while learning in remote or hybrid school environments and which kids/schools have been most impacted. This data will help inform the future learning plans and additional support that kids and schools need.
436	2/4/2021	Parent	No	I am writing to strongly urge you to administer the State ELA and Math tests this year. Millions of children’s education has been severely disrupted by the COVID-19 pandemic. Assessing their learning loss is a critical first step toward fixing this problem. How can help students catch up if we do not assess where the learning gaps are? Waiting another year for a rigorous, systematic assessment of student academic progress is unfair to disadvantaged students who will further fall behind and need immediate help to avoid suffering long-lasting education losses. Thank you for the opportunity to comment on the State test waivers.
437	2/5/2021	Not specified	Yes	I [REDACTED] support both waivers to cancel school testing.

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438	2/5/2021	Not specified	Yes	I agree with canceling State Assessments. As an educator it would be a hardship for our students, especially our Special Education students.
439	2/5/2021	Not specified	Yes	My concerns are many- but the largest common-sense concern is that schools are strapped for space due to covid regulations- how on earth are we going to meet testing accommodations - which are legally required? We are short staffed as well and not supposed to be mixing pods of students. This makes the situation incredibly difficult if not impossible.
440	2/5/2021	Not specified	Yes	Please miss I request to again lease cancel it's very hard this year to learn places it's unfair pleaseee I request
441	2/5/2021	Primary Stakeholder Group	Yes	<p>I am a NYC public school teacher as well as a [REDACTED] public school parent. Full disclosure, I think that state testing is archaic, racist, and cruel, especially to communities of color. Moreover, I find them inaccurate as a measure of learning and as a measure of our school's quality and rigor of education. That's on any day, any year.</p> <p>This year, I fully support the waivers to suspend the state test and suspend schools' performances being judged by the state test. Because there is no way this test can be "standardized." Nothing is "standardized." Students are in their homes, and each student's home life is vastly different. You cannot administer this test in a standardized way.</p> <p>If these waivers go through, I implore you to take this as an opportunity to find other ways to interact with schools this year, to see what they need, and to find ways to figure out what they need that don't involve filling in bubbles with a number 2 pencil. What would that look like? What would the benefits to our most vulnerable communities be? What is your role? Are you being humane?</p> <p>These are questions I ask myself every day in designing my teaching practice. I consider them my responsibility and a huge honor. They are your responsibility too.</p>
442	2/5/2021	School staff	Yes	In this environment with shortened school days, teachers have had to modify curriculum. Without guidance from NYSED, it is not possible to ensure that the same curriculum has been taught. In addition, students learning completely from home have been disadvantaged as it is more difficult for many students due to lack of devices and broadband issues. Some students have been in a hybrid situation and have been able to have in person instruction. I have to wonder if we gave the tests, what would we be testing since the instruction has been so uneven. How would we interpret the results. For these reasons, a waiver seems the only option
443	2/5/2021	School administrator	Yes	On behalf of the Social Studies Department [REDACTED] we strongly endorse the request from the New York State Education Department to receive waivers from the U.S. Department of Education for

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				<p>Statutory and Regulatory Requirements of the Every Student Succeeds Act (ESSA)'s testing and accountability requirements for the 2020-2021 school year.</p> <p>New York has faced extraordinary circumstances in the 2019-20 and 2020-21 school years - straining the capacity of our public education system to provide equitable services across the state. While schools have marshalled resources to pivot to online learning, students have struggled to engage and in many situations, learning has slowed. At Shenendehowa, we have adapted to the needs of our community and are delivering instruction both in-person and through remote learning. However, school has been disrupted. Our attendance rates have suffered. We agree with the Department's position that school instructional time is best focused on supporting students in academics as well as social-emotional health rather than attempting to administer large-scale statewide tests to the population of students that are receiving in-person instruction.</p> <p>We have developed innovative, meaningful and holistic assessments in the Social Studies department to measure student learning. Those assessments are based on the actual instructional program that we delivered this school year. There will be a time and place for statewide summative assessments -- they serve a role -- but this is not the year. We agree with Chancellor Young, Jr.. State assessments cannot be safely, equitably and fairly administered to students in schools across the state this school year.</p>
444	2/5/2021	Superintendent	Yes	<p>The proposal to administer the NYSESLAT, only to those ELLs who attend in-person school at least some days of the week, for the sole purpose of determining if they can exit ELL status, is a prime example of unfairly targeting a portion of a subgroup of students, especially when no other student attending school in-person would be subjected to any type of state assessment.</p>
445	2/5/2021	Not specified	Yes	<p>I support both waivers.</p>
446	2/5/2021	Student	Yes	<p>I am a junior at [REDACTED] I have spoken with many students and teachers over these last 5 months. What I have heard combined with my own experiences have led me to writing this email about regents testing. I think that regents should be canceled for a few reasons.</p> <p>1) I have spoken with many of my fellow students and even some teachers and I have found the same general consensus. Nearly every class is behind and students are rushing to get the large amount of homework and studying done each and every week. Teachers have less time to teach the same amount of material. I have found this to be true in nearly every class I have. Many students like myself are very worried about how they will perform on regents this year because of the lack of time spent on difficult subjects. As a junior, this year is crucial</p>

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				<p>for me. Taking the regents without the full amount of education and class time is terrifying. I have also found this fear is not exclusive to me. Everyone I have spoken with on this has expressed the same fears about taking the regents with 80% or less of the time to learn the material on them. Many of us have started to try and teach ourselves material to try and get ahead. Students are panicking, if regents were canceled, it would improve students quality of life and be fair to them after receiving a poorer education due to the circumstances. It would also allow students to focus more on what is in front of them and learn it better rather than always thinking about what they are missing. The cancellation of regents would also allow teachers to take a little more time to make sure students are really getting the material rather than steamrolling through subjects. Having a simple final at the end of the year in each class based on what the students have actually learned is fair. Teachers would be able to evaluate what is the most important to teach and over the coming years, any small subjects that are missed could be smoothed out. This is fair.</p> <p>2) The second reason is that certain classes, like language, are built over several years. With the last 3rd of last year being swept away and this year being the way it is, students have not had the required amount of time and teaching to be able to take the language regents. I have found this to be true for me and my fellow classmates. Language teachers could instead teach the most important parts of the curriculum and smooth out the cracks in years to come. Having a final at the end of the year based on what students have learned rather than what they should have learned in a normal year is fair.</p> <p>3) The 3rd reason is an economic one. My high school is in an affluent town. My high school has access to resources that a lot of poorer high schools don't. For example better equipment for teachers and more devices for students who don't have one. If me and my fellow classmates are struggling this much with the resources we have, I can only imagine how hard it must for less fortunate schools. Canceling regents would allow for much more leeway for schools to work within their boundaries instead of spreading themselves too thin. This is fair.</p> <p>4) The last reason is that there is no standard for teaching in these times. I have heard of many schools teaching with different schedules and systems. My school alone has changed its policy a few times. With the constant changes in each school and the lack of a standard, all New York State students aren't being taught in the most effective way. Grading and judging students on the same scale, when the methods of teaching have varied and changed so much across the state, isn't fair.</p>
447	2/5/2021	Not specified	Yes	<p>Please consider waiving the assessments for 3-8 students and Regents Exams. Students have lived through stressful and unusual times that have impacted their mental health and academic progress. Teachers have gone above and beyond but it does not seem reasonable to expect that in a time of closures, quarantines, virtual</p>

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				<p>learning, hybrid schedules, fear of COVID, and dealing with the grief of COVID that we can expect students to be prepared for tests. Please relieve them of this undue pressure.</p>
448	2/5/2021	Superintendent	Yes	<p>It has been acknowledged by Board of Regents Chancellor Lester W. Young, Jr. that, "In light of the ongoing pandemic, we have determined that the Spring 2021 state assessments cannot be safely, equitably and fairly administered to students in schools across the state." Additionally, due to the disparity caused by the fact that more students of color are receiving remote instruction (75% of Asians and half the Hispanics in NYC), it is argued that instructional time should be used for academics and social emotional health rather than assessments.</p> <p>So then, it cannot be considered "safe, equitable and fair" to have the NYSESLAT administered to students "who are able to attend school in person at least some days of the week" to provide the opportunity to exit ELL status. ELLs who are attending school in person need the time to be spent on academics and social emotional health in an equitable portion to their English speaking peers. Moreover, students learning on a virtual platform need to be given the same opportunity to exit ELL status as their in person peers.</p> <p>Specific to our small city school district, only about 50% of our ELLs come to school in person. Therefore, we do not understand how administering the NYSESLAT to half of our ELL population is considered equitable or fair or a good use of the time that they are present in school. Furthermore, the administration of the NYSESLAT would be a logistical challenge given the current circumstances caused by the pandemic.</p> <p>I want to also point out that in a typical school year, ELLs are subjected to the NYSESLAT and ELA exam for their grade level which places undue and inequitable stress on these students. To now subject them to the stress of a state exam when all other students will potentially be exempt only adds to the disparity of expectations that already existed. If the 3-8 exams are waived, our ELLs deserve to have the same opportunity as students who will be given time to focus on academics and social emotional health.</p> <p>Better solutions may be to:          Assume that students who haven't been tested since 2019 will demonstrate growth and unilaterally move them up a level, or Develop a growth model to predict what each student's progress would likely have been and then administer a diagnostic test in September so that districts will have a more realistic and equitable idea of each student's needs.</p>

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449	2/5/2021	Not specified	Yes	<p>I am writing to indicate my support for both waivers. Although the goal behind testing is laudatory, testing has not been constructed so that schools or homeschooling can encourage and develop well rounded learning.</p> <p>Parents who have the resources game the system by having their children learn test taking techniques and extra instruction time beyond what schools/homeschooling give. Rather than being an indictment of the schools or parents who lack such resources, this is an indictment of the tests themselves.</p> <p>Evaluations, such as state testing claims to be, should not be gamable. When they are, as this testing is, they cannot be relied on as accurate, and so lose their meaning as evaluations.</p> <p>All of the above is even more true in the context of the last 11 or so months of pandemic adjustments, stops, starts, etc. Therefore, I ask that you please support both waivers.</p>
450	2/5/2021	Parent	Yes	<p>I am the parent of a middle schooler and high schooler in the [REDACTED]. I strongly support waivers for both K-8 and Regents testing this year. Testing this year will use resources that should go to supporting students and teachers in this difficult time. And it will exacerbate existing inequities. Online tests will be inaccurate and tests conducted in person will not be safe. Passing the relevant classes is a perfectly adequate measure for high school graduation in this context.</p>
451	2/5/2021	Parent	Yes	<p>No two school districts are practicing the same methods, as no two communities are presented with the same challenges of Covid 19. Some have returned to in person learning completely, while others are still hybrid, and some choosing full remote based on the infection rates and concern for spread of the virus at hand. If we cannot get students to be completely in person learning, across the board for safety and health reasons....Why would we expect parents to send their children to school for testing?</p>
452	2/5/2021	Teacher	Yes	<p>We are writing in regard to the New York State testing for the Spring 2021. It is to our dismay that NYS testing is being considered for this year. The students in our care have stated explicitly the anxiousness and intrepidation of taking these assessments. At this time, the students are completely stressed and deficient in many of their skills. To assess students under these circumstances will be completely unfounded or necessary. Any assessment would not be a true reflection of their abilities. Students are worried that these assessments are a reflection of themselves which, under these circumstances, is totally unwarranted. It is of our professional opinion that students do not need to have the burden and stress of NYS testing under these perilous times. Students are worried about their everyday lives, the stresses of family life, and to take the NYS test, just to take them, would not validate their academic prowess. Therefore, we vehemently disagree with students taking the NYS testing for Spring 2021.</p>

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453	2/5/2021	Teacher	Yes	<p>As the K-12 Department Chair of English as a New Language, I wholeheartedly agree with the decision to request a waiver of assessment requirements under ESSA, and I applaud the realizations that the assessments cannot be safely or equitably administered this year and that the focus should be on academics and social emotional health during our limited instructional time.</p> <p>However, I am surprised and disappointed that this understanding doesn't seem to extend to our English Language Learners, despite the acknowledgement that certain racial and ethnic subgroups are at more of a disadvantage because of the increased likelihood that these students are learning remotely (e.g., the 75% of Asian students and half of the Hispanics cited from the NYC survey data). The decision to proceed with administering the NYSESLAT makes it seem that there is a perception that the difficulties faced by these students due to COVID 19 are not impacting them to the degree that they are impacting other students.</p> <p>All students, not just those whose first language is English, need to have instructional time devoted to academics and social emotional health rather than testing. All English Language Learners, including those who are learning remotely this year, deserve the same opportunity to exit ENL. And, most importantly, it must be acknowledged and understood that the adverse effects that the pandemic has had on students are certainly not lessened by students' status as language learners.</p> <p>I believe that there must be a better solution than administering the NYSESLAT to a limited number of students. One possible solution would be to predict average growth based on past assessment scores and use that with the most recent score, either NYSITELL or NYSESLAT, to estimate proficiency levels. Or perhaps, since two years will have passed since the last administration, it can simply be assumed that students have made the equivalent of at least a year's progress, and all ELLs could be moved up a level.</p> <p>The effort to get a waiver under ESSA this year is important for all of our students, and it is one that should include all state assessments. Please reconsider and include the NYSESLAT in the waiver request. Thank you for the opportunity to comment</p>
454	2/5/2021	Parent	Yes	<p>As a parent of a 9th grader who is slated to take a regents in both Math and Science this June, I would strongly encourage that NYS Board of Education to waive these standardized tests for the 2020-2021 school year.</p> <p>These tools are designed to assess skill acquisition and mastery of knowledge across students who are all provided a similar education in a manner that has a degree of continuity. As we all know, this school year has been like no other with fits and starts of on-site, hybrid and remote learning approaches. Some districts blazed through all three in a matter of weeks of opening. Different regions have experienced the unfolding of the</p>



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				<p>pandemic in varying ways and as always, the availability of district resources to counter the negative effects on students' learning have varied.</p> <p>All of this creates a perfect opportunity to take a moment in the midst of this global pandemic to ask.....what would the regents or any other standardized test be intended to measure??</p> <p>We are in a time like no other, and honestly, it would seem that we should be evaluating our students and teachers on - resiliency - commitment - creativity and take a breather from measurement tools that in this moment are hard to view as even relevant.</p> <p>Appreciate the opportunity to comment, but quite honestly am shocked that this conversation has to even happen! There are ways that the teachers that know our students can offer valid assessment of their progress - all with a dose reasonableness given life circumstances!</p>
455	2/5/2021	Parent	Yes	I support both waivers.
456	2/5/2021	School administrator	Yes	Testing during a pandemic would create a false data set, increase the stress on students who have been through enough and tax the resources and staff of schools across the state unfairly. Thinking that a measure of learning in the year of Covid would produce valuable data is hard to imagine. The sheer amount of trauma kids face, the uncertainty, and the number of students -who have out of fear or an abundance caution- who have never even stepped into a school building this year is a real issue to address. The only value in testing would be presenting terrible numbers to the state to suggest we need improvement and therefore money, but even that is reprehensible in these tough times. The time we're not spending on test prep, planning, coordination etc. is all time we could spend on looking ahead to next year's curriculum and ever changing needs of students.
457	2/5/2021	Not specified	Yes	I am in favor of foregoing testing this year due to the pandemic. Given the circumstances and learning challenges that both educators and students have had to endure this year I don't think it is fair to require testing. Also, from different students backgrounds may not have had all the same access to the necessities of remote learning including educational resources required for successful assessment outcomes. It's probable the assessments will cause increased stress for educators and students in these already extremely stressful extraordinary times.
458	2/5/2021	Teacher	Yes	I support the proposal to forego state testing this academic year. Overwhelming disparity among students throughout the state would undoubtedly lead to large numbers of students not able to test, inaccurate results based on disparity of in person/virtual learning among districts, and unnecessary added emotional distress for students that are struggling to survive this distressing time.

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459	2/5/2021	Community-based organization representative/ member	Yes	[REDACTED] like to express our deep concern regarding administration of the New York State Tests. Please see our attached Letter and Resolution detailing the reasons we believe a waiver is necessary. (Attached letter)
460	2/5/2021	Primary Stakeholder Group	Yes	Please find attached a letter in support of the waivers requested by the NYSED for 2021 from [REDACTED]. Thank you for this opportunity and your advocacy on behalf of children, families and educators. (Attached letter)
461	2/5/2021	Community-based organization representative/ member	Yes	I support NYS's ESSA waiver requests for Spring 2021 including (1) 3rd-8th grade testing requirement, (2) the NYSESLAT testing requirement for remote students, and (3) the requirement to designate schools in need of support and improvement (i.e., the NYS CSI and TSI designations).  In addition: (1) Waivers should be requested for NYSESLAT testing of hybrid and in-person students and  (2) Waivers should be requested for the requirement to use 3rd-8th grade test results to remove the CSI and TSI designations from schools currently on those two lists.  None of these tests are needed on an annual basis to determine which schools are in need of additional resource investments. Year after year, these tests provide the same information - that our students in poverty require additional resources. There is no rationale for continuing to expend scarce funds on testing students annually to learn the same information. Our students in poverty and our schools that serve them need more funding. Spending resources on testing annually robs our neediest children of time and money that should be spent improving their learning environment. This year, it is also dangerous.
462	2/5/2021	Other	Yes	We truly appreciate the opportunity to provide public comment on NYSED's draft waivers. Please see attached document submitted on behalf of The [REDACTED] (Attached letter)

New York State Education Department Public Comment Regarding Proposed Federal Waivers (E-Mail)

#	Date of Email	Stakeholder Group	In Favor of the Waiver(s) (Yes/No)	<p align="center"><b>Comment</b></p> <p align="center"><i>Note: Items have been redacted to ensure privacy of stakeholders.</i></p>
463	2/5/2021	Community-based organization representative/member	Yes	Those who developed ESSA's testing and accountability requirements did not take into account the potential for a pandemic's impact on our schools and on our students' and teachers' home lives. Neither did they factor in a student's ability to attend school in-person or remotely, or calculate the myriad ways in which a pandemic would amplify disparities and inequities and disrupt "standardized" testing conditions.
464	2/5/2021	School board member	Yes	The [REDACTED] respectfully submits the attached letter to request a waiver for the 2020-21 school year for the standardized testing requirement set forth in the Elementary and Secondary Education Act ("ESSA") Sec. 1111(b)(2). (Attached letter)
465	2/5/2021	School board member	No	I strongly disagree with waiving State Assessments this year. This is a unique opportunity to measure the effectiveness of the remote and hybrid teaching methods as developed and administered by school districts across the state. Studying the effectiveness of the various techniques developed during this pandemic will allow us to develop plans for the best methods to use during future pandemics and other situations when on campus teaching is disrupted.
466	2/5/2021	District personnel	No	Please know that we support having students continue with testing (for the sake of consistency) in this school year, but we believe there should be NO ACCOUNTABILITY of any type attached to any of the tests at this time due to the challenges of COVID.
467	2/5/2021	Parent	No	<p>I'm writing to politely urge you to ensure that exams go ahead and are administered this year after being abandoned last year.</p> <p>These exams allow teachers and schools to get an honest assessment and comparison point for how classes and individuals are doing.</p> <p>This will allow educators at every level to see which pupils, schools, teachers are performing well and which need the most help, and if resources need to be diverted in any way.</p> <p>It can also highlight any schools that have been particularly effective and this can aid in seeing which models and methods have worked best.</p> <p>Avoiding tests for another year would be counterproductive and is similar to burying our heads in the sand to avoid seeing / knowing the true situation.</p>

New York State Education Department Public Comment Regarding Proposed Federal Waivers (E-Mail)

#	Date of Email	Stakeholder Group	In Favor of the Waiver(s) (Yes/No)	<p align="center"><b>Comment</b></p> <p align="center"><i>Note: Items have been redacted to ensure privacy of stakeholders.</i></p>
468	2/5/2021	Business leader	No	<p>With interrupted instruction taking a disproportionate toll on students historically underserved by our education system, [REDACTED] of civil rights, education, parent, and business groups, of which [REDACTED] is a member, is calling on the New York State Education Department to administer this year's grades 3 through 8 state assessments as a way to measure students' educational progress and the impact of the pandemic.</p> <p>This school year has 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. In this extraordinary context, coalition members remain deeply concerned that the same students who were subject to educational inequity before the pandemic remain most underserved by our education system.</p> <p>State assessment data is vital to understand what the academic impacts of the pandemic have been – and how they differ across districts, schools, and student groups. The results of these summative assessments are essential to designing a path forward for New York State and fulfilling our education system's fundamental responsibility to provide families with consistent, accurate information about whether their children are making progress towards meeting state academic standards – which parents indicated in a recent poll is more important than ever.</p> <p>Recognizing this year's unique circumstances, grades 3 through 8 assessments should be administered in a way that reflects the complexities of the current context and are as useful as possible for students, families, and educators:</p> <p>Offer remote assessments to increase participation among families who are not comfortable with in-person assessments;</p> <p>Provide results fast to ensure that stakeholders – families, school and district leaders, and policymakers – have the information they need to design and align supports in the summer of 2021 and prepare for the 2021-22 academic year;</p> <p>Explore shortening the tests and giving them later in the school year to meet social distancing requirements (for in-person assessments) and recognize the challenges facing students in taking assessments this year;</p>

New York State Education Department Public Comment Regarding Proposed Federal Waivers (E-Mail)

#	Date of Email	Stakeholder Group	In Favor of the Waiver(s) (Yes/No)	<p align="center"><b>Comment</b></p> <p align="center"><i>Note: Items have been redacted to ensure privacy of stakeholders.</i></p>
				<p>Continue to lower the stakes by removing school level accountability measures while continuing to provide support to schools that were previously identified before the pandemic;</p> <p>Direct resources and support to target funding and technical support to the districts, communities, and schools with the greatest needs;</p> <p>Commit to transparency by publicly reporting the assessment results at the school, district, and state levels as quickly as possible, including disaggregated data for all student groups including by race/ethnicity, income status, English learner status, disability status, and housing status.</p> <p>Even if the federal government allows NYSED to cancel state assessments this year, we urge New York State to preserve spring assessments in grades 3 through 8, Alternative Assessments for students with disabilities, and the June and August Regents exams as part of the state's commitment to building back stronger.</p>
	1/28/2021	School staff	N/A	<p><i>NOTE: Please note this entry is not included in the final count because the respondent(s) did not indicate a "yes" or "no" response to the waiver.</i></p> <p>Please advise us on the implementation of the Alternate Assessment during this school year given that other assessments may be waived due to the pandemic. We recently received an email with specific directions to go forward with the administration and need guidance as to next steps.</p>
	1/28/2021	Not specified	N/A	<p><i>NOTE: Please note this entry is not included in the final count because the respondent(s) did not indicate a "yes" or "no" response to the waiver.</i></p> <p>Would the waiver apply to homeschool students as well?</p>
	2/4/2021	Not specified	N/A	<p><i>NOTE: Please note this entry is not included in the final count because the respondent(s) did not indicate a "yes" or "no" response to the waiver.</i></p> <p>Teachers should be determine if their students have been</p>



## COMMUNITY EDUCATION COUNCIL DISTRICT 15

February 5, 2021

Dear New York State Education Department Officials:

**As elected representatives of over 35,000 students in NYC's District 15, we are writing to ask that NYC schools receive a waiver from the NYS ELA, Math, and Science Exams.**

The pandemic, Covid-19, has wreaked havoc on communities in New York City, with over 26,000 deaths so far, leaving countless people out of work, struggling, and fearful. NYC students have suffered significant losses, including deaths of family members, friends and teachers, and summer jobs, and have experienced extensive challenges and inadequacies with remote learning, and have endured inequity in every area, including food insecurity.

Prior to the pandemic, State tests have been shown to be ineffective in their stated goal of identifying schools and districts for improvement, assessing student acumen, and tailoring education to individual students. As such, they are no longer even required by the state for teacher evaluations, due to the evidence and successful activism on the part of parents, teachers, administrators, and students. There are various alternatives to the state tests, which can effectively assess student learning.

The millions of dollars that NYS spends on these annual tests should be put to astronomically better use considering all that is required in providing safe and equitable schools.

We believe that schools should spend time and resources helping students with the academic and social emotional challenges caused by the pandemic and should put equity at the forefront of decision-making. Teachers and school leaders need time and flexibility to address the trauma their students are experiencing without having to worry about test prep.

We wrote to you last year in CEC15's *Resolution to Support Suspension of 2021 State Tests*<sup>1</sup> dated August 25, 2020, with our concerns around the state tests, and again, we ask that NYS tests be suspended for the 2020-2021 school year.

Signed,

Tia Schellstede  
Co Vice President

Camille Casaretti  
President  
Community Education Council District 15

cc:

NYS Governor Andrew Cuomo  
NY State Senator Shelly Mayer  
NY Assembly Member Michael Benedetto  
NY State Senator John Liu  
NYC Mayor Bill DeBlasio  
NYC Schools Chancellor Richard Carranza  
Brooklyn North Executive Superintendent Karen Watts  
NYC District 15 Superintendent Anita Skop

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<sup>1</sup> [RESOLUTION TO SUPPORT SUSPENSION OF 2021 NEW YORK STATE TESTS](https://img1.wsimg.com/blobby/go/951dd9a1-96ac-438b-8642-d89cc6651997/downloads/Resolution%202021%20State%20Test%20Suspension.pdf?ver=1612365945430)  
<https://img1.wsimg.com/blobby/go/951dd9a1-96ac-438b-8642-d89cc6651997/downloads/Resolution%202021%20State%20Test%20Suspension.pdf?ver=1612365945430>



## COMMUNITY EDUCATION COUNCIL DISTRICT 15

### **RESOLUTION TO SUPPORT SUSPENSION OF 2021 NEW YORK STATE TESTS**

*Presented and Adopted at a CEC15 Calendar Meeting on August 25, 2020 by a unanimous vote.  
Members present included: Camille Casaretti, Antonia Ferraro, Tia Schellstede, Kimmerly Scott, Bess Abrahams, Cateia Rembert, Mark Bisard, Claudia Lechuga and Ivan Banda.*

WHEREAS, the pandemic, Covid-19, has wreaked havoc on communities in New York City, with over 23, 000 deaths so far, leaving countless people out of work, struggling and fearful;

WHEREAS, NYC students have suffered significant losses, including deaths of family members and friends and teachers, summer jobs; and have experienced a range of inadequacy with remote learning, and endured inequity in every area, including food insecurity and air quality, exacerbated by the pandemic;

WHEREAS, state tests, even before COVID, have not been effective in fairly assessing student acumen, or tailoring education to individual students;

WHEREAS, state tests have been used to justify shutting down schools and are no longer even required by the state for teacher evaluations due to successful activism on the part of parents, teachers, administrators, and students;

WHEREAS there are various alternatives to the state tests, which can effectively assess student learning;

WHEREAS the millions of dollars that the state spends on the tests can be put to astronomically better use considering all that is required now to reopen schools safely and equitably;

WHEREAS, the stress of worrying about the impact of a particular score can actually harm children and create a disincentive for learning and participation;



WHEREAS; now more than ever, teachers will need flexibility in what and how they teach, and to address the trauma of their students, without having to worry about the mostly rote learning that is required to get a high score on these multiple choice tests;

**THEREFORE BE IT RESOLVED that CEC15 calls upon Chancellor Carranza, Mayor De Blasio and Governor Cuomo to request a waiver from the Federal Government in order to suspend the 2021 State Tests. We believe that schools should spend time helping students make up for the education that they lost during the pandemic, acknowledge the trauma experienced by all, center the social emotional well-being of our students, and put equity at the forefront of decision making.**

SUBMITTED ELECTRONICALLY

Chancellor Betty Rosa  
Members of the Board of Regents  
New York State Education Department  
89 Washington Avenue  
Albany, NY 12234

February 5, 2021



125 Broad Street  
19<sup>th</sup> Floor  
New York NY 10004  
(212) 607-3300  
nyclu.org

Donna Lieberman  
*Executive Director*

Olivier Sylvain  
*President*

**Comment of the New York Civil Liberties Union (NYCLU) in Support of New York State Education Department (NYSED) Application for ESSA Waiver from Standardized Testing Requirements**

Dear Chancellor Rosa and Members of the Board of Regents:

The New York Civil Liberties Union (NYCLU) submits this comment in strong support of The New York State Education Department (NYSED) application to the federal Department of Education (USDOE) for a waiver from federally-mandated standardized testing requirements. The NYCLU would like to thank the New York State Department of Education for considering the needs of students and families and applying for this waiver.

The NYCLU is invested in the outcome of this waiver application because of our longstanding pursuit of equity for young people across New York State. The NYCLU founded the Education Policy Center in 2018 to bring a civil rights and civil liberties analysis to institutions that serve young people, and to ensure our public schools are living up to their promise as incubators of democracy. One of the strategic priorities of the Education Policy Center is to tackle the practices and policies that have led New York schools to become the most segregated in the nation, including high stakes standardized testing (HSST).

In response to the novel coronavirus (COVID -19), public schools around the country are rightfully adjusting their policies with regard to teaching, learning, and testing practices. In the midst of the current public health crisis, a majority of New York schools shifted to remote instruction at some point in the prior and current school years. Most districts made incredible efforts to reach students through remote and virtual means. However, remote and virtual learning is widely disparate for children depending on their home circumstances, the school they attend, and their personal needs. Many students lack the basics required for successful remote learning, such as device and internet access, a quiet study space, and assistance from parents or tutors. Many students are responsible for taking care of siblings or other family members. And many students have lost their primary caregivers to the disease. These inequalities are magnified for Black and Brown communities who have been disproportionately impacted by COVID-19. Given the obvious risks of administering in-person exams during a pandemic, and the undue pressure HSST puts on children and families, the NYCLU fully supports NYSED's application for a waiver.

**Additionally, we urge New York State to continue working towards a permanent system where high-stakes are not attached to standardized test scores.**



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*President*

High-stakes testing negatively impacts schools, educators, and students in many ways: It narrows the curriculum because teachers are incentivized to focus on material that will be tested. Test scores are the basis for separating students into different, often racially segregated academic tracks. Standardized testing harms students with disabilities and those for whom English is not a first language. It pushes good teachers out of the profession and incentivizes cheating. And it leads to equating intelligence with test performance.<sup>1</sup>

President Biden has indicated his administration's strong commitment to addressing racial inequities by issuing Executive Order 13985. The EO states "the Federal Government should pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. Affirmatively advancing equity, civil rights, racial justice, and equal opportunity is the responsibility of the whole of our Government. Because advancing equity requires a systematic approach to embedding fairness in decision-making processes, executive departments and agencies (agencies) must recognize and work to redress inequities in their policies and programs that serve as barriers to equal opportunity." We believe this EO makes it clear that the USDOE must consider how HSST negatively impacts students of color.

HSST has created significant barriers for Black and Brown children to attend schools that are fully funded and have the greatest academic opportunities. While ESSA requirements are seen by some as a means for creating accountability, the truth is schools and districts are rarely held accountable for the fair education of students of color. Year after year, schools with high percentages of Black and Brown students are deliberately under resourced: they have less experienced teachers, they have fewer advanced courses, and even their school buildings are less equipped to keep them safe and healthy. No amount of HSST has ever righted this wrong—quite the opposite. Test scores are used to keep Black and Brown children out of enhanced educational environments, including gifted and talented programs and even highly desirable public schools. They have created stigma for schools and educators, and they have denied students the ability to graduate high school even when they had met every other requirement.

To advance educational equity, New York State must move to a permanent system where there are not high stakes, such as promotion, graduation, or funding, attached to standardized test scores. The Board of Regents must allow students' progress to be determined by those who know them best: their teachers, counselors, and other educators. To ensure that every student is prepared for graduation and a possible higher education, districts can rely on coursework, successful internship participation, and demonstration of learning through projects and practical application. The State needs to move away from a system where children are labeled and sorted into cohorts, and toward one where each student's individual needs are met, speed of learning is respected, and talents are cultivated. New York kids deserve an education system that makes room for enrichment in any area where they excel, without discounting that they may struggle in other subjects, or even have a disability that requires more support. They deserve to learn with and from all their classmates, not in segregated classrooms.

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<sup>1</sup> NYCLU, *Learning During a Pandemic: A Back to School Guide for Parents, Educators, and Students*, at 24, available at: <https://www.nyclu.org/en/publications/learning-during-pandemic-back-school-guide-parents-educators-and-students>.

We applaud NYSED for seeking a waiver from testing requirements this year, because it demonstrates the agency's understanding of what students, families, and teachers are going through in 2021. We believe that any test scores this year would be so tainted by circumstance, trauma, and other factors as to be useless as an accountability measure. But we also believe all test scores are tainted in that way, even when the circumstances are personal, rather than felt by all simultaneously, and as such it is inappropriate to attach high stakes to them. We urge NYSED to make New York a leader in educational equity by replacing high stakes tests wherever possible with multiple measures of success.

Sincerely,



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Donna Lieberman  
*Executive Director*

Olivier Sylvain  
*President*

A handwritten signature in black ink, appearing to read "JEM", written over a light blue horizontal line.

Johanna E. Miller, Esq.  
Education Policy Center Director

A handwritten signature in black ink, appearing to read "Lanessa Chaplin", written over a light blue horizontal line.

Lanessa L. Owens-Chaplin  
Education Policy Center Assistant Director

A handwritten signature in black ink, appearing to read "Reena Patel", written over a light blue horizontal line.

Reena Patel  
Legal Intern



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Cosimo Tangorra, Jr.  
Niskayuna (2022)

February 4, 2021

The Honorable Philip H. Rosenfelt  
Acting 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 the Elementary and Secondary Education Act (ESEA) on behalf of all LEAs in New York State**

Dear Acting Secretary Rosenfelt:

We are writing in support of the federal testing waivers that the New York State Education Department requested for 2020-2021.

Due to circumstances related to the pandemic and the varying educational models being offered throughout 700-plus New York school districts, standardized tests will not adequately reflect the teaching and learning that has taken place in New York State schools since March 2020.

The underlying purposes of assessments mandated by the *No Child Left Behind Act* and successor legislation were to establish national and statewide baseline measurements of student achievement for comparability purposes, to identify students that were falling behind, and to increase accountability for results. So much has changed for schools and students in the last 11 months that these goals for the assessments cannot reasonably be achieved this school year.

We support the waiver requests for the following reasons:

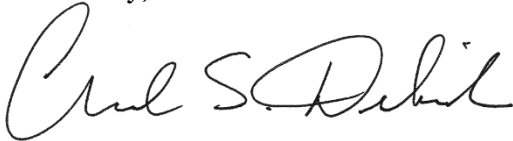
1. We need to trust our teachers and school leaders to measure student progress during this pandemic, as opposed to relying upon mandated federal assessments. Because of the differences in the delivery of instruction, we should allow local educators the leeway to implement models of measurement that truly reflect their district's particular set of circumstances. We trust school leaders and teachers to diligently track individual student performance without administering a federally mandated assessment. The USDOE October 24, 2015 "Testing Action Plan" states that standardized assessments are only one of the measures that should be used. Now more than ever before due to COVID, we need to rely on those other measures.
2. The pandemic has caused immeasurable stress on students and families. From unemployment and food insecurity and anxiety to separation/isolation from friends and relatives, the mental health impact of the pandemic is real. To ask children to add the additional stress of lengthy standardized testing to what they are already

going through is an unnecessary exercise for assessment results that may not be valid. What would standardized tests be measuring this year?

3. The New York State Education Department has concluded that the assessments cannot be administered remotely, that students would need to be in school to take part. To date, a small minority of schools have been able to proceed with fully in-school instruction. We do not know what circumstances will prevail come spring, when the assessments are scheduled to be given. With the social distancing and other requirements needed to protect students and staff from the coronavirus, the necessary variations would likely render assessment results invalid for comparison. The arrangements needed to conduct in-school assessments for all students would add disruption to regular instruction in a school year that has already suffered too many disruptions.
4. Greater flexibility when administering the New York State English as a Second Language Achievement Test is necessary. The waiver will allow students to still “exit ELL status when appropriate.” As explained in the waiver request, “removal of the federal requirements for ELP testing would allow the New York State Education Department to offer the most flexibility to LEAs to ensure that students can test to best inform educational programming decisions.” We support the objective of allowing more local flexibility in decision making.
5. The pandemic has created disruptions in schooling and in the lives of students away from school, and those have affected student learning in ways beyond the ability of schools and educators to entirely offset. It would be wrong to apply accountability designations that would not reflect the true strength of all their efforts.

Accordingly, we support our State Education Department’s request for a waiver from ESSA requirements regarding school and district accountability designations and thank the Board of Regents, the Commissioner of Education and the New York State Education Department staff for advocating on behalf of the children, families and educators who will be impacted.

Sincerely,



Charles S. Dedrick, Ed.D.  
NYSCOSS Executive Director



February 4, 2021

The Honorable Betty Rosa, Interim Commissioner  
NYS Education Department  
89 Washington Avenue, Room 110  
Albany, NY 12234-1000

Dear Interim Commissioner Rosa:

On behalf of the New York State School Boards Association (NYSSBA), please accept these comments in support of the Department's proposed federal waivers to the state assessment and accountability requirements under the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA) for the 2020-2021 school year.

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.

However, given that the ongoing COVID-19 pandemic continues to cause unprecedented disruption to public education in New York and the tremendous negative impact on both the physical and mental health of the entire school community, and in particular on students, NYSSBA supports the New York State Education Department's proposed draft federal waiver requests.

It is uncontroverted that New York State has been one of the hardest hit states in our nation impacted by COVID-19. As you know, after an abrupt statewide school closure last March, the United States Department of Education (USDE) waived statewide assessment, accountability and reporting requirements for the 2019-2020 school year, indicating that students needed to be focused on staying healthy and continuing to learn and teachers needed to be able to focus on remote learning and other adaptations. These needs remain unchanged.

As you are aware, this year districts in New York were forced to choose among three methods of delivery of instruction to their students, all remote, all in-person or a combination of the two depending on each district's local community's COVID-19 circumstances. These local community circumstances have changed and continue to change over the course of this year and have required immediate pivots in many districts back and forth from an in-person or hybrid model to full remote for a period of time causing additional stress on all, and in particular on students.

We already know, even in the absence of being in receipt of state assessment results, that the great majority of students have had a diminished learning experience this year. We also know that there are substantial differences of learning loss among students depending on a variety of factors, including but not limited to, each district's local community's COVID-19 circumstances and the method of delivery of instruction the student has received. In fact, even in those instances where students have been able to attend in-person instruction this year, their learning experience differed dramatically than in years past due to the multitude of COVID precaution measures districts were required to take to make school settings safer.

President Biden in a recent press conference held on January 26<sup>th</sup> indicated that while federal help is on the way, he warned that it is likely that things will get worse before they get better and that it will take months to turn things around.

Given these unprecedented circumstances and timing, it is simply not possible to administer the assessments fairly this year. Accordingly, we respectfully request that the waivers be granted.

Moreover, even in the event that USDE declines to approve the requested assessment waiver, we support the State's separate request for a waiver of ESSA's accountability requirements for the 2020-2021 school year. As mentioned above and as is stated in more detail in the Department's accountability waiver request, New York State school districts and their respective communities have been and remain confronted with the impact of the Covid-19 pandemic. Holding schools and school districts accountable for circumstances that they had, and still have no control over, namely COVID-19, is inconsistent with the purpose of the accountability system.

Thank you for your consideration.

Sincerely,



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*

February 2, 2021

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

Dear Commissioner Rosa:

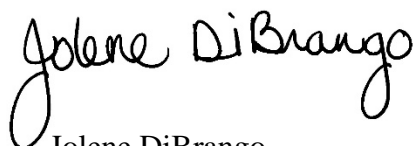
This letter serves as NYSUT's official public comment on the proposed requests for waivers from the ESSA testing and accountability requirements. NYSUT strongly supports the requested waivers. Students and teachers have been through a difficult year as the pandemic rages on in New York. The testing waiver will relieve the pressure students feel over these tests, while the accountability waiver will ensure that schools are not mislabeled.

Throughout this school year there has not been a standardized mode of instruction across the state. Schools have varying degrees of in-person, hybrid, and remote instruction. Without standardized instructional modes, there should not be a standardized test at the end of the year. In this climate it is impossible to maintain any standardization for test administration even within a school district. Equity is paramount and this year, under these conditions, equity cannot be ensured.

The ESSA accountability measures were not designed for the difficult circumstances districts are facing during the pandemic. The accountability system should be put on hold for another year except for schools that could be removed from the list based on previous data.

For these reasons and more we support the two proposed waiver requests.

Sincerely,



Jolene DiBrango  
Executive Vice President

February 5, 2021

Chancellor Lester W. Young, Jr.  
NYS Education Department  
89 Washington Avenue  
Albany, NY 12234

Dear Chancellor Young,

We respectfully request that the U.S. Department of Education grant the New York State Education Department a waiver for the 2020-21 school year for the standardized testing requirement set forth in the Elementary and Secondary Education Act ("ESSA") Sec. 1111(b)(2). Sec. 1111(b)(2) states in pertinent part:

*"Each state must implement a set of high-quality student academic assessments in mathematics, reading or language arts, and science. In the case of mathematics and reading or language arts, these assessments must be administered in each of grades 3 through 8 and at least once in grades 9 through 12. In the case of science, these assessments must be administered not less than one time each during grades 3 through 5; grades 6 through 9; and grades 10 through 12."*

The requested waiver will allow school districts, including ours, to continue to focus on providing services to students that focus instructional time on the immediate academic and social-emotional needs created by the COVID-19 pandemic.

The world is very different from March of 2020 when schools changed to remote instruction for the remainder of the school year. Our district has gone from fully remote learning in the spring to a hybrid model for the 2020-21 school year. Students, staff and teachers in the Fayetteville-Manlius Central School District are working together to adapt as expectations and circumstances have changed. These changes include forced modifications in curriculum and instruction. Testing students using the traditional model and based on standards created outside of a pandemic would place an unnecessary burden on staff and students who are already struggling to keep up with daily teaching and learning. An ESSA-waiver would allow teachers to continue to provide the highest quality instruction possible, tailoring instruction to a hybrid learning model, and remediating as necessary, rather than preparing our students for a test designed to measure "standardized" learning.

In addition, given the tremendous stress the pandemic is causing children this year, our teachers are highly focused on meeting the socio-emotional needs of our students. An ESSA-waiver for the standardized testing requirement would allow our educators to continue to spend more time and energy on supporting our students' mental health needs and wellbeing.

Furthermore, our school district will not be able to physically administer a standardized test this year. Approximately 25 percent of Fayetteville-Manlius students are learning remotely, and without those students being tested, our district may not meet testing quotas in all demographic categories. Additionally, with our cohort model, students who do attend classes in the school buildings are only in class two days a week, so tests would have to be given twice, once for each in-person cohort. Testing would further interrupt regular instruction that is already taking place at a slower pace. We would like to maximize in-person learning days for students, rather than using those precious instructional days for standardized testing.

We are at a time in American history where we are striving to create equity in education for all. The demographic groups who have been most vulnerable to the financial and social inequities created by the pandemic will be the ones least prepared for testing. Testing these students would magnify those inequities. We must protect our students with disabilities, language barriers, and economic disadvantages.

Our request to waive standardized testing requirements does not mean that our district is ignoring the importance of assessing student achievement and needs. Our district goal for the year has been to maintain a level of education consistent with the district's high standards. We created a position this year for an Online Learning Specialist who assists with all aspects of remote learning planning, instructional design and professional development at Fayetteville-Manlius. Teachers have inservice hours every Wednesday with this specialist, and are modifying their teaching and assessment techniques to fit with the circumstances. We firmly believe that a testing waiver will align well with the necessary shifts in educating and evaluating students this academic year.

Ultimately, by eliminating standardized testing this academic year, we can reduce student anxiety and create opportunities for schools to utilize more innovative, meaningful, and holistic assessments to measure student growth and mastery of State learning standards. We respectfully request that testing requirements be waived for the 2020-21 school year.

Sincerely,

The Fayetteville Manlius Board of Education



## *Fayetteville-Manlius Schools*

8199 East Seneca Turnpike, Manlius, New York 13104-2139

Phone: (315) 692-1200 • Fax: (315) 692-1227

[www.fmschools.org](http://www.fmschools.org)

**Dr. Craig J. Tice**  
Superintendent

February 1, 2021

Chancellor Lester W. Young, Jr.  
NYS Education Department  
89 Washington Avenue  
Albany, NY 12234

Dear Chancellor Young,

On behalf of the students, staff and administrators of the Fayetteville-Manlius Central School District and the Fayetteville-Manlius Board of Education, I am writing to advocate for the U.S. Department of Education to grant the New York State Education Department a waiver of spring 2021 state standardized testing requirements.

In March 2020, the COVID-19 pandemic forced our students and staff to transition to remote instruction with very little notice. In the interest of public health, I stand by that decision that was made in collaboration with the Onondaga County Health Department and New York State. However, that abrupt change in how we delivered instruction resulted in a noticeable interruption of the subject area educational attainment expected of our students.

As the pandemic continued, New York state tasked our school district with developing a school reopening plan for the 2020-21 school year that included the option for students to learn, at the discretion of their families, in either fully remote or hybrid instructional models. Since the start of the school year, our instructional staff have been delivering curriculum in a manner as close as possible to a traditional school year, but, to put it simply, our students are struggling with these remote and hybrid models. Some students thrive in a digital learning environment while others crave a return to the classroom on a regular basis.

Among our nearly 4,100 students, approximately 25 percent are participating in school remotely. The remaining 75 percent are receiving instruction three days per week from home. As we saw in spring 2020, remote instruction is again impacting our students' subject area knowledge. Our students, like others across our state, are not learning in the same way that they did prior to the COVID-19 pandemic.

We respectfully request that the federal government issue an ESSA-waiver for the standardized testing requirement so that our staff members are able to focus on instruction and remediation rather than preparing our students for a test that will in no way possibly measure "standardized" learning during this unprecedented time in our nation's history.

In studying the impact of COVID-19 on student learning outcomes, Columbia University researchers have discovered significant disparities in the degree to which ESSA accountability subgroups are receiving instruction through remote learning. Factors such as reliable access to technology and high-speed internet complicate the learning process for students when they are learning remotely, which all of our students do at least part-time.



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We also have concerns as we anticipate that a significant percentage of students who are learning exclusively in a remote setting due to health and safety concerns will be unable to participate in assessments that must be administered in-person.

Based on this information, as well as our own staff members' direct experience with our students, we believe the spring 2021 state assessments cannot be safely, equitably and fairly administered to all students. Our staff members are tirelessly working to support our students and have witnessed how the pandemic has adversely impacted the delivery of instruction to our economically disadvantaged students, children with disabilities and English language learners.

Waiving the standardized testing requirements will allow our staff to focus valuable instructional time on our students' immediate academic and social-emotional needs, ensuring that our most vulnerable children have consistent and comparable access to the supports, services and opportunities needed to achieve improved and equitable educational outcomes.

Please allow us to focus our time and energy on leveling the playing field, or shoring it up, so that all of our students have equitable educational experiences and are not measured against a standard that they simply could not be prepared to meet this year.

Should you have any questions or need additional information, please feel free to contact me directly at 315-692-1200 or [ctice@fmschools.org](mailto:ctice@fmschools.org).

Sincerely,

Craig J. Tice, Ph.D.  
Superintendent of Schools



We, the Mathematics Education Outreach team at the Center for Professional Development and Education Reform in the Warner School of Education at the University of Rochester, are writing to express our support for the request for a waiver of ESSA assessment requirements and school accountability processes as described in the draft letter to Philip Rosenfelt, the acting Secretary of Education at the U.S. Department of Education. In our roles in Mathematics Education Outreach we collaborate with many districts and teachers across New York State implementing professional learning plans and supporting PreK-12 teachers in developing deeper mathematics content and pedagogical knowledge. Thus, we have been in a unique position to observe the wide variety of instructional decisions, and the impact of those decisions, due to the Covid-19 pandemic.

As noted in your draft letter, the response to the pandemic has been quite varied across school districts in New York State with each district making unilateral decisions regarding instruction, fully remote, hybrid, or socially distant in-person. We have observed that even when the structure of the model appears to be comparable, in reality students have very different experiences. For example, students in a hybrid model may have in-person instruction two days a week and remote instruction three days a week. Yet, in some districts this model results in far less contact time with teachers than in others, as remote instruction can mean working in isolation at home or connecting to the in-person classroom via a digital platform. Similar disparities in contact time have occurred between districts that implement fully remote and in-person models. Additionally, other inconsistencies between districts that result in uneven instruction include district choices involving the ability for students to collaborate, use of asynchronous or synchronous remote instruction, and access to digital platforms and tools based on district approval.

Students have often been asked to adapt to issues involved in remote instruction on their own as there are varying levels of technology support across and within districts. While districts have made every effort to provide students with the necessary support, some are better equipped to do so. Many students have received devices that function poorly, shutting down often and requiring lengthy restart times. Many students do not have high speed internet, affecting their ability to access digital platforms and information. Students are also struggling with the demands of remote instruction while often concurrently addressing other responsibilities such as attending to younger siblings while parents are at work.

The National Council of Teachers of Mathematics (2014) and others (Dolan, 2016; Puigjaner 2016) emphasize that the digital divide refers not only to access to digital resources but also to how those digital resources are used to support learning. In response, we developed a professional learning course for teachers to address the issue of how digital resources can be used to support engagement and collaboration in online contexts. After implementing this course with three cohorts of teachers across New York State, we have observed that many teachers remain unfamiliar with and even unaware of the most useful instructional features of the digital tools available. As a result, teachers continue to struggle to deliver instruction in a way that removes barriers to equitable teaching and learning in an online setting.



We believe that due to the convergence of all these factors, the inequities in educational opportunities have become more pronounced during the pandemic. High-stakes state assessments and school accountability processes, it seems, will only highlight opportunity gaps in learning that are beyond the control of students and teachers. The results of these assessments will not provide an understanding of the needs of each individual student and district, and therefore, accountability processes will lack validity. As we move forward, academic, social, and emotional needs, will best be formatively assessed by individual teachers and other professionals. We believe that instructional time that might be spent preparing and administering state assessments would be better spent on creating more opportunities for learning and time for attending to student social and emotional needs. Finally, eliminating the state assessment requirements and school accountability processes will also remove the possibility that assessment results will be misused and serve as a gatekeeper to progress for individual students and districts. For the above mentioned reasons, we are in support of the draft waiver requests to Philip Rosenfelt, the acting Secretary of Education at the U.S. Department of Education, in regards to assessment requirements and school accountability processes.

#### References:

Dolan, Jennifer E. 2016. “Splicing the Divide: A Review of Research on the Evolving Digital Divide among K–12 Students.” *Journal of Research on Technology in Education* 48 (1): 16–37.

National Council of Teachers of Mathematics (NCTM). 2014. *Access and Equity in Mathematics Education: A Position of the National Council of Teachers of Mathematics*. Reston, VA: NCTM.

Puigjaner, Ramon. 2016. “Progressing toward Digital Equity.” In *Promoting Human Development and Protecting the Environment: 6th IFIP World Information Technology Forum (WITFOR)*, San Jose, Costa Rica, September 12-14, 2016, pp. 109-20.

Sincerely,

The Mathematics Education Outreach Team

Genie Foster, Associate Director of Mathematics Education Outreach

Cynthia Callard, Executive Director of the Center for Professional Development and Education Reform

Jennifer Kruger, Associate Director of Mathematics Education Outreach

Melissa Staloff, Associate Director of Mathematics Education Outreach

Stephanie Martin, Director of Mathematics Education Outreach



## THE NEW YORK EQUITY COALITION



The Honorable Lester W. Young, Jr.  
Chancellor  
Board of Regents  
New York State Education Building  
89 Washington Avenue  
Albany, NY 12234

The Honorable Betty A. Rosa  
Interim-Commissioner of Education  
and President of the University of the State of New York  
New York State Education Building  
89 Washington Avenue  
Albany, NY 12234

Dear Chancellor Young and Commissioner Rosa:

We share your and the Board of Regents' view that the disproportionate reliance on remote learning for students who were underserved even *before* the pandemic and the significant inconsistencies in access to resources *during* the pandemic have exacerbated pre-existing inequities in our school system. Given these unprecedented circumstances, we support New York State Education Department's (NYSED's) decision to seek a waiver for the accountability requirements in Sections 1111(c)(4) and 1111(d)(2)(C)(D) of the Every Student Succeeds Act (ESSA).

The waiver NYSED has shared for public comment specifies that, "In 2020-21, NYSED has enhanced its data collection by adding student-level attendance data for both in person and remote instructional settings, as well as school-level collections focused on device and connectivity. Additionally, NYSED will continue to require LEAs to report on student achievement..." However, the waiver does not specify how and when all of these data elements will be made publicly available to students, parents, families, communities, and other stakeholders. We strongly urge NYSED to include specific steps in the waiver that outline NYSED's plan for public dissemination of this information in a timely manner and that it be made available in multiple languages.

As an alternative to formally identifying schools for "targeted support and improvement" or "comprehensive support and improvement" under the state's accountability system, we recommend that the state create an early warning watch list to provide support to schools that would otherwise be newly identified — while continuing to provide support to schools that were previously identified before the pandemic. Specifically, the state assessment results — alongside measures of college and career



readiness, chronic absenteeism, and other indicators — should be used to target funding and technical support to the schools with the greatest needs. The valuable information that can come from state assessments should be connected to resource allocation decisions that can better and more equitably serve students, providing additional support for students outside of regular instruction such as through tutoring and extended learning time.

State assessment data is vital to understand student learning and is especially vital this year as we work to measure, understand and address the real academic impacts of the pandemic – and how they differ across districts, schools, and student groups. The results of these summative assessments are essential to designing a path forward for New York State. It's also key to fulfilling our education system's fundamental responsibility to provide families with consistent, accurate information about whether their children are making progress towards meeting state academic standards – which parents indicated in a recent Education Trust–New York poll is more important than ever.

However, in the event that the federal government grants the waiver for state assessments, we would also like to draw your attention to four issues that should be included in the waiver to ensure the state leaders, education leaders, district leaders, school leaders, educators, communities, families, and parents understand what our students know, whether or not students are prepared for the next grade level, and equip educators with data that will help support students.

- **Measure student progress** – The state should provide school districts with specific guidelines for measuring student progress and mastery of state standards this spring and next fall. Specifically, the state should provide guidance on an approach that would allow apples-to-apples comparisons across districts, schools, and student groups. Otherwise, eliminating state assessments will only make widening opportunity gaps harder to identify and address.
- **Commit to Transparency** – The state should commit to publicly reporting the results of any approach used to measure student progress to parents, families and the public. This information should be available at the school, district, and state levels as quickly as possible, including disaggregated data for all student groups including by race/ethnicity, income status, English learner status, disability status, and housing status. The state should also publicly release data broken out by whether students were learning remotely, in-person, or in a blended setting this year, and by whether they had access to sufficient technology devices and high-speed internet access. Transparency is essential in order to inform strategies for investment and support at the state, district, and school levels.
- **Create summer enrichment opportunities** – The state should support districts and schools in creating and implementing plans to offer academic and social-emotional support for all students during the summer months. Districts should use district-based assessments to target and prioritize supports and services for students who are in most need of them.
- **Plan for next academic year** – The state should support districts and schools to address the academic and social-emotional needs of the students and communities who were underserved before the pandemic and experienced disproportionate interrupted instruction as a result of school closures, including addressing how time – both the way the school day is structured and the use of extended learning time – and staff will be deployed to meet students' needs in the following school year.

Thank you for the opportunity to share our public comment on the two federal waivers. We look forward to future opportunities to build a more equitable education system and hope that the additional recommendations we have made can be considered as part of the waivers.

Sincerely,

Better Schools Better Neighborhoods  
Brooklyn YWCA  
Buffalo Urban League  
The Business Council of New York State  
Business Council of Westchester  
Capital Region Chamber  
Committee for Hispanic Children and Families  
Democrats for Education Reform-NY  
District-Parent Coordinating Council of Buffalo  
The Education Trust–New York  
Educators for Excellence  
EPIC-Every Person Influences Children  
Hispanic Federation  
ImmSchools  
INCLUDEnyc  
National Center for Learning Disabilities  
New York Urban League  
Open Buffalo  
Otsego County Chamber of Commerce  
Public Policy Institute of New York State  
Read Alliance  
Turnaround for Children  
UnidosUS  
United Way of New York City  
Urban League of Long Island  
Urban League of Rochester  
Urban League of Westchester County



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KEVIN S. CASEY

Executive Director

February 2021

Dear Interim Commissioner Rosa,

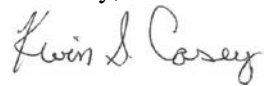
Thank you for the opportunity to comment on the New York State Education Department's application for waivers of assessment and accountability requirements of the 2020-21 school year, as specified in the submission to the USDOE. The School Administrators Association of New York State (SAANYS) expresses our strong support for the waivers on behalf of approximately 8,000 building administrators and program leaders across the state. At the start of the second half of this school year, we began receiving increased communications from our members expressing concerns regarding the state assessment program and other accountability requirements. For some members, particularly those who participated in the computer-based assessment field test, the concerns grew stronger. Our members were increasingly questioning the appropriateness of going forward with the state assessment program this year.

Concerns were based on instructional programming and the safety/health of their school community. Due to the COVID-19 pandemic, schools across the state have been met with challenges at every turn and as a result instructional programs have been uneven and inconsistent. The routine and flow of the instructional pacing has been interrupted by new health protocols, moving between different models of instruction, staff substitutions, length of transportation, quality of remote learning and overall disruptions in each day. Teachers and administrators have provided as much consistency and high quality of instruction as possible, but it would be difficult to compare the 2020-21 school year to any other. Further, our administrators became increasingly concerned for the health of their school community. They feel that bringing students and staff back into the schools to administer the assessments would unnecessarily increase exposure to the virus and that would not be prudent in light of the rollout of vaccinations and appearance of variant strains. Further, the requirement for in-school presence to take the exams would disrupt carefully established social distancing and likely increase the opt out rate of the exams. For all of the above reasons, SAANYS agrees with the SED position that it is in the best interest of the students and school community to request suspension of the state assessments used for accountability purposes for this school year.

SAANYS also supports the submission of the second waiver application regarding requirements for identifying accountability subgroups by assigning levels, based on the assessments. Our members have expressed concern regarding possible identification as a school needing "targeted or comprehensive" support and the submission of the second waiver moves in a direction that more fairly accounts for the many extenuating circumstances facing schools this school year.

Thank you for the opportunity to submit comments for your review and should you have any questions regarding our position, please do not hesitate to contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kevin D. Casey". The signature is written in a cursive, flowing style.

Kevin Casey  
Executive Director