

2023-24 Graduation Cohort Protocol

January 2024

Key Updates:

- District cohort contacts will receive emails when withdrawal documentation has been denied on the Cohort application. These emails are automatically generated. If you have any questions concerning why documentation was denied, please reach out to TNEducation.Graduates@tn.gov.
- The cohort process involves three distinct phases, and each phase requires district completion of various tasks. Districts shall follow the process and timeline as specified in [Table 2](#) for all three phases. The department will deny any documentation submitted after the due dates.
- During Phases I and II of the 2023-2024 Graduation Cohort Process, districts will also verify the TISA graduate roster, which includes students eligible for TISA High School Outcome Bonuses. For more information on the difference between the Graduation Cohort and TISA graduates, please consult [Section 3](#).

Please reach out to TNEducation.Graduates@tn.gov for all questions related to the Cohort process.

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Section 1: Overview

This document helps districts navigate the process of calculating, verifying, and reporting the federal and Tennessee graduation rates used for accountability. Accurately calculating the graduation rate in compliance with federal and state guidelines is a multi-step process that involves the collection and transformation of many points of data. Additionally, starting with the 2023-2024 Graduation Cohort Process, districts will also verify the roster of students eligible for TISA High School Outcome Goal 1 Bonuses. This document outlines the Graduation Cohort process timeline, withdrawal code guidance, and the specific steps districts should take at each stage of the process to finalize cohort and TISA roster data.

It is crucial for districts to be actively engaged in the cohort process, as the graduating cohort data will be utilized for evaluating the Graduation Rate and *Ready Graduate* indicators, as well as for calculating the ACT/SAT participation rate. Furthermore, the roster of students eligible for TISA High School Outcome Bonuses will be used in the awarding of TISA bonuses. Once the data are finalized by the end of the cohort process, data related to the graduating cohort and the TISA roster are final and can no longer be appealed. For more information on the difference between the Graduation Cohort and the roster of students eligible for TISA High School Outcomes bonuses, please consult [Section 3](#). Any questions about the 2023-24 Graduation Cohort process can be sent to TNEd.Graduates@tn.gov.

Section 2: Graduation Rate Guidelines

Federal law¹ requires students to be counted in graduation rate calculations based on the year in which they first entered grade 9. Graduation rates are calculated using the U.S. Department of Education's four-year adjusted cohort formula listed below, rounded to one decimal place.

$$\text{Graduation Rate} = \frac{\text{Number of students who graduated in four years plus a summer}}{\text{Number of students in graduating cohort}} \times 100$$

The *number of students who graduated in four years plus a summer* (# of graduates) is defined as the number of students who earn a regular diploma or an alternate academic diploma, including completion types 1, 8, 11, 12, or 13, within four years and a summer of entering grade 9 for the first time.

The *number of students in the graduating cohort* (# in graduating cohort) is defined as the number of students entering grade 9 for the first time four years prior, removing withdrawn students and adding students who join that cohort in later years. For example, a student transferring from an out-of-state school who enters grade 10 in a Tennessee public school for the first time in the fall of 2021 would be placed into the 2020 cohort and expected to graduate in spring 2024. Applying these definitions to the 2024 graduating cohort, the cohort includes students who entered grade 9 during the 2020-21 enrollment period. Graduates are students who completed high school with completion types 1, 8, 11, 12, or 13 by the end of summer 2024.

Since the 2022-23 school year, federal guidelines require the department to calculate the four-year graduation rate by only counting students as graduates if they graduate within four years and a summer after entering 9th grade and earn either a regular diploma with **all required coursework in all subject areas** or an alternate academic diploma (AAD). This means that students who receive a regular diploma while utilizing the exemptions from required coursework provided by [SBE Rule 0520-01-03-06-12-c](#) and [SBE Rule 0520-01-03-06-13-a](#) may not be counted in the graduation rate within the Graduation Rate indicator. In response to this requirement, the department will calculate and report two graduation rates for accountability purposes. First, the department will calculate the **federal graduation rate** following the federal guidelines. Second, the department will calculate the **Tennessee graduation rate** following the Tennessee State Board of Education (SBE) [High School Policy 2.103](#)². The distinction between the two is discussed below.

2.1. Federal Graduation Rate

When calculating the federal graduation rate, only students that complete **all required coursework in all subject areas** per the requirements of ESSA § 8101(25) and ESSA § 8101(43) will be included in the numerator of the federal graduation rate calculation. The [SBE's High School Policy 2.103](#) provides an alternative pathway for students with disabilities to earn a regular diploma without completing Algebra II

¹ ([ESEA section 8101\(25\)\(A\)\(i\); 34 C.F.R. § 200.34\(a\)\(2\)](#))

² Also see CHAPTER 0520-01-03-06

(or Integrated Math III) and Chemistry or Physics (courses normally required for all graduates). Per federal guidelines, students taking the alternative pathway cannot be counted as graduates in the federal graduation rate calculation.

This federal requirement regarding graduation rate calculations only affects calculations for federal reporting; it does not supersede the SBE's [High School Policy 2.103](#), which governs the awarding of regular diplomas to students with disabilities in Tennessee. Though they will not be counted as graduates in the federal graduation rate, students with disabilities will still be able to graduate high school while receiving a regular diploma using the alternative pathway.

Graduates as defined by the federal graduation rate will be used to calculate the graduation rate for schools and districts and to evaluate the Graduation Rate Indicator for federal accountability purposes. The federal graduation rate will also be used to identify Comprehensive Support and Improvement (CSI) schools and Additional Targeted Support and Improvement (ATSI) schools (i.e., any school with a graduation rate less than 67% is identified for CSI status; any school with a graduation rate less than 67% for a given student group is identified for ATSI status).

2.2. Tennessee Graduation Rate

The Tennessee graduation rate will be calculated in accordance with the SBE's [High School Policy 2.103](#). Students with disabilities who complete four years of English language arts (ELA) and math in extended courses (A/B courses) and those who received three credits of science in accordance with the [High School Policy 2.103](#) will continue to receive a regular diploma and be included in the numerator of the Tennessee graduation rate calculation. The graduates defined by the Tennessee graduation rate will be used to calculate the *Ready Graduate* rate³ and the ACT/SAT participation rate⁴ for federal accountability purposes.

2.3. Dropout Rates

Dropout rates reflect the number of dropouts divided by the number of students in the graduation cohort, rounded to one decimal place. Dropouts include students in the graduating cohort who:

- Have no completion type⁵ (see Completion Type in [Section 5.2](#)) and were not enrolled in a Tennessee public school as of Oct. 1 of the following school year after the anticipated graduation year of their cohort, **or**
- Have no completion data, and have withdrawal codes of 0, 1, 3, or 4 in the most recent enrollment of the following school year *after* the anticipated graduation year of their cohort.

2.4. Student Group Membership and Graduation Rate Reporting

Graduation rates are calculated for all student groups, including

³ Ready Graduate = number of students who graduated in four years plus a summer meeting Ready Graduate criteria / number of students in the graduating cohort*10

⁴ ACT participation rate equals the number of graduates with a **regular diploma** and a valid ACT/SAT score divided by the number of graduates with a regular diploma. The *Ready Graduate* rate is the number of graduates with *Ready Graduate* status divided by the number of students in the graduating cohort. For both rates, the graduates defined by the Tennessee graduate rate are used in the calculation.

⁵ This also includes students with completion type 5, as this completion type indicates students did not earn a completion document of any kind.

- All Students
- Black, Hispanic, and Native American Students (BHN)
- English Learners (EL)
- Economically Disadvantaged students (ED)
- Students with Disabilities (SWD)
- Hispanic/Latino
- Black or African American
- American Indian or Alaska Native
- Native Hawaiian or Pacific Islander
- Asian
- White

Student membership in certain student groups may change over time (e.g., ED, EL). When reporting on other indicators for school and district accountability by student group, students' most current membership in student groups during the reporting year is used. When reporting on graduation rate, a different method is applied. That is, once a student is identified in the historically underserved student group (i.e., BHN, EL, ED, SWD) during any of the high school years, the student will be assigned to that underserved student group for graduation rate reporting. For instance, if a student is assigned to ED in grade 10 but not in grade 9, 11, or 12, the students' graduation data is included in the calculation for the All Students group and ED group.⁶

⁶ The rules around student membership are currently in practice. This section is added to the protocol for information only.

Section 3: TISA Graduates Roster

Starting with the 2023-24 Graduation Cohort Process, districts will not only verify the roster of students included in the 2023-24 Graduation Cohort but will also verify the roster of TISA graduates (i.e., students eligible for 2024 TISA High School Outcome Goal 1 Bonuses). The roster of TISA graduates includes all students in the 2023-24 Graduating Class. While there is typically a great deal of overlap between the membership of a district’s Graduation Cohort and Graduating Class in any given year, these two groups are not the same. A graduation cohort includes all students that entered 9th grade four years prior to the year in question regardless of completion status, whereas a graduating class includes only students who received a regular or alternate academic diploma (AAD) in that year, regardless of their first year entering 9th grade. For a detailed overview of the differences between the 2023-24 Graduation Cohort and the 2023-24 Graduating Class, please consult Table 1 below.

Table 1. Graduating Cohort vs. Graduating Class

Graduating Cohort (2023-2024)	Graduating Class (2023-2024)
<ul style="list-style-type: none"> • Used in federal and state accountability • Includes all students that entered 9th grade in 2020-21, regardless of completion status by the summer of 2023-24 • Includes students who entered grade 9 in 2020-21 and graduated early (i.e., prior to 2023-24) • Only students with “P” in the enrollment status are included • Students enrolled at CTE schools, adult high schools, or closed schools may be included in the cohort depending on their prior enrollment. Consult Section 5.3 for more detail. 	<ul style="list-style-type: none"> • Used for calculating TISA outcomes • Includes all students who received a regular diploma or an alternate academic diploma (AAD) during the 2023-24 school year (including summer) regardless of their first year entering 9th grade or number of years taken to complete high school • Includes some students who entered grade 9 before 2020-21 and graduated late or who entered grade 9 after 2020-21 and graduated early (in both cases, student must graduate in 2023-2024) • Students who graduate from a CTE or adult high schools with a “P” in their enrollment status are eligible for TISA bonuses

The department identifies TISA graduates based on completion date and completion type information entered in EIS. To count as a TISA graduate, a student must have a completion document with a completion type of 1 (Regular Diploma), 8 (Alternate Academic Diploma), 11 (Regular Diploma with Foreign Language Waiver), 12 (Regular Diploma with Fine Arts Waiver), or 13 (Regular Diploma with Foreign Language and Fine Arts Waiver) attached to his or her enrollment for the 2023-2024 school year. Students with other completion types or with completion documents attached to another enrollment year will not be counted as TISA graduates. Districts shall ensure student completion date and completion type information for all students who graduated during the 2023-24 school year is entered correctly in EIS during Cohort Phase I (Fall and Spring Graduates) and Cohort Phase II (Summer Graduates). By the end of Phase II, the TISA graduate roster is final and can no longer be appealed during the College and Career Readiness (CCR) data verification process. See Table 2 in [Section 4](#) for required tasks in Phase I and Phase II related to finalizing the TISA graduate roster.

Section 4: Cohort Timeline

The graduation rate process occurs in four phases. **Phase I**—Districts will report and update student withdrawal information for the 2023-24 graduating cohort and completion information for both the 2023-24 graduating cohort and the 2023-24 graduating class, submit cohort change requests, and upload required documentation. **Phase II**—Districts will report summer graduates for the 2023-24 graduating cohort and 2023-24 graduating class, and submit appeals for appealable issues. **Phase III**—Districts will submit appeals for appealable issues, verify the federal graduation rate, and review preliminary graduation rates. **Phase IV**—Districts will review final graduation rates on the Accountability application prior to data being released on the [Data Downloads](#).

Districts can submit and update completion and withdrawal data for both the current cohort (i.e., 2023-24 graduating cohort) and future cohorts (i.e., 2024-25, 2025-26, and 2026-2027 graduating cohorts). Because students may move in and out of schools and districts throughout their high school years, **it is an optional task for districts to update data for future cohorts during the current cycle**. However, districts must make sure all information for the 2023-24 graduating cohort is complete and accurate by the end of the 2023-24 graduation cohort process as specified in this document.

Important! Table 2 highlights the key dates and tasks for each phase of the Cohort process. It is critical for districts to complete all tasks **by 9 p.m. CT on the specified deadline**. The department will also communicate all initial and final responses by 9 p.m. CT on the specific deadline. The department will deny any documentation or inquiries submitted after the deadline. Specific tasks for each phase detailed in the following sections.

Table 2. Cohort Process Timeline

Date	Milestone	Tasks
Cohort Phase I (February 5 – June 28, 2024)		
February 5 – June 7, 2024	Submission window: Phase I tasks complete	<p>During this window, districts shall complete the following tasks by June 6:</p> <ul style="list-style-type: none"> Submit (1) completion information (see Section 5.2) and (2) withdrawal information (see Section 5.3) for 2023-24 graduating cohort and 2023-24 graduating class in EIS. Submit Cohort Change requests and documentation using the Cohort Change Request form (see Section 5.4). Address all other cohort related issues (e.g., duplicate students) using the Cohort Change Request form (see Section 5.4). <p>The following tasks for the 2023-24 graduating cohort should be completed by June 7:</p> <ul style="list-style-type: none"> Upload acceptable withdrawal documentation (see Section 5.3) on the Cohort application. <p>Any new inquiries submitted after June 7 will be denied.</p>
June 10-14, 2024	Initial response window: Initial Approval/Denial	<p>During this window, the department will review all documentation submitted by June 7 and approve or deny the submitted documentation. All decisions will be reflected in the Cohort application by June 14. Districts are encouraged to check the Cohort application for</p> <ul style="list-style-type: none"> completion information withdrawal documentation approval or denial Cohort Change approval or denial

Date	Milestone	Tasks
June 17-21, 2024	Remediation window: Resubmission complete	During this window, districts shall complete the following tasks by June 21: <ul style="list-style-type: none"> Resubmit withdrawal documentation in Cohort application to correct denials. Resubmit cohort change requests to correct denials. The department will release a complete TISA graduate roster, except summer graduates, on the Accountability application on June 14. Districts shall review the roster and update completion information in EIS as appropriate (new task for TISA graduates).
June 24-28, 2024	Final Response window: Final approved or denied available in Cohort application	The department will review all remediation appeals submitted by June 21 during this window and make final decisions by June 28 . Districts are encouraged to check the Cohort application for <ul style="list-style-type: none"> completion type information withdrawal documentation approval or denial Cohort Change approval or denial The department will update the TISA graduate roster based on information updated in EIS and release the updated roster on the Accountability application by June 28. All decisions for Phase I tasks are final.
Cohort Phase II (July 8 - August 16, 2024)		
July 8 - August 2, 2024	Submission window: Phase II tasks complete	During this window, districts shall complete the following tasks by August 2: <ul style="list-style-type: none"> Report summer graduates for the 2023-24 graduating cohort and 2023-24 graduating class in EIS Import the complete student transcript data (extract 80) in EIS for the 2024 graduating cohort (optional) Submit appeals for appealable situations, including <ul style="list-style-type: none"> Department / system errors 60-day appeals Adult high school diploma completion
August 5-9, 2024	Initial response window: Initial response letter sent	The department will review all documentation submitted by August 2 during this window and approve or deny the submitted documentation. All decisions will be reflected in the Cohort application by August 9 . Districts are encouraged to check the Cohort application for <ul style="list-style-type: none"> summer graduate information reassignments resulting from 60-day appeals Additionally, the director of schools will receive an initial response letter by August 9 for any Phase II appeals submitted by August 2. The initial response letter will be uploaded on the Accountability application.
August 12-14, 2024	Remediation window: Resubmission complete	During this window, districts shall complete the following tasks by August 14 <ul style="list-style-type: none"> Resubmit appeals to correct denials if additional appropriate documentation is available. The department will release an updated TISA graduate roster including summer graduates on the Accountability application on August 9th. Districts shall review the roster and update completion information in EIS as appropriate. This is the final chance for districts to correct any information regarding TISA graduates in EIS. new task for TISA graduates.
August 16, 2024	Final Response window: Final response letter sent	The director of schools will receive a final response letter for the resubmitted appeals by August 16; the finalized TISA graduate roster will be released on the Accountability application; all decisions for Phase II tasks will be final.

Date	Milestone	Tasks
Cohort Phase III (August 26- October 4, 2024)		
August 26 - September 6, 2024	Submission window: Phase III tasks complete	During this window, districts shall complete the following tasks by September 6: <ul style="list-style-type: none"> • Submit appeals for appealable situations (see Section 5.1), including <ul style="list-style-type: none"> ○ department /system errors ○ receiving students because of another district's 60-day appeal ○ federal graduation rate appeals Any new inquiries submitted after September 6 will be denied.
September 9-20, 2024	Initial response window: Initial response letter sent	The department will review all documentation submitted by September 6 during this window and approve or deny the submitted documentation. <ul style="list-style-type: none"> • The director of schools will receive an initial response letter by September 20. • The initial response letter will be uploaded on the Accountability application.
September 23-27, 2024	Remediation window: Resubmission complete	During this window, districts shall complete the following tasks by September 27: <ul style="list-style-type: none"> • Resubmit appeals to correct denials if additional appropriate documentation is available.
September 30-October 4, 2024	Final Response window: Final response letter	The director of Schools will receive a final response letter for the resubmitted appeals by October 4; all decisions for Phase III tasks will be final; all data on the Cohort application are final.
Cohort Phase IV (October 11, 2024)		
October 11, 2024	Graduation Rate Review	All cohort and graduation data are final in Phase IV. Final Cohort data, including Federal Graduation Rate and Tennessee Graduation Rate, will be uploaded on the Accountability application by October 11 for district review. Graduation rate data will be under embargo until news release. Timeline for news release is to be determined.

Section 5: Phase I Tasks and Required Actions

The first phase of the 2023-24 graduation cohort process **opens on February 5, 2024 and closes on June 28, 2024**. Districts shall complete all Phase I tasks, including submitting information for both 2023-24 graduating cohort and 2023-24 graduating class, providing appropriate documentation, and resolving any Phase I specific issues (i.e., students assigned to the incorrect cohort or students with duplicate IDs) by 9 p.m. CDT on **June 7, 2024**. *Any Phase I related inquiries submitted after the specified timeline will be denied.*

Districts will have the opportunity to correct any issues that resulted in the denial of Phase I documentation by **June 21, 2024**. The following sections detail the specific tasks, steps, and potential pitfalls for districts to consider.

5.1. Reviewing Cohort Information

The department recommends that all districts download their student-level cohort data to resolve discrepancies between their list of expected graduates and the list of students who will form the denominator of their graduation rate. Districts can download their student-level data by following the steps below:

1. Navigate to the [Cohort application](#) or log in through Single Sign On.
2. Select the "User" option under "Log on As..." for the Cohort application.
3. Read the News and Timeline sections on the Instructions page of the Cohort application.
4. Click the checkbox that says, "I agree / I acknowledge that I have read the news."
5. Click the "Show Data" button.
6. Click the "Download CSV File" link.

Districts should filter these files for included students⁷ who have completion types other than 1, 8, 11, 12, or 13. These students will count against districts' graduation rates. Districts should compare these students to data in their SIS packages to ensure all students are counted correctly.

5.2. Submitting Completion Information

The department updates the Cohort application data nightly during Phase I. Districts must enter or update completion information in EIS and wait until the correction loads (the next day) before seeing it reflected in the Cohort application. The last date for districts to enter and update completion data in EIS is by **9 p.m. CDT on June 6, 2024**. Completion information submitted from districts' SIS packages must contain the following pieces of information in order to be accepted into EIS and into the Cohort application:

1. Completion type

⁷ Students are included in the cohort if: 1) they have a value of "Y" in the REVISED_INCLUDED_IN_COHORT column, 2) they have a value of "Y" in the INCLUDED_IN_COHORT column and no value in the REVISED_INCLUDED_IN_COHORT column, or 3) they have a value of "P" in the INCLUDED_IN_COHORT column and no value in the REVISED_INCLUDED_IN_COHORT column. INCLUDED_IN_COHORT is a flag for graduation rate calculation with a possible value of "Y," "N," or "P" (pending). The record is flagged as P (pending) if there is documentation to review. REVISED_INCLUDED_IN_COHORT is a flag reflecting pending changes as a result of documentation approval during phase I.

2. Completion date
3. Completion period

EIS will return an error if a submitted completion date falls outside the date parameters of the student’s enrollment (e.g., a completion date of 6/11/2024 for an enrollment that ends on 5/29/2024 will return an error and the student will consequently **not** be counted as a graduate if the error remains uncorrected). The only instance in which a completion date may postdate a student’s enrollment end date is if the completion period is listed as “SU” for summer, indicating that the student graduated after the official end of the school year and before the start of the following year. Districts will enter completion information for summer graduates during Phase II (see [Section 6](#) for more guidance).

For early graduates, districts should submit a withdrawal code of 12 in addition to providing an appropriate completion type, date, and period.

Important! It is essential to enter completion information in EIS before **9 p.m. CT June 6, 2024**. Any student without either a completion code or an acceptable withdrawal code will be counted as a non-graduate.

Table 3 shows the completion types used to identify what completion code students in the cohort should receive. This information can also be found in Appendix J of [EIS Appendices](#).

Table 3. Completion Types and Codes

Document Code	Completion Document Short Description
1	Regular Diploma
3	Special Education Diploma and did not take alternate assessments
5	No Diploma, Senior but did not complete
6	GED ⁸
7	Occupational Diploma (Valid as of 2015-16) – Completed the occupational diploma Skills, Knowledge, and Experience Mastery Assessment (SKEMA) and two years of paid or non-paid work experience
8	Alternate Academic Diploma – Students graduating with a special education diploma who are taking the alternate assessment and who meet the graduation requirements set by the state board
11	Regular Diploma with Foreign Language Waiver
12	Regular Diploma with Fine Arts Waiver
13	Regular Diploma with Foreign Language and Fine Arts Waiver

5.3 Submitting Withdrawal Information and Supporting Documentation

5.3.1 Entering Withdrawal Codes

The department updates the Cohort application data nightly during Phase I. Districts must enter or update withdrawal status in EIS and wait until the correction loads (the next day) in the Cohort

⁸ HiSet is a high school equivalency exam that is an alternative to the GED test. Students completing the HiSet exam should be given a completion code of 6.

application before uploading the required supporting documentation. Therefore, the last date for districts to enter and update withdrawal data in EIS is by **9 p.m. CT on June 6, 2024**, and the last date for districts to upload the required documentation to the Cohort application is by **9 p.m. CT on June 7, 2024**. Withdrawal information submitted from districts' SIS packages must contain a withdrawal reason and a withdrawal date. Table 4 describes the different withdrawal codes and cohort actions.

Table 4. Withdraw Codes and Cohort Action

Withdrawal Code	Description	Cohort Action
00	Dropout, under 18	Included in cohort; counted as dropout if there is no subsequent enrollment
01	Dropout, 18 and over	Included in cohort; counted as dropout if there is no subsequent enrollment
02	Transferred to a state institution with an education program	Excluded from cohort only if adequate documentation is provided indicating student is enrolled in a program that culminates in a regular high school diploma; otherwise, remains in cohort
03	Transferred to another Tennessee public school district	Included in cohort until receiving school reports subsequent enrollment in EIS; otherwise, counted as dropout if there is no subsequent enrollment
04	Transferred to and enrolled in another school in the same district	Included in cohort until receiving school reports subsequent enrollment in EIS; otherwise, counted as dropout if there is no subsequent enrollment
05	Transferred out of state	Excluded from cohort only if adequate documentation is provided; otherwise, included in cohort
06	Transferred to and enrolled in a non-public school ⁹ in Tennessee	Excluded from cohort only if adequate documentation is provided; otherwise, included in cohort
07	Withdrawal due to permanent illness or incapacitation where no return to school is anticipated and the withdrawal is considered permanent	Included in cohort
08	Deceased	Excluded from cohort only if adequate documentation is provided; otherwise, included in cohort
10	Withdrawal to home school	Excluded from cohort only if adequate documentation is provided; otherwise, included in cohort
11	Court-ordered placement or other government-mandated placement, such as jail or prison	Included in cohort
12	Early graduates who receive a regular high school diploma in less than four years	Included in cohort; counted as graduate if district assigns appropriate completion type (1, 8, 11, 12, 13)
13	Permanent dismissal from TN voluntary pre-K program	Not applicable to cohort
15	TEIS transition, non-eligible for special education services	Not applicable to cohort
16	Permanent withdrawal of students with disabilities (SWD) who received a completion document but remained in school (up to age 22) under the Free Appropriate Public Education (FAPE) provision	Only included in the graduation rate of one cohort based on year entered grade 9

⁹ Please consult [School Directory](#) for list of non-public schools.

Withdrawal Code	Description	Cohort Action
17	Transferred to and enrolled in an out-of-state online school	Excluded from cohort only if adequate documentation is provided; otherwise, included in cohort

5.3.2 Required Documentation for Withdrawal Codes

[Federal law](#) only allows students to be removed from the cohort if they enroll in another program that awards regular or alternate academic diplomas. Therefore, students are eligible for removal from the cohort only if they have one of the following withdrawal codes and submit the required documentation via the Cohort application to confirm enrollment after withdrawal (see list below):

- **Withdrawal Code 2 (transferred to a state institution with an education program)**
 - Transfer must be to an approved DCS school or institution¹⁰
 - The following documentation is required:
 - Written acknowledgement on official letterhead from an administrator at the state institution that the student is receiving educational services that culminate in a regular or alternate academic diploma **OR**
 - Written records request from state institution that indicates that the student has withdrawn to receive education services culminating in a regular or alternate academic diploma
 - With appropriate documentation, a student with a withdrawal code of 2 will be removed from the cohort; otherwise, the student will stay in the cohort and be counted against the graduation rate.
- **Withdrawal Code 3 (transferred to another Tennessee public school district)**
 - For this code, *no documentation is necessary* - once a district updates this code in EIS, the student will be moved to the other district's cohort. If the student is still appearing in the original district's cohort, the student either
 - Didn't complete the enrollment process at the receiving school (no subsequent enrollment in EIS) OR
 - Transferred to an adult high school or alternative school
 - If the original district has documentation that the student earned either a regular high school diploma or an alternate academic diploma after their withdrawal, it can submit an appeal during the Cohort phase II window to remove that student from their cohort.
- **Withdrawal Code 4 (transferred to another public school in the same district)**
 - For this code, *no documentation is necessary* - once a district updates this code in EIS, the student will be moved to the other school's cohort. If the student is still appearing in the original school's cohort, the student either
 - Didn't complete the enrollment process at the receiving school (no subsequent enrollment in EIS) OR
 - Transferred to an adult high school or alternative school
 - If the original school has documentation that the student earned either a regular high

¹⁹ Please contact [TN Department of Children's Services](#) for more information about DCS approved schools and institutions.

school diploma or an alternate academic diploma after their withdrawal, it can submit an appeal during the Cohort phase II window to remove the student from their cohort.

- **Withdrawal Code 5 (transferred out-of-state/out-of-country)**

- If the student withdrew to an accredited out-of-state public or private high school, the following documentation is required:
 - Written records request from receiving out-of-state public or private high school that awards a regular diploma indicating enrollment, **OR**
 - Written acknowledgement on official letterhead from an administrator at a receiving out-of-state school that awards a regular diploma confirming enrollment, **OR**
 - Official records/transcripts from a receiving out-of-state public or private high school that awards a regular diploma confirming enrollment, **OR**
 - Official, fully completed intent to home school documentation from another state
- For students who have moved out of the country for whom the above documentation cannot be obtained, the following may be accepted:
 - Written confirmation from a parent or guardian of a transfer out-of-country
 - A school administrator's documented conversation with a parent or guardian confirming a transfer out-of-country
- For foreign exchange students, a copy of the official exchange program paperwork reflecting the year of participation on exchange agency letterhead is acceptable, provided the documentation specifies an end date for the student's exchange program.
- With appropriate documentation, a student with a withdrawal code of 5 will be removed from the cohort; otherwise, the student will stay in the cohort and be counted against the graduation rate.

- **Withdrawal Code 6 (transferred to and enrolled in a non-public school in Tennessee)**

- The documentation submitted for this withdrawal code must confirm that the student fully enrolled and attended the private school.
 - If the documentation submitted merely states the student has "applied," it will be denied. Districts submitting documentation for this withdrawal code should carefully review the documentation received from the private school to ensure it confirms enrollment.
 - Further, only students withdrawing to private schools that are accredited can be approved for this withdrawal code. You can find a list of accredited Tennessee private schools in the [School Directory](#).
- The following documentation is required:
 - Written records request from receiving non-public school confirming enrollment; **OR**
 - Written acknowledgement on official letterhead from an administrator at the receiving school confirming enrollment that includes the student's full name and student ID; **OR**
 - Official records/transcript from the non-public school confirming enrollment.
- With appropriate documentation, a student with a withdrawal code of 6 will be removed from the cohort; otherwise, the student will stay in the cohort and be counted against the

graduation rate.

- **Withdrawal Code 8 (deceased)**

- The following documentation is required:
 - Official written documentation, such as a death certificate, **OR** An obituary or funeral program that includes the students' full name.
- With appropriate documentation, a student with a withdrawal code of 8 will be removed from the cohort; otherwise, the student will stay in the cohort and be counted against the graduation rate.

- **Withdrawal Code 10 (withdrawal to homeschool)**

- The following documentation is required:
 - [Official Intent to Home School form¹¹](#). This form must be signed either physically or digitally by the parent of the student, regardless of the student's age. If the parent signs the form digitally, there must be a digital time stamp with the signature.
 - If a district uploads documentation other than the Intent to Home School form, or the form is not fully complete and properly signed by the student's parent, the documentation will be denied.
 - Example of appropriate digital signature

Part 3. Health Records

Please attach documentation that student(s) have received immunizations as required by T.C.A. § 49-6-5001.

John Smith

Parent/Guardian Signature

Digitally signed by John Smith
Date: 2023.10.03 15:32:54 -05'00'

10/3/23

Date

- With appropriate documentation, a student with a withdrawal code of 10 will be removed from the cohort; otherwise, the student will stay in the cohort and be counted against the graduation rate.

- **Withdrawal Code 17 (transferred to and enrolled in an out-of-state online school)**

- The following documentation is required:
 - Written records request from the online school; **OR**
 - Written acknowledgement on official letterhead from an administrator at the online school confirming enrollment that includes the student's full name; **OR**
 - Official records/transcripts from the online school confirming enrollment.
- Withdrawal code 17 should **only** be used for students who withdraw from traditional brick-and-mortar schools to enroll in a school in which the content is delivered via the Internet and the school location is not in Tennessee.
- With appropriate documentation, a student with a withdrawal code of 17 will be removed from the cohort; otherwise, the student will stay in the cohort and be counted against the graduation rate.

¹¹ This form may be used for home school students both in Tennessee and other states.

In summary, any student who has an eligible withdrawal code (i.e., 02, 05, 06, 08, 10, or 17) without proper corresponding documentation will remain in the cohort and be counted against the graduation rate. As such, the department recommends that districts filter their student-level files by withdrawal reason to ensure they have uploaded documentation for all eligible students. **Please note that the department will deny any inquiries or documentation to remove students submitted past the specified timeline as presented in [Section 4](#).**

5.4 Cohort Change Requests

While students who were correctly assigned to a given cohort upon entering 9th grade but later withdrew can be removed using the Phase I withdrawal appeals process outlined above in [Section 5.3](#), sometimes due to enrollment errors, students are assigned to the incorrect cohort. Districts must address this issue during the Cohort Phase I window by submitting a Cohort Change request.

Districts should review student records and verify data in SIS, EIS, and the Cohort application carefully to make sure students are assigned to the correct cohort. If errors are found, districts must submit cohort change requests according to the specific format and timeline outlined in the [Cohort Change Instructions](#). **If districts fail to submit cohort change requests, students will be assigned to the wrong graduating cohort, and the data cannot be corrected after Phase I.**

The following issues should be addressed by submitting a cohort change request:

- **Incorrect Cohort Year**
 - If a student is appearing in the incorrect cohort year in the cohort application, the district must complete the following:
 - Check EIS and update the YE9 (year entered 9th grade) value to the correct year the student first entered 9th grade. This value should equal the fall semester that the student entered 9th grade for the first time. Note that repeating any grade (including 9th grade) does not change a student's YE9 value nor their cohort assignment.
 - Then, submit a cohort change request to move the student to their correct cohort year.
 - **Required documentation:** Student's transcript that confirms the student's correct 9th grade entrance year.
 - **Important:** Students cannot be moved to a previous cohort year that has already been finalized.
- **Duplicate Student ID**
 - If a student has a duplicate ID in the Cohort application, the district must complete the following:
 - Check EIS for the duplicate ID. If the duplicate ID is present in EIS, please email DT.Support@tn.gov and ask them to remove the duplicate ID from EIS.
 - Once the duplicate ID is removed from EIS, submit a cohort change request to exclude the duplicate ID from the cohort.
 - **Required documentation:** Correct and duplicate student ID numbers and any

correspondence with DT.Support confirming the duplicate ID has been removed from EIS.

- **Student enrolled in an Individualized Education Account (IEA) program**
 - Submit a cohort change request to exclude the student from the cohort.
 - **Required documentation:** Student's current transcript from the non-public school or program where the student is primarily enrolled. An additional transcript from the district would also be helpful to show the IEA enrollment.

- **9th Grade No-Show/District Enrollment Error**
 - If a student is expected to attend a high school at the beginning of the 9th grade year but never shows up, or a student's enrollment "rolls up" due to district error to a high school that he or she never actually attends, that student may be removed from the cohort. Note that if a student shows up for 9th grade for a brief time but later withdraws, they are not eligible for this appeal (see [Section 5.3](#) for instructions on submitting withdrawal documentation).
 - Submit a cohort change request to exclude the student from the cohort.
 - **Required documentation:** Letter on official letterhead from a school or district administrator that confirms the student(s) in question never attended school during grade 9 or higher in the district.

- **Service Enrollment**
 - If a student enrolled in the school/district in grades 9-12 for special education services only, please submit a cohort change request to exclude the student from the cohort.
 - **Required documentation:** Documentation (e.g., transcript, letter, EIS data, or records request) providing evidence that the student was primarily enrolled somewhere else, as well as evidence that the student carries an EIS enrollment code "S" (service enrollment) at the incorrectly assigned school.

- **Student Missing from the Cohort**
 - If a student is not appearing in any cohort year for the school or district, please check EIS to confirm the student's enrollment information and YE9 value are both entered correctly. If any information in EIS is incorrect, please update.
 - After correcting the information in EIS, please submit a cohort change request to include the student in the cohort.
 - **Required documentation:** Student's transcript confirming the dates attended.

5.5 Review TISA Graduate Roster

Throughout the Phase I window, districts should submit completion information for all students who graduated in fall 2023 or spring 2024, regardless of when that student entered 9th grade. On June 14th, the department will release an initial roster of all students currently credited as TISA Graduates to the accountability application. This roster will contain all students who are credited as having received a

regular or alternate academic diploma during the 2023-24 school year (see [Section 3](#) for more information on who is counted as a member of the 2023-24 Graduating Class). Districts should check this roster to verify that all students expected to be counted as part of the 2023-24 Graduating Class are included and update completion information in EIS accordingly.

5.6 Final Checks

As a final check, districts should ensure they can answer 'yes' to the following questions before the Phase I deadline.

1. Did the district submit completion information for cohort graduates and verify that the information was loaded into the Cohort application?
2. Did the district submit completion information for TISA graduates and verify TISA graduate roster (released on June 14th)?
3. Did the district submit withdrawal information for all applicable students and verify that the information loaded into the Cohort application?
4. Did the district upload documentation for all students with withdrawal codes of 02, 05, 06, 08, 10, and 17 that satisfies the requirements outlined in the guidance documents?
5. Did the district verify that the list of students in the Cohort application matches the list of expected graduates in the district's SIS package (i.e., there are no students who, by virtue of a data entry error, were entered into the incorrect cohort)?

Section 6: Phase II

The second phase of the 2023-2024 Graduation Cohort process **opens on July 8, 2024 and closes on August 16, 2024**. Districts should complete all Phase II tasks, including (1) entering completion status for summer graduates of the 2023-24 graduating cohort and 2023-24 graduating class, (2) verifying the TISA Graduates roster and updating completion data as appropriate, (3) submitting appeals for appealable situations, and (4) importing the complete student transcript data (extract 80) in EIS for the 2024 graduating cohort (**optional**) by 9 p.m. CDT on **August 2, 2024**. *Any Phase II related inquiries submitted after the specified timeline will be denied.* Districts will have the opportunity to correct any issues that resulted in the denial of Phase II documentation by **August 14, 2024**. The following sections detail the specific tasks, steps, and potential pitfalls for districts to consider. More information regarding Phase II tasks will be available in summer 2024.

6.1 Entering Summer Graduate Information

Districts should submit completion information for summer graduates and verify that the data has loaded correctly in the Cohort application during Phase II. Summer graduates must have a completion date **AFTER** the Phase I deadline (June 7, 2024) **AND** a completion code of **SU**. Failure to enter the correct completion date and code will cause an error in EIS that will prevent the data from loading correctly into the Cohort application. Completion documents may have any date **prior to the Attendance Start** date of the following school year. However, **the End of Service Action** date must be **before the Attendance End** date of the school year in which the student is graduating. Also, summer graduates **should not** have a new enrollment for summer school. This will create an error and not allow for the student to be pulled from EIS into Cohort when manually updated. Please refer to [Section 5.2](#) for more details about submitting completion information.

Please note that completion information for summer graduates will not load into the Cohort application automatically from EIS¹², as these data require a manual process. Please also note that the data will be updated manually each week even though the Cohort application may list the date the data were last updated as mid-June.

6.2 Phase II Appeals

During Phase II, districts can submit appeals for the following situations. All appeals must be submitted by **9 p.m. on August 2, 2024** to be considered. Any appeals submitted after the deadline will not be reviewed.

6.2.1 Department Error

Districts can submit appeals for incorrect data that are the result of a department error in failing to update data in accordance with an appeal that was previously approved by the department. To support the appeal, districts must provide **written confirmation** that the department committed to updating the Cohort application but did not do so (e.g., moving students from the current cohort to next year's cohort; approved appeals shown in the initial or final response letters).

¹² Issues with EIS should be reported to the District Technology Help Desk at DT.Support@tn.gov.

6.2.2 System Error

Districts can submit appeals when the district's EIS extracts failed to process **before** the Phase I deadline. A screenshot of the extract submission error message, including the date and time stamp, may be used to document the error. Districts should email DT.Support@tn.gov to resolve the issue and notify the department at TNEG.Graduates@tn.gov immediately when a failure to the process occurs.

6.2.3 60-Day Appeals

In general, students count in the district and school in which they were most recently enrolled. However, [T.C.A. 49-1-601\(a\)](#) allows students to be assigned to the school in which the student was enrolled for the greatest proportion of days across grades 9-12 if that student did not attend the same high school for at least 60 days of the most recent school year. For instance, if a student was enrolled in a school or district for less than 60 days of the most recent school year, the school or district can submit an appeal and documentation to have the student reassigned to the school or district in which they spent the majority of their time in high school.

Following a 60-day appeal approval, the department will then send a letter to schools and districts whose cohort data are impacted by the 60 Day Appeals process **by August 9**. If a school receives a student back into their 2024 graduation cohort, and they have sufficient documentation that the student withdrew from Tennessee public schools (see [Section 5.3](#)), they can submit an appeal for review in Phase III.

6.2.4 Student Completed Diploma Program at Adult High School

If the district has students included in the cohort who withdrew to an adult high school, the district can submit an appeal during the Phase II submission window to remove the student from the cohort if the student completed an educational program that led to a regular or alternate academic diploma. The district must provide documentation confirming the student earned a regular or alternate academic diploma on-time (i.e. diploma or official transcript).

6.2.5 Student Has Inaccurate Completion Type

If a student has an inaccurate completion type in the Cohort application (i.e., the student is credited with a completion type despite not actually earning a diploma), districts may submit an appeal to remove the completion type.

6.3 Review TISA Graduate Roster

As presented in Table 2, by the end of Phase I, the department will release an updated roster of all students credited as 2023-24 TISA Graduates to the accountability application reflecting information entered in EIS during Phase I. This initial list will not have any completion data for summer graduates.

In Phase II, one of the main tasks that districts shall complete is to enter summer graduates in EIS, including the 2023-24 graduating cohort as well as the 2023-24 graduating class by August 2. Based on data entered in EIS by August 2, the department will update the TISA graduate roster to include summer graduates and release the updated file on the Accountability application by August 9. Districts shall

review the updated roster to ensure summer graduates are accurately reflected in the TISA Graduates data file. If students are not accurately reflected in the data file, districts shall review and correct EIS data as appropriate. Any incorrect information in EIS must be addressed by August 14. The department will make a final roster update by August 16 and release the data on the Accountability application. The TISA Graduate Roster is then final and can no longer be appealed.

6.4 Final Checks

As a final check, districts should ensure they can answer all of the following questions affirmatively before the Phase II deadline.

1. Did your district submit completion information for all summer Cohort graduates and verify that the information loaded into the Cohort application?
2. Did the district submit completion information for TISA graduates who graduated in summer and verify the TISA graduate roster?
3. Did your district submit appeals for applicable students following the appeals guidance and appeals instructions?
4. If your district submitted appeals, did your district review and retain the appeals response letter sent to your director of schools?

Section 7: Phase III

The third phase of the 2023-2024 Graduation Cohort Process ***begins on August 26, 2024 and closes on October 4, 2024***. Districts shall complete all Phase III tasks, including (1) submitting appeals for summer graduates (only for appealable situations), (2) submitting appeals for receiving students because of a 60-day appeal approval, and (3) submitting appeals for federal graduation rate reporting by 9 p.m. CDT on **September 6, 2024**. *Any Phase III related inquiries submitted after the specified timeline will be denied.*

Districts will have the opportunity to correct any issues that resulted in the denial of Phase I documentation by **September 27, 2024**. The following sections detail the specific tasks, steps, and potential pitfalls for districts to consider. More information regarding Phase III tasks will be available in summer 2024.

7.1 Phase III Appeals

During Phase III, districts can submit appeals for the following situations. All appeals must be submitted by **9 p.m. on September 6, 2024** to be considered. Any appeals submitted after the deadline will not be reviewed.

7.1.1 Summer Graduate Appeals

Districts can submit appeals for summer graduates if there was a department or system error (see guidelines in [Section 5.1](#)).

7.1.2 Receiving a 60-Day Student Appeals

Districts can submit an appeal for students they received because of another district's 60-day appeal. The appeal must be supported by appropriate documentation (e.g., enrollment record or withdrawal documentation).

7.1.3 Federal Graduation Rate Appeal

As discussed in [Section 2.1](#), students with a regular diploma must also ***complete all required coursework in all subject areas*** to be counted as graduates in the federal graduation rate calculation. In Phase II, districts may import the complete student transcript data in EIS. The department will then use the enrollment data and student transcript data, when available, to identify an ***exclusion list*** comprised of students who should be removed from the numerator of the federal graduation rate calculation per federal guidelines. The exclusion list will include any students who received a regular diploma but did not receive a credit in Algebra II/Integrated Math III and/or Chemistry or Physics. In Phase III, districts will be able to download the exclusion list from the Accountability application. Districts shall review the exclusion list and submit appeals, as needed, to finalize the list for the federal graduation rate calculation.

7.2 Final Checks

As a final check, districts should ensure they can answer all the following questions affirmatively before the Phase III deadline.

1. Did your district submit appeals for applicable students following the appeals guidance and appeals instructions?
2. If your district submitted appeals, did your district review and retain the appeals response letter sent to your director of schools?

Section 8: Phase IV

The last phase of the 2023-24 graduation cohort process is the release of the graduation rates, including Federal Graduation Rate and Tennessee Graduation Rates, on the Accountability application by **October 11, 2024**. At this stage, all Cohort and Graduation data for 2023-24 graduating cohort are final. Cohort and Graduation data are under embargo until news release the fall of 2024.

Section 9: Conclusion

We hope this guide helps navigate the graduation cohort process. Please feel free to provide feedback on this document or share any recommendations for support resources to TNEducation@tn.gov. Thank you for your continuing efforts to ensure that your district's graduation rate data are as accurate as possible.