



January 14, 2022

Melissa Siry
Office of Elementary and Secondary Education
400 Maryland Avenue, SW, Washington, DC 20202

Dear Ms. Siry:

Educators for Excellence and our National Teacher Leader Council—made up of 19 educators with nearly 200 years of teaching experience—appreciate the opportunity to provide public comment on the U.S. Department of Education's (ED's) [draft guidance](#), *Frequently Asked Questions Impact of COVID-19 on 2021-2022 Accountability Systems Required under the Elementary and Secondary Education Act of 1965 (ESEA)*.

As an organization that represents more than 33,000 educators across the country, we have an acute understanding of the immense and deleterious disruption the pandemic has had on student learning and mental health over the past two years. We also know that the students who are already most-impacted by systemic equity gaps have been hardest hit by COVID and its economic, educational, and mental health consequences. It is because educators have seen this damage firsthand that we understand how important it is to have strong, comparable data to identify the students and schools who most need support.

Conducting statewide summative assessments is an essential tool in supporting educational equity as students recover from the pandemic. Without assessments we cannot accurately gauge the extent of the interruption to learning and instruction and chart our future plans to fill in these critical gaps. **Therefore we strongly support the return to the statewide accountability measures required under the Every Student Succeeds Act. We also appreciate the flexibility ED has provided State Educational Authorities to adjust indicators and accountability in light of the continued pandemic.**

In Educators for Excellence's 2021 scientific, representative [survey of America's educators](#), nearly seventy percent of educators indicated their support for using assessments to identify which students and student groups need more resources and support, but only a minority thought that assessment data should be used to implement punitive measures for either students and teachers. Therefore we strongly suggest the U.S. Department of Education reiterate that states ensure:

- **Accountability measures are not used to punish educators or schools.** The challenges of operating schools during COVID are largely outside of educators' locus of control—including remote learning, trauma, and attendance issues. Thus, assessment scores do not accurately reflect school or educator performance and should not be used as performance measures.
- **Accountability leads to additional, targeted support for students, educators, and schools that need it most.** We believe that low-performing schools should receive additional funding—through the American Rescue Plan Elementary and Secondary School Emergency

Relief funds or other sources—and that interventions include sustained and research-informed academic and SEL supports, wraparound services, and professional development that is clear and relevant for districts, schools, parents, and educators.

We also strongly support ED’s guidance that any adjustments or implementation of accountability measures include authentic engagement with stakeholders, including students, parents, and educators. For example, our National Teacher Leader Council has indicated several key priorities including: further embedding assessments into curriculum, assuring assessments are culturally relevant, and ensuring the dissemination and accessibility of data to inform instruction. Going forward, it is essential that those who are closest to the work—students, parents, and educators—are meaningfully included in all decisions and changes in how assessments and accountability are administered and enforced.

After several years without comparable data, educators understand the importance of reimplementing the accountability required by the Elementary and Secondary Education Act and that utilizing these data will allow us to better support student learning and growth, but we also underscore that assessments are but one tool in providing an excellent and equitable education for our students. Finally, we would like to reiterate our belief that assessments should be used to drive equitable decision-making that supports students and schools and that the resulting data should not be used punitively. We look forward to working alongside states and districts to ensure that assessments and accountability contribute to an education system that uplifts all students.

Sincerely,

National Teacher Leader Council
Educators for Excellence