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KEVIN S. CASEY

Executive Director

February 2021

Dear Interim Commissioner Rosa,

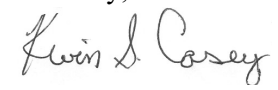
Thank you for the opportunity to comment on the New York State Education Department's application for waivers of assessment and accountability requirements of the 2020-21 school year, as specified in the submission to the USDOE. The School Administrators Association of New York State (SAANYS) expresses 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 black ink that reads "Kevin D. Casey". The signature is written in a cursive style with a large, prominent 'K' and 'C'.

Kevin Casey

Executive Director