



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

May 20, 2026

Boone Parlow, Director of Schools
Bell City School District
4547 HWY 88 South
Bells, TN 38006
BooneParlow@BellsCitySchools.org

Dear Director Parlow:

I am in receipt of your waiver request of State Board of Education Rule 0520-01-19 as it relates to staffing ratios for English as a Second Language (ESL) programs. You have requested to use an alternative staffing ratio at Bells Elementary School due to a shortage and an increase in the English Learner student population impacting your district.

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 required under the Rule as well as implementing the additional action steps to address the shortage and an increase in the English Learner student population impacting your district. outlined in your waiver request, your request is hereby granted for the remainder of the 2025-26 school year.

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

Sincerely,

Lizzette Reynolds
Commissioner

General Waiver Request

Local education agencies (LEAs) and public charter schools should review the Local Education Agency and Public Charter School Waiver Guidance posted on the [department's website](#) before submitting this request. The guidance outlines what can and cannot be waived, as well as the information required for commonly requested waivers.

To apply for a waiver, email the completed form to Education.Waivers@tn.gov. Following review by the commissioner, the requestor 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.

If this is a waiver request for a public charter school, please attach documentation that confirms the public charter school first submitted this waiver to its LEA authorizer and the LEA authorized denied the request.

Bells City School District Local Education Agency/Public Charter School

Bells Elementary School School Name, if applicable

4547 HWY 88 SOUTH BELLS, TN 38006 School Address, if applicable

BooneParlow@Bellscityschool.org Director of Schools/Head of School Email Address

Boone Parlow Director of Schools/Head of School Printed Name

Wayne Boone Parlow Jr. 1-12-26
Director of Schools/Head of School Signature & Date

1. Statute(s) or State Board of Education (SBE) rule(s) for which a waiver is being requested.

[Tennessee State Board Rule 0520-01-19-05](#)

2. Expected duration of the condition necessitating this request. Please note that the department will not grant waivers beyond one year.

January 2026-August 2026

3. Explanation of how the statute(s) or SBE rule(s) inhibits or hinders the LEA's/public charter school's ability to meet its goals or comply with its mission (attach additional pages if more space is needed).

Bells City School District consists of one Prek-5 elementary school and is located in rural West Tennessee. Historically, we have been able to operate with one full time English Language educator and remain within the state's 35:1 student-teacher ratio. However, this school year, we have had 15 new English Language Learners enroll, creating a ratio of 39:1; four students over the state board requirement.

Even though Bells City School District is operating four students above ratio, below are rationales for waiver to this state board policy in our specific situation:

- **Every EL student is receiving their required service hours during the student's school day. See EL Teacher and EL Individual Student Schedules in email attachments.**
- **Our EL teacher is still able to have her required planning time and lunch time, eliminating the need for additional compensation for time after school hours.**
- **Even with the ability to fit all requirements into the school day for both our ELLs and teacher, Bells City School District has chosen to stipend our EL educator at a rate of \$1,000 per semester for teaching four students over the required ratio.**
- **EL students in grades k-5 are making progress in reading and in math, according to our fall to winter Universal Reading Screening scores (see section III)**
- **Bells Elementary School is a level 5 school for 2024-2025. Hispanic subgroup (100% of our ELs are hispanic) is a level 5 for 2024-2025. English Learners with T1-T4 subgroup are level 5. (see email attachments)**
- **Bells City School is not an ATSI school for any subgroup, including EL subgroup. We are a reward school.**