



BILL LEE
GOVERNOR

STATE OF TENNESSEE
DEPARTMENT OF EDUCATION
NINTH FLOOR, ANDREW JOHNSON TOWER
710 JAMES ROBERTSON PARKWAY
NASHVILLE, TN 37243-0375

LIZZETTE REYNOLDS
COMMISSIONER

Via Electronic Mail

June 12, 2024

Dr. Natalie Morosi, Executive Director
Aventura Community School
3010 Tuggle Avenue
Nashville, TN 37211

Re: Waiver for English as a Second Language (ESL) Programs

Dear Dr. Morosi:

I am in receipt of your waiver request of State Board of Education Rule 0520-01-19 as it relates to English as a Second Language (ESL) programs. You have requested to use an alternative co-teaching model for grades K-5 classes. According to your request, use of this co-teaching model will allow teachers to better integrate language instruction for students receiving ESL services and allow these students to remain in their respective classrooms.

Tenn. Code Ann. § 49-1-201(d) grants the commissioner the authority to “waive any state board rule or statute that inhibits or hinders the LEA’s ability to meet its goals or comply with its mission.” On the condition that the school district comply with the provisions of State Board of Education Rule 0520-01-19 by implementing the monitoring steps and requirements under the Rule, your request is hereby granted for the 2024-25 school year.

Please do not hesitate to contact me if you have further questions.

Sincerely,

Lizzette Reynolds
Commissioner

AVENTURA COMMUNITY SCHOOL

Dear Commissioner Reynolds,

My name is Katie Castellon and I am the Lower School Director (and ESL Coordinator) at Aventura Community School. I am writing to request the use of a co-teaching ESL model in our Kindergarten through 3rd grade classes for the 2024-25 school year, beginning August 5th 2024. We are a single-site charter and are only requesting this permission for ourselves.

Aventura is a dual language (Spanish/English) project based learning charter school located in Southeast Nashville. Our student population is linguistically, racially, and socio-economically diverse. We have about half of our student population who identify as native English speakers and half who do not. We are approximately 30% caucasian, 40% hispanic, 15% African American, 5% Asian and 10% mixed-race. We have approximately 100 students (estimation with incoming Kindergarten students still being identified) who will be identified as Active EL learners for the 2024-25 school year.

All of our classrooms are co-taught by two fully licensed educators, of whom are at least one licensed EL teacher per grade level (1 in Kinder, 3 in First grade, 2 in Second grade, and one in Third grade). This ratio of EL teachers is nearly double the state requirement due to the nature of our dual-language model where *all* students are considered language learners (learning English, Spanish or both). Embedding second language acquisition strategies is a daily part of our instruction for all students. Some example of these structures and strategies are:

- dedicated time in our scope and sequence for bridging of content (between Spanish and English) for all students
- using total physical response when engaging with a student in their non-native language
- word walls for both languages and cognates
- Center-based independent work time with manipulatives for both literacy and math
- Flexible work cycles that allow for daily adaptation to student needs and data in intentional small groups
- A project-based model that encourages students to collaborate and work together and build on each others linguistic and cultural backgrounds

A co-teaching model is essential to the implementation of our program and success of our students because it enables teachers to integrate content and language instruction seamlessly throughout the day and hold time during both literacy and math for small group instruction without pulling students out of the classroom. Our academic model is structured around two work cycles (literacy and math) during which teachers are implementing a variety of co-teaching strategies to meet the needs of each student in the classroom. This may include, but is not limited to, parallel or team teaching a lesson launch to ensure students are receiving new

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content in their zone of proximal development or station teaching during independent work time to reinforce literacy or math skills.

We understand that for co-teaching to be effective it requires extensive co-planning, coaching and professional development. We ensure teachers have over 2 weeks of training and co-planning time prior to the start of classes as well an hour of co-planning each day (see attached schedule). This includes weekly facilitated Team Planning meetings (run by our Lower School Director or Student Support Coordinator) to review upcoming lessons, monitor integration of language standards using the Standards Crosswalk, and analyze student data & progress.

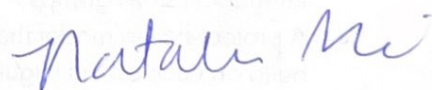
Research shows several examples of significantly increased achievement scores (Causton-Theoharis and Theoharis, 2008; York-Barr, Ghere, and Sommers, 2007) from collaborative/co-teaching inclusion models over a pull-out or sheltered approach. In addition, several districts and states across the country are moving to co-teaching as the backbone of their English acquisition strategies. For example, in New York State all ENL classes (English as a New Language) are taught by an educator who is dually certified (content area/ENL) or are co-taught by a certified ENL teacher. We understand it was removed as an approved program in Tennessee because it was not being carried out intentionally in all settings, but believe that when carried out with fidelity and intentionality it is the best way to meet the needs of our ELL students in a dual-language program.

As you can see in the evidence outlined above, co-teaching is a foundation of our school model and built into our teacher training, daily schedule, and instructional practices. We request that you allow us to build on this backbone of our model to support our English language learners instead of one of the other pre-approved models from the State Rule. We appreciate your time and consideration for our request.

Sincerely,



Katie Castellon
Lower School Director & ESL Coordinator



Dr. Natalie Morosi
Executive Director

Attachment A: Work Cycle Description

Lower School Work Cycles: Aventura incorporates several methods of instruction throughout the day that are beneficial not just for our ELL students but for all students. These include daily whole group, small group, and individual instruction guided by our curriculum & state standards. Co-Teachers provide support and interventions to address needs as indicated by academic benchmarks, ILPs and IEPs. In each work cycle in the ACS Lower School an observer could expect to see the following instructional elements:

- Launch: The work cycle Launch is a whole group activity led by one or both Co-Teachers and may involve an interactive read aloud, introduction of a mathematics performance task, or a lesson on how to use a set of classroom materials in tackling a component of one of our multidisciplinary projects. During this part of the lesson co-teaching is often either team teaching, parallel teaching or one teach one drift.
- Independent Work: Following the Launch, all students proceed to Independent Work time where they progress through a daily plan of learning activities during that work cycle. Independent Work is monitored and guided as needed by one of the classroom Co-Teachers, completed through station-teaching or one-teach one drift.
- Focused Instruction: During Independent Work, students will be called for individual or small-group Focused Instruction in Math or Literacy with the Co-Teacher who is not guiding Independent Work (as the year progresses and routines are established, eventually both co-teachers are pulling small groups simultaneously). These sessions are 10-30 minutes in length, allowing for approximately 4-8 Focused Instruction lessons per day in each extended work cycle. Based on the strengths of Co-Teachers, they designate who will lead Focused Instruction sessions in particular subject areas or to meet particular student needs. For our EL students these small-group sessions are 30 minutes of direct small group instruction and 30 minutes of whole group instruction from a licensed EL educator.

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Attachment B: Daily Teacher Schedule

2024-25 Schedules				
	Kinder	First	Second	Third
7:00 - 7:55	Before Care	Before Care	Before Care	Before Care
8:00 - 8:15	Arrival/MW	Arrival/MW	Arrival/MW	Arrival/MW
8:15 - 8:30	Morning Meeting	Morning Meeting	Morning Meeting	Morning Meeting
8:30 - 8:45	Morning Meeting	Morning Meeting	Morning Meeting	Morning Meeting
8:45 - 9:00	Math Lesson	Dictado		
9:00 - 9:15		EL Lesson		
9:15 - 9:30				Enrichment 8:45 - 9:45
9:30 - 9:45			Block 1 8:45 - 9:55	Block 1
9:45 - 10:00	Math Centers	Literacy Centers & Small Groups <i>*Direct ESL services provided*</i>		Compass Block 2
10:00 - 10:15				Block 3
10:15 - 10:30	Compass		Enrichment 9:55 - 10:55	
10:30 - 10:45	Recess 10:35 - 11:00			
10:45 - 11:00				
11:00 - 11:15				Block 1
11:15 - 11:30	Kindergarten lunch 11:00 - 11:25	Recess 11:00 - 11:25	Compass & Block 1 clean up 11:00 - 11:30	
11:30 - 11:45	EL Lesson & Dictado	1st Lunch 11:28 - 11:53	Recess 11:30 - 11:55	
11:45 - 12:00				Block 1 Clean Up
12:00 - 12:15	<i>*Direct ESL services provided*</i>	Compass 11:55 - 12:10	2nd lunch 11:55 - 12:20	Recess 11:55 - 12:20
12:15 - 12:30	Recess 12:20 - 12:45	Enrichment 12:10 - 1:10		
12:30 - 12:45			Block 2 12:25 - 1:40	3rd lunch 12:23 - 12:48
12:45 - 1:00	Read Aloud & Transition			12:48 - 1:13 Recess
1:00 - 1:15				
1:15 - 1:30		Recess 1:10 - 1:35		
1:30 - 1:45	Enrichment 1:15 - 2:15		Recess 1:40 - 2:00	
1:45 - 2:00				
2:00 - 2:15				
2:15 - 2:30		Math Lesson & Math Centers 1:40 - 3:15	Block 3 2:00 - 3:15	Block 2
2:30 - 2:45	EL Centers			
2:45 - 3:00				
3:00 - 3:15				
3:15 - 3:30	Clean Up	Clean Up	Clean Up	Clean Up
3:30 - 3:45	Dismissal	Dismissal	Dismissal	Dismissal

	Second Grade	Third Grade
Block 1	EL Lesson	EL Lesson & Small Groups <i>*Direct ESL services provided*</i>
Block 2	Small Groups & Centers <i>*Direct ESL services provided*</i>	Math Lesson & Centers
Block 3	Math Lesson & Centers	

MW = Morning Work
EL Lesson = Expeditionary Learning Lesson

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References:

Causton-Theoharis, J., & Theoharis, G. (September 2008). Creating inclusive schools for all students. *The School Administrator*, pp. 24–30.

York-Barr, J., Ghere, G., & Sommerness, J. (2007). Collaborative teaching to increase ELL student learning: A three-year urban elementary case study. *Journal of Education for Students Placed at Risk*, 12, 301-335.



Tennessee Department of Education – Office of The Commissioner
710 James Robertson Parkway - Andrew Johnson Tower, 9th Floor - Nashville, TN 37243

Local Education Agency Waiver Request

Pursuant to Tennessee Code Annotated § 49-1-201(d), upon application by the local education agency (LEA) for one or more of its schools, the commissioner of education may waive any state board rule or statute that inhibits or hinders the LEA's ability to meet its goals or comply with its mission. Please submit completed forms to Commissioner.Education@tn.gov. Following review by the commissioner, the LEA will be notified in writing if the waiver request is approved or denied. Unless otherwise stated, all waivers granted by the commissioner shall be granted for one-year terms.

Waivers may **not** be granted by the commissioner for regulatory or statutory requirements related to:

- (A) Federal and state civil rights;
- (B) Federal, state and local health and safety;
- (C) Federal and state public records;
- (D) Immunizations;
- (E) Possession of weapons on school grounds;
- (F) Background checks and fingerprinting of personnel;
- (G) Federal and state special education services;
- (H) Student due process;
- (I) Parental rights;
- (J) Federal and state student assessment and accountability;
- (K) Open meetings;
- (L) Educators' due process rights;
- (M) Reductions in teachers' salaries;
- (N) Employee rights, salaries and benefits; and
- (O) Licensure of employees.

Local Education Agency:

MNPS

School Information (if applicable):

School Name:

Aventura Community School

Street:

3010 Tuggle Ave

City:

Nashville

Zip Code:

37211

Please list the statute(s) and/or state board rule(s) for which waiver is being requested:

English as a Second Language Rule, Chapter

0520-01-19

Explanation of how the statute(s) and/or state board rule(s) inhibits or hinders the local education agency's ability to meet its goals or comply with its mission:

As a dual-language school with co-teaching already in each classroom, providing opportunities for students to engage with linguistic diversity within the classroom is essential to our model. Allowing ESL licensed co-teachers to provide co-teaching services without pulling students out of the classroom demonstrates that all students at Aventura are language learners regardless if they are receiving support for Spanish or English.

Expected duration of the condition necessitating this waiver request:

2024-2025 school year

(and continually for our K-5 classrooms)

Director of Schools (Signature)

Natalie Morsi

Print Name Natalie Morsi

Date 6-4-2024