



BILL LEE
GOVERNOR

STATE OF TENNESSEE
DEPARTMENT OF EDUCATION
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NASHVILLE, TN 37243-0375

LIZZETTE REYNOLDS
COMMISSIONER

Via Electronic Mail

August 21, 2023

Tutional Williams, Interim Director of Schools
cc: Carol Richardson, Executive Director (ESL)
Memphis-Shelby County Schools
160 S Hollywood
Memphis, TN 38112

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

Dear Director Williams:

I am in receipt of your July 20, 2023 waiver request of State Board of Education Rule 0520-01-19 as it relates to the use of an alternate English as a Second Language (ESL) service model. You have requested to use a co-teaching model for ESL programs for students in grades 6-12 (with the possible addition of students in grades K-5) as determined by enrollment and student needs.

This alternative model will include classroom walkthroughs in all classes using the alternative ESL co-teaching model as well as monitoring and evaluating the implementation of the program.

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.” Therefore, your request is hereby granted for the 2023-24 school year.

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

Sincerely,

Lizzette Reynolds
Commissioner



DEPARTMENT OF ENGLISH AS A SECOND LANGUAGE

920 N. Highland St. • Memphis, TN 38122 • Office (901) 416- 5727 • Fax (901) 416-7628 • scsk12.org/esl/

Carol Richardson
Executive Director
richardsoncr@scsk12.org

July 20, 2023

Tennessee Department of Education

ATTN: Commissioner Lizzette Gonzalez-Reynolds

RE: Request for Alternate ESL Program Service Model

Greetings, Commissioner Reynolds.

This letter is to request the use of an ESL service model not listed in Chapter 0520-01-19 of the State Board of Education Rules, English as a Second Language Programs (ESL) for Memphis-Shelby County Schools. Please see the details of the service model waiver request below.

1. LEA ESL Director or Coordinator Name:

Carol Richardson

2. Name of the Alternate ESL Model:

Co-Teaching / Push-In

3. Number of schools that will implement the ESL Model:

We estimate that around 60 of our schools will implement the co-teaching model, as will be determined by enrollment and student needs.

4. Grade levels that will implement the ESL model:

6-12, with the possible addition of K-5, as will be determined by enrollment and student needs.

5. Proposed implementation date:

This model would be utilized in AY23-24, which begins on August 7, 2023.

6. Proposed monitoring plan of new model:

On a quarterly basis, dedicated ESL Instructional Advisors (IAs) assigned to schools will participate in classroom walkthroughs in all classrooms utilizing the ESL Co-Teaching Model. Advisors will utilize a walkthrough tool to monitor and evaluate the implementation. The ESL Office has contracted with Dr. Joan Lachance who will be assisting in the development of a walkthrough tool. Specific look-fors will include, but are not limited to evidence of co-planning, use of a research-based co-teaching model, alignment of WIDA ELD Standards with the TN Content Standards, and integration of language/literacy teaching with content delivery.

Dr. Joan Lachance will facilitate training for ESL and content area co-teaching teams, as well as long-term implementation support training for the ESL Central Office team, which includes IAs and peer coaches. The ESL Central Office team will provide ongoing professional development and instructional support to co-teaching teams throughout the academic year.

All classrooms in the district serving ELs, including those utilizing the co-teaching model, are required to provide linguistic scaffolds and incorporate ELD standards in their instructional practices and assessments.

All teachers in the district will receive training on WIDA ELD standards through mandatory training. All ESL teachers, including all co-teaching ESL teachers, will receive direct instructional support from the ESL Central Office team.

Shelby County Schools offers educational and employment opportunities without regard to race, color, religion, sex, creed, age, disability, national origin, or genetic information.



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We will also be monitoring the effectiveness of the model using the following metrics:

- ILP Data – ELPA assessment, achievement assessments, relevant benchmark data, universal reading screener data (K-8), TCAP data (4-8), and career-readiness data (9-12)
- Student achievement data on district common formative assessments

If a co-teaching team is struggling to provide students with effective instruction for ELs, our department will implement a progressive system of support to improve co-teaching practices, which will include strategic, direct support with both co-teaching partners. Ultimately, if these supports do not improve instructional outcomes for students, then consideration of another approved instructional model will be recommended.

7. Short Description of the ESL Model being requested that includes evidence base of success from research that supports linguistic, and academic needs of English learners:

Co-teaching is an instructional model for ESL service delivery that ensures “that language and literacy skills develop while students participate in an equitable learning environment with full access to grade-level opportunities” (Nordmeyer et al. 2020). As described by Friend and Cook (2016), “co-teaching involved two or more certified [teachers] who... share instructional responsibility for a single group of students... with mutual ownership, pooled resources and joint accountability.”

Co-teaching and collaboration between content teachers and ESL teachers have demonstrated improved learning outcomes and engagement for all students, and for ELs in particular (Greenberg Motamedi et al., 2019; Theoharis & O’Toole 2011). In one study by Jackson and Bruegmann, it was determined that student math and reading scores increased by 0.8 and 0.6 percent of a standard deviation respectively when a teacher has peer learning opportunities (2009). Positioning ESL teachers as expert collaborators and facilitating the co-planning relationship is essential: “schools that have instructional teams engaged in better collaboration also have higher achievement gains in both math and reading... instructional collaborations have positive effects on students’ achievement gains” (Ronfeldt et al. 2015). Co-teaching is an effective model for addressing academic deficits for English Learners, particularly for LTELs as it allows for the simultaneous delivery of content and language instruction. Studies have determined “that integrated approaches to LTEL instruction are the most successful when teachers develop and/or implement interventions that combine English language and content-area instruction” (Hanover 2017). Additionally, it is recommended to heterogeneously group students such that ELs interact with their native English-speaking peers (Hanover 2017). Furthermore, best practices for LTELs include “placement of LTEL students in heterogenous and rigorous grade-level content classes alongside English-proficient students” and integration of “oral and written English language instruction into content-area teaching” (West Ed 2016).

This research supports a move to co-teaching so that ELs are placed in classes with native English-speaking peers, and those classes are intentionally planned and structured to concurrently support English language and content-area instruction.

ESL and Title III Director Signature Carl Richardson

Federal Programs Director or Director of Schools Signature [Signature]