A.3 PROGRAM OF INSTRUCTION

The Western Institute's dual goals of academic excellence and leadership development lend themselves to a project-based, constructivist approach, as modeled by High Tech High schools in San Diego, CA and others successfully working with an urban population (Coalition for Essential Schools, Center for Youth Program Quality, Farr, 2010). This approach begins with alignment of instruction to Arizona content standards in all subject areas. Then, teachers design project assignments are designed to *contextualize standards-based instruction.*

Much class time will be devoted to direct, scaffolded instruction based on specific Performance Objectives, delineated in the Arizona content standards, including targeted practice and assessments. The purpose of a concurrent project is not to replace direct instruction, but to augment it by providing an immediate "real-world" context where those skills are *necessary* and where they can be immediately integrated and applied. Each step of a project yields performances and products that can be evaluated and revised as skills are honed. The exhibition of the resulting "beautiful work" is a worthy outcome that motivates student engagement, effort, and achievement. Entering freshman at the Western Institute will begin with small, short-term projects, while seniors spend a full year on their Senior Project. All grade levels participate in semester-long projects that culminate in public exhibitions of student work.

Professional Learning Community

This approach requires a high degree of collaboration among highly qualified teachers that demonstrate a passion for their subject area, eagerness to collaborate in designing project-based learning, and the ability to ignite students' curiosity and joy in learning. Based on research by DuFour, Eakers, and others, the Western Institute will employ a learning community model to support exemplary curriculum design and delivery. WILD's principal, a consulting curriculum specialist, and several master teachers will comprise an Instructional Leadership Team (LT) that will 1) develop policy for curriculum development, delivery, and teacher evaluation, 2) regularly review teachers' written lesson plans for alignment with state standards and overall effectiveness, 3) visit classrooms often to observe teachers' performance, 4) provide feedback to improve teachers' performance, 5) conduct regular professional development for all teachers and ensure that teachers learn about current research and best practices, 6) ensure that curriculum development is data-driven, and 7) review the curriculum with teachers each semester to continually improve the quality of instruction (see details in the attached Performance Management Plans for Reading and Mathematics).

A culture of collaboration will promote creation of skill-based lessons that are logically and functionally appropriate within a project framework. For example, discrete lessons on statistics and expository writing will jointly give students the tools they need to develop and implement a reliable and valid survey on an issue relevant to them, then analyze and report on the data they collected. Assessment for statistics mastery may effectively include quizzes and tests as well as presentations, performances, and portfolios.

Project-based curriculum design

An effective interdisciplinary unit aligns with AZ academic content standards in both content areas. Pairs of teachers at the same grade level bring the lens of different subjects to address big

research questions and create projects that address real-world problems of interest to students and the community. Each teacher pair co-creates one major interdisciplinary project each semester that lends itself to student research, interaction with professionals in the community, and a public exhibition of the work. This establishes a culture of dialogue that enriches student work and indicates that the quality of their work matters to the community.

Overview of Project Design Process:

1. Teachers in each subject create a standards map for the year. Teachers then identify their most important "power POs" for each quarter, semester, and the year. These indicate the instruction, practice, and assessments they will now seek to *contextualize* within a meaningful project in which students will integrate and apply their acquired skills.

2. Teachers at each grade level share their standards maps. Together, they brainstorm competencies, content, and approaches that might "interlock" during the year in order to drive an integrated unit or project. For example, a project may grow out of a research question that prompts a student survey that requires statistical analysis and graphing. The social studies and mathematics teachers then coordinate lessons to equip students with the knowledge and skills needed at each step of project execution.

3. Two (or three) teachers then agree on a project idea based on a generative theme or driving question as the focal point for a project that lends itself to research, opens students to multiple perspectives, is of interest to youth and professionals in the community, and can culminate in a public exhibition of student work. For example: *What does it mean to be an American?* Students study refugee and immigration patterns in the world, including Asian and Hispanic immigration to the U.S.; read related literary texts; survey several generations of immigrants in Tucson about their experiences, and create a public exhibition of varied perspectives of "Youth on the Border."

4. Each collaborating teacher can now plan backward from semester and quarter benchmarks to create lessons that will feed into and support the completion of the project. Not all lessons will feed into the project, and many lessons—in and outside of projects—will involve direct instruction, practice and conventional types of assessment including essays, quizzes, and tests.

5. Teachers continue to plan and schedule together as they deliver instruction.

Monitoring project-based instruction

The Western Institute has adapted the Project Design Rubric on the following page to guide the creation of assignments and the Instructional Leadership Team's monitoring of instruction.

Project Design Rubric for Teachers and PLC

	LACKS ESSENTIAL PBL DESIGN	NEEDS FURTHER DEVELOPMENT	INCORPORATES BEST PBL PRACTICES
Overall Idea **- Focused, in-depth, extended inquiry** **- Authenticity** **- Student voice & choice, independence**	– It is an activity or applied learning task, rather than an extended inquiry. – It is unfocused, not one coherent project. – The topic and/or DQ do not reflect authentic issues or challenges that concern students, their communities, and/or professionals. – Students are not given opportunities to express "voice & choice"—to make decisions affecting the content or conduct of the project; and/or – Students are expected to work too much on their own, without adequate guidance.	– Inquiry is superficial, e.g., information-gathering is the main task, or focus is too broad or narrow. – The topic & DQ do not completely reflect authentic issues or challenges and does not tie in to "real" work done in the field. – Students are given limited opportunities to express "voice & choice," generally with respect to less important matters. – Students are expected to work independently from the teacher to some extent, but have the skills and interest to do more on their own.	– Inquiry is academically rigorous: students pose questions, gather & interpret data, ask further questions, develop & evaluate solutions, build evidence for answers and express publicly. – The topic & DQ reflect authentic issues or challenges that concern students, their communities, and/or professionals in the field and have a real purpose beyond the classroom. – Students have opportunities to express "voice & choice" on important matters. – Students take significant responsibility, work independently, yet have full teacher support.
Duration	– Too short or too long to justify skill gains.	– Inaccurate estimates re how quickly some tasks can be done or too stretched-out.	– It is long enough to adequately answer the Driving Question & complete high-quality work, including time for revision and reflection.
Driving Question	– There is no DQ or it is seriously flawed. o It has a single or simple answer o It sounds too "academic", like it came from a textbook, and little relevance	– The DQ meets some criteria for an effective DQ, but lacks others, e.g., it may lead students toward one particular answer, or it may be hard to answer thoroughly with the resources & time available and/or by students in this class.	– The DQ captures the main focus of the project; leads students to develop more than one reasonable, complex answer; is understandable & inspiring to students; and requires students to gain standards-based knowledge and skills.
Interdisciplinary	– Inauthentic interdisciplinary work.	– Different content areas make simplistic and/or limited contributions to the overall project.	– Each content area makes substantive, standards-based, contributions to the project.
Outcomes	– Outcomes/POs are not specified or not aligned with state standards.	– Too few or too many outcomes addressed.	– Specified content outcomes are aligned with key state standards needed to complete the project.
21st Century Skills: - Collaboration - Presentation & Defense - Critical Thinking - Technology	– Ignores the development of 21st Century Skills or does not scaffold learning. – Students do all project tasks as individuals. – Students do not present or defend their culminating product(s). – Students are not asked to think critically or solve problems. – Technology use distracts from key POs.	– Targets too few, too many, or unimportant 21st Century Skills. – Students present in teams, but piece together the work of individuals. – Students present their culminating products, but defense is limited to superficial Q&A session. – Students analyze & solve problems and think critically, but not in depth or in a sustained way. – Technology that could improve the quality of student work is not included.	– Targets a limited number of 21st century skills to be taught & assessed. – Students work in collaborative teams that employ the skills of all group members. – Students have opportunities to collaborate with people beyond the classroom. – Students present their culminating products and defend them in detail & in depth, e.g. by explaining the reasoning behind choices they made, how they used an inquiry process, etc. – Students are asked to analyze & solve problems and think critically, in depth and in a sustained way. – Technology enhances the project in creative ways improve the quality of students' thinking.

Monitoring Standard-based Instruction
As detailed in the Performance Management Plans, teachers will plan and work together in the PLC and in discipline-specific and interdisciplinary teams to align AZ standards coverage within and across courses and grades. The Western Institute has the following accountability mechanisms in place to ensure that our teachers are covering state standards:

- Required teacher posting of syllabi showing year-long approach to meeting state standards
- Administrative observation in classrooms to verify that teachers are covering the content specified in their syllabi, and that student work reflects standards during Presentations of Learning (POLs), Exhibitions and other public displays of student work
- Regular PLC meetings where, in the context of discussing student work, teachers address how projects and assignments connect to standards
- Library of text books, primary source material, and other resources available to assist teachers in teaching to standards
- Annual review of teachers where coverage of standards and student growth measures aligned with standards are established criteria

Principles of delivering instruction:

- **Convey high expectations.** Teachers at the Western Institute work with students to set big, measurable, and meaningful goals for students—and then work together to achieve them. (Gates Foundation, Marzano, Wagner, Farr).
- **Provide a welcoming environment and reliable support.** The Western Institute is a physically and psychologically safe environment in which students can express themselves, ask questions, and give and receive needed help. Teacher-advisors support up to 15 student advisees in weekly one-on-one and group meetings, establishing a support team for each student. Academic coaches and tutoring provide academic support. Student-teacher-family portfolio reviews each semester invest students' support system in their progress, achievements, and provision of assistance where needed. Opportunities for group work and training in leadership and conflict resolution promote good relationships at this critical time in students' socio-emotional development (Goleman, Gardner, Eccles, Block, Search Institute).
- **Instill a learning mindset and self-motivation.** Based on brain and behavioral research, teachers—through specific means of framing tasks and providing evaluation—instill a learning mindset that fosters effort, joy in learning, and resilience after (temporary) failure (Dweck, 2006). Teachers promote individual and group reflection and evaluation, encouraging students to derive meaning from their actions and outcomes (Dewey, Bruner, Bandura).
- **Create highly dynamic classrooms.** Teachers challenge students with questions that spark lots of discussion and debate, requiring evidence and argumentation, and communication of information and opinions effectively and persuasively.
- **Integrate reading, writing, and 21st century communication skills across the curriculum**, including use of technology and media arts.
- **Personalize instruction and differentiate instruction within a core curriculum and common intellectual mission** (Marzano, Tomlinson, Wiggins and McTighe).
- **Promote 21st Century skills:** With minor reliance on textbooks, emphasis is placed on student research, use of technology, and the analysis and synthesis of information to provide a basis for effective decision-making and action. Students will gain expertise in expressing themselves effectively, whether in a report of research findings or a service learning project in the community. .

Program of Assessment:
Western Institute will administer baseline (beginning of year) and interim assessments aligned to state standards, receive an analysis of students' skill gaps if any, and design a program for that student that may include before-, during, or after-school tutoring and academic coaching. Lease of the Spiral Universe SAIS package will give Western Institute teachers access to AZ standards-aligned assessments, plus individual student-level growth charts as a basis for data-driven instruction. This data will facilitate teachers' rapid response to students' needs, including focused remediation for some and offering greater challenge and enrichment for others. We also plan to work with ALEKS Corporation to obtain estimates for their highly successful learning and assessment software that allows

students to go at their own pace and track their own progress. We will focus attention on the four key measures Dr. Rebecca Gau's report "Success Measured":

1. High level student-level growth percentile rank
2. Higher than expected student-level growth given student demographics
3. High actual-minus-predicted scores
4. Long term evidence of school-level growth relative to the state mean

Formative assessments will be frequent, specific, and embedded in lessons: examples: journal prompts, individual and collaborative board work on math problems or brainstorming ideas, quizzes, peer review of first draft essays and reports. Teachers will regularly ask guiding questions to prompt students to provide arguments and evidence for their answers. Teachers and peers will provide questions and feedback on a continuing basis. Teachers may select interim assessments for students using Spiral Universe and design appropriate remediation if necessary—when appropriate, in consultation with the special education director/coordinator.

Summative assessments: A range of unit, quarterly, semester, and yearly assessment will establish mastery of POs will be used at the Western Institute, including:

- Paper-pencil tests with selected responses, e.g. multiple choice and fill-in questions.
- Paper-Pencil tests with constructed responses, e.g. mathematical proofs, short essays.
- Written performance assessments, e.g. an essay, report, or opinion editorial
- Single- or multimedia performance assessments – e.g. oral presentations of research, original poetry and stories, art and media arts products, Web content, scripts, plays, etc.
- Semester-project exhibitions
- Quarterly and end-of-year reviews of students' digital portfolios
- Following the model of High Tech High, students will keep electronic portfolios in all of their academic courses that examples of the students' best effort and best work. Students will participate with the teacher in creating the criteria for assessing the portfolios. Portfolios will show student progress from the beginning of the year to the end, showcase the students' best work, provide a means for students to assess their learning and set goals for the following quarter, and provide evidence of the students' progress toward mastery of the course outcomes.

Example contents of a portfolio: paper/pencil tests, AIMS practice assessments, completed essays, lab reports, artwork, photos of completed or in-progress projects

See the following for the Western Institute's assessment rubric for use within the PLC.

Project Assessment Rubric for Teachers and PBL

Draft © Buck Institute for Education 2010 – Adapted November 2010

	Unacceptable	Needs Development	Best Practices
Formative Assessment	The project has no planned formative assessments to monitor student learning prior to submission of final products.	Assessments are not aligned with standards or not used often enough to identify and correct student problems.	Students are aware of POs, and have examples, and rubrics for the work. Assessments frequently monitor student learning in order to improve understanding & performance; constructive critiques help students revise and produce excellent work.
Summative Assessment	No summative assessments are planned, or do not measure individual student learning; e.g., all grades team-based. Expectations about the quality of work required are not communicated to students through examples and rubrics.	Summative assessment too broad or narrowly focused, do not cover essential POs. Expectations about the quality of work required are not clearly communicated to students, e.g., no examples and/or rubrics are unclear or incomplete.	– Summative assessments target all important content & skill outcomes. – Summative assessments focus on both individual learning and team-created products. – Expectations about the quality of work required are communicated to students through examples and rubrics of high quality. – Examples and rubrics are complete and of high quality.

Performance Assessment	– The major products are not aligned with state standards or Driving Question, i.e., they do not represent appropriate skill gains or solve a stated problem. – Students do not present or exhibit their work to an audience.	– Major/culminating products address the DQ, but do not align closely with standards or provide adequate evidence of learning. – Students create replications of others' work, e.g., reports of information only. – The teacher and/or class are the only audience for student work.	– Major/culminating products align with standards and give a well-defended answer to the DQ. – Major products require creation of something new—a written product, media or art work, analysis of information or synthesis of ideas. – Students present or exhibit their work to an audience of others within and outside the school, including online audiences.
Student Electronic Portfolios	– No record of student work is kept.	– Student portfolios serve no purpose, are incomplete, or merely "art" projects.	– Student portfolios are reviewed with parents, teacher and class. – Students select, collect, and present work that shows effort, progress, and achievement, e.g. first drafts & revisions as well as final products.

Standardized Testing
Western Institute will administer AIMS and all required standardized tests as mandated. In March, 2010, the State Board of Education approved subtest scores from the SAT and ACT for the purposes of satisfying AIMS high school graduation requirements provided a pupil in 12th grade has previously taken AIMS at each possible administration. We will ensure students take advantage of that option when necessary. We expect to successfully meet our AZ Learns requirements in the following manner: Performing in Year 1, Performing or Performing Plus in Year Two, Performing Plus in Year Three, and Excelling in fourth year and beyond.

Post-AIMS testing:
Because our goals for student achievement include critical thinking and problem-solving, we are exploring the possible administration of one of the following assessments in spring of senior year:

- CWRA – College and Work Readiness Assessment, targeting critical thinking, analytical reasoning, problem-solving, and writing.
- Collegiate Learning Assessment
- PISA - Program for International Student Assessment

Diagnostic Exams and Remediation
Newly enrolled students will take diagnostic exams in reading, writing, and mathematics; the Principal and teacher(s) will review their previous records and state-mandated testing results. New and returning students are pre-assessed for at least 70% mastery of the previous grade-level Performance Objectives, as set by AZ State Standards. Those students falling below that mark will begin immediate remediation; options include before, during, and/or after school instruction and/or focused practice individually or in small groups, as appropriate. .

As many as half of incoming students are expected to be somewhat below grade level in language arts and/or mathematics, and will need academic assistance to meet the demands of a full inclusion, single-track curriculum. Students that fall below 70% mastery of the previous year's grade level performance objectives defined by state standards—or whose previous records suggest that they are not ready to access the single-track curriculum at the 9th grade level—will be recommended for immediate remediation. Students that need remediation will be asked to commit to after-school tutoring and/or technology-based assistance on specific skills they are lacking. The Western Institute will employ several academic coaches/aides to assist students and provide support. Remediation may be provided individually or in groups, in-school and/or after-school, and both direct instruction and technology-based resources will be used as appropriate. As the school year progresses, students not meeting the standards will be identified through quarterly assessments and provided with academic assistance to address deficits.

Special Education and ELL:
Western Institute will comply with all state and federal mandates and provide eligible students with disabilities a free and appropriate education (FAPE) in the Least Restrictive Environment (LRE). Western Institute shall ensure a continuum of services to meet the needs of students with disabilities. Special education services to be provided for each student will be determined by the IEP team. The level of service will determine the LRE.

Students will be educated with their non-disabled peers in the single-track curriculum to the maximum extent possible. Accommodations, modifications, and/or adaptations will be made in the student's program as deemed appropriate for that student, and considerations will be made for the following areas: Assessment and Grading, Curricular and Instruction, Assignment, Learning and Organizational, and Behavioral Support/Environmental. Our goal in making these accommodations/modifications is that students shall have access to the general curriculum and the opportunity to demonstrate progress.

Students will be educated with their cohorts in classrooms as determined by the IEP team. Environmental adaptations will be made to assist students with special needs to experience optimal learning opportunities. For example, in the case of an Attention Deficit Hyperactive Disorder (ADHD) student, work space will be provided, if necessary, in which there are reduced environmental stimuli and/or distractions, noise, or "traffic" to assist the student to learn and complete tasks. Specialized furniture and/or tools will be considered if deemed beneficial by the IEP team.

To the extent possible, integration into individual and group project-based learning will help students maintain the motivation to learn and construct meaning from their learning experiences. Importantly, group projects provide opportunities for all students to work successfully with others of diverse backgrounds and skill sets. As determined by the IEP team, students with special needs will be involved in student projects and community service programs and will present exhibitions to the community upon completion those of projects.

The degree of involvement of a special education teacher will be determined by the IEP team. Some students may function well on a "consultative" model, where the special education and general education teachers will consult and collaborate regularly (at least on a weekly basis) to discuss the needs of the student(s) and plan accordingly. Some students may benefit from individualized and/or small group instruction (Resource Program). Students will be included in the general education classes as much as possible and appropriate, but pull-out will be considered if students are not progressing in the general classrooms, as determined by the IEP team. A more restrictive, special education self-contained classroom (Self-Contained Program) will be available to meet the needs of the students. Related services, such as Speech & Language Therapy, Occupational Therapy, and Physical Therapy will be considered and provided as needed and determined by the IEP team. If necessary, special needs students will be tuitioned-out to a different facility that has program(s) that Western Institute may not.

Western Institute will provide placement and services for those students in alternate settings, if determined that it is the best and appropriate placement for the student. The hospital/homebound model is used for children with disabilities who are enrolled in a special education program and have a medically diagnosed physical condition that restricts them to their home or a hospital for a period of time that will significantly interfere with their education. Western Institute will comply with amount of instructional time these students need and provide that instruction in their home. Western Institute staff will work closely with the student's medical doctor who shall project that the student will miss more than 10 consecutive days of school and will need to be instructed at home due to a medically diagnosed condition.

Screening:
Western Institute will not discriminate against any student based upon disability, and will accept incoming students with an IEP whose special needs have been predetermined. A 45-day screening will be conducted for all enrolled students, since our initial population will be relatively small. This screening will cover the following areas:

academics, communication, social/behavioral, psychomotor skills, vision & hearing, adaptive, and other considerations. It will state administrative actions taken, and note the primary language of the student.

If the screening indicates concerns, there will be a follow up by the special education coordinator. Families will be informed of these concerns within 10 days. A Child Study Team (CST) meeting will be conducted to discuss the concerns, student's strengths, weaknesses, and our plan. The team may brainstorm and come up with a list of interventions to try and the team can meet as often as is necessary. If a referral for an in-depth evaluation is requested and agreed upon, Western Institute will have the evaluation completed. Parents will be provided with Procedural Safeguards, explaining the special education process. If a student was referred for a complete psycho educational evaluation, it will be summarized in a Multidisciplinary Evaluation Team (MET) meeting, with all required members present. Consent will be obtained from parents to proceed with the evaluation. The MET will meet again after the evaluation report is competed, to determine eligibility. For qualified students appropriate documents (such as the Eligibility Form, Parental Consent for Initial Placement in Special Education, Prior Written Notice, and Meeting Notice) will be signed and completed and an IEP developed.

The level of service will determine the LRE. Any placement should be as close as possible to the student's home and is based on the student's IEP. All areas related to the student's disability will be addressed and documented in the IEP, including: 1) Documentation of Participation at IEP Meeting, 2) Statement of Transfer of Rights at the Age of Majority, 3) Present Levels of Academic Achievement & Functional Performance (PLAAFP), 4) Transition Services (Post Secondary Goals, Assessments, Courses of Study, Strengths/Interests/Preference, and Assessments, & any Other Educational Opportunities), 5) Measurable Annual Goal(s), 6) Statement of Services and Supports, 7) Non-Participation in Regular Class Activities, 8) Accommodations and Modifications for Instruction and Assessment, 8) Statement of Progress Toward Goals, 9) Additional Support For Students in a Private Residential Facility, and 10) Extended School Year Services.

Training and Resources: Contracted special education teacher(s) and professionals will collaborate with and train the general education teachers in methods that will promote success for special needs students while in the general education classes as appropriate. Western Institute will provide on-going professional development opportunities to educate our staff on meeting the needs of special needs students. Personnel will be trained and comply with all confidentiality requirements. For additional trainings, Western Institute will utilize available workshops, classes, and conferences through the Arizona Department of Education (ADE), and the SELECT classes. As need requires, Western Institute will employ one or more teachers with special education credential and/or certification, qualified to work with its diverse student body, including minority and low-income youth. It is important to Western Institute that each student receives an appropriate education supported by well-trained faculty and personnel.

Personnel and Duties: Western Institute will contract with a highly qualified special education director/coordinator, who will oversee and supervise all special education related activities, including meetings, completion of documents, communication with families, maintain training on current practices and policies, supervise special education teacher(s)/assistants, and collaborate and consult with general education teachers. Specific considerations include:

- The special education director will report to the school director/principal while on campus. Western Institute will remain in compliance with the federal law (PL94-142), IDEA 2004, and Section 504 law under Americans with Disabilities Act (ADA).
- Special education services and practices will comply with all state and federal regulations and requirements.
- Western Institute will train all staff and employees prior to start of the school year to discuss/train in confidentiality, Child Find, screenings, etc…
- Western Institute will employ and train paraprofessionals to assist qualified teachers as needed.
- Western Institute will be open to working with volunteers and or employed individuals to participate in classroom teaching to enhance and encourage community participation and involvement, as appropriate.
- Western Institute will contract services of those professionals not employed, including Speech & Language therapy, Occupational Therapy, and Physical Therapy, teacher for the Visually Impaired (VI), Counselor, and other specialist, as needed.

Western Institute policy for identifying English Language Learner (ELL) students:
In the Western Institute enrollment form, the enrolling parent or guardian is asked to fill out the Home Language Survey of the enrollment form, consisting of one question: What is the primary language of the student? If anything other than English is written in as an answer to this question, the student will be assessed to determine level of English proficiency. Western Institute will seek to find test history on a student transferring from another school, in case the Arizona English Language Learner Assessments (AZELLA) was administered previously.

For new students enrolling in Western Institute, the AZELLA is administered to students within 30 days of the beginning of the school year. The test is administered within a two-week period if a student enrolls during midyear. The AZELLA tests are mailed to Pearson Assessment Center where they are scored. Results (Rapid Reports) are mailed back to the school. If a student does not attain the "Proficient" level on the AZELLA, a Parent Notification and Consent form is given to parents. With parental consent, students are determined to be ELL.

Sema Kelly, the Western Institute's contracted Special Education director/coordinator is qualified to administer the AZELLA. Based on comparison schools in Tucson with a college preparatory focus (e.g. Academy of Tucson, Amerischools, Basis, City High, Presidio, and Sky Islands with zero ELL, and Sonoran Science with 1%), it is unlikely that the Western Institute will attract students classified as English Language Learners. In the event that there are up to 20 ELL students, we will ensure that each ELL student has in place an Individual Language Learner Plan (ILLP). All teachers will be trained in implementing the ILLP goals, Discrete Skills Inventory, and state ELL standards. If the school's ELL population were to grow to exceed 20, a separate classroom would be utilized to ensure that ELL students receive the mandated four hours of English Language Development (ELD).