

2025-26 Graduation Cohort Phase I Frequently Asked Questions

February 2026

This document aims to address common questions that arise during Phase I of the Graduation Cohort Appeals process. For more information on timelines and procedures for submitting appeals, please reference the [2025-26 Graduation Cohort Process Phase I Guide](#).

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Timeline and General Process Information

1. What are the key submission dates during Phase I?

Phase I appeals tasks must be completed by 9 p.m. CDT on June 5, 2026, including (1) submitting withdrawal documentation for the 2025-26 graduating cohort, (2) submitting Cohort Change requests and (3) addressing all other cohort related issues (e.g., duplicate students, students not included in a graduation cohort) using the [Graduation Cohort Change Request form](#). In addition to entering and updating information in EIS/TEDS, districts should also provide acceptable documentation by the specified deadline.

Phase I data submission tasks must be completed by 9 p.m. CDT on June 25, 2026, including (1) entering completion information for both the 2025-26 graduating cohort and the 2025-26 graduating class and (2) reviewing the TISA Graduates roster and correcting data in EIS/TEDS as appropriate.

During Phase I, there is a district submission timeline, a department review timeline, and a district review and remediation timeline. Please consult Table 1 of the [2025-26 Graduation Cohort Process Phase I Guide](#) for a detailed list of tasks and timelines.

2. Can districts submit and update data for future cohorts?

Yes, districts can submit and update data for not only the current cohort (i.e., 2025-26 graduating cohort) but also future cohorts (i.e., the 2026-27, 2027-28, and 2028-29 graduating cohorts). Districts must make sure all information for the 2025-26 graduating cohort is complete and accurate by the end of the 2025-26 graduation cohort process as specified in this document.

3. Will data for the 2025-26 Graduation Cohort be sourced from EIS or TEDS?

Relevant data for students in the 2025-26 graduation cohort includes various data elements from the 2022-23, 2023-24, 2024-25 and 2025-26 school years. For all data elements that are tied to a particular school year, including enrollment, withdrawal, diploma, and course completion data, information will be sourced from EIS or TEDS depending on the school year the data element is from. Specifically, data elements from the 2022-23, 2023-24, and 2024-25 school years will be sourced from EIS, while data elements from the 2025-26 school year will be sourced from TEDS. For global data elements persisting across school years, including student name, birth date, and demographic data, information will be sourced from TEDS unless the student in question was not enrolled in the 2025-26 school year, in which case such data will be obtained from EIS. Given the mix of data sources for the 2025-26 graduation cohort, districts should make sure that data for the 2025-26 graduation cohort is accurate in both EIS and TEDS.

4. When looking up student information in the Cohort Application and submitting appeals, should districts reference a student's Legacy SSID or Ed-Fi ID?

All students in active graduation cohorts have both a Legacy SSID (the seven-digit number used to identify students in the EIS database) and an Ed-Fi ID (an eight-digit combination of letters and numbers used to identify them in the TEDS database). For the 2025-26 Cohort Process, the Cohort Application's STUDENT_KEY identifier will continue to reflect their Legacy SSID. As such, all references to student ID in this document refer to a student's Legacy SSID number rather than his or her Ed-Fi ID.

5. Why does the department require accurate information regarding student subgroup inclusion, and what should districts do if subgroup information is inaccurate?

The federal Every Student Succeeds Act (ESSA) requires states to calculate and report disaggregated subgroup graduation rates. At a minimum, every student must be included in a race/ethnicity subgroup. Where appropriate, students may also be flagged as Economically Disadvantaged (ED), English Learners (EL), and/or Students with Disabilities (SWD). For the purposes of graduation rate calculations, students will be included in the ED, EL, or SWD

subgroup(s) if the student was included in the subgroup at any time since entering high school. For example, if a student was receiving special education services for two years in high school but was no longer receiving services at the time of graduation, the student would still be flagged for inclusion in the SWD subgroup of a school's graduating cohort. Districts should verify student subgroup assignment(s) in the cohort CSV download file and correct any inaccurate subgroup information before the end of Phase I.

Reviewing Cohort Information

6. How do districts review 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 numerator of their graduation rate. Districts can download their student-level data using these steps:

1. Navigate to the [Cohort application](#) or log in through Single Sign On.
2. Select the "User" option under "Logon 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.

Using the Cohort Application's drop-down menus, districts can download data for all four active Graduation Cohorts (i.e., 2025-26, 2026-27, 2027-28, 2028-29). Districts should filter these files for included students¹ who have completion types *other* than 1, 8, 11, 12, or 13, as 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.

7. What is the difference between "Included in Cohort" and "Revised Included in Cohort?"

The `included_in_cohort` field is the most important field in the cohort file for districts to track, as it indicates whether a student is currently being included in graduation rate calculations. Students with "Y" for `included_in_cohort` will be included in graduation rate calculations, while students with "N" are not and have been removed from the cohort. The `revised_included_in_cohort` field tracks the status of students for whom districts have uploaded withdrawal documentation during Phase I. When a piece of withdrawal documentation is approved, the `revised_included_in_cohort` field is set to "N;" when it is denied, this field is set to "Y." *At the end of Phase I, all students that have a value of "N" for revised_included_in_cohort will have their value for included_in_cohort updated to "N."*

8. Why does the "Included in Cohort" column show a "P?"

A "P" for `included_in_cohort` reflects that a student's inclusion in the graduation cohort is pending the results of the Phase I appeals process. This code displays for all students that have withdrawal codes that make them eligible to be removed from the cohort (i.e., withdrawal codes 2, 5, 6, 8, 10, 11, and 17). At the end of Phase I, this code will automatically change to a "Y" to signify that a student **is** included in the cohort, unless supporting documentation is submitted and approved prior to the end of the Phase I deadline. If the documentation is submitted during Phase I and approved by the department, the code will change to "N" to signify that the student

¹ Students are included in the cohort if: 1) they have a value of "Y" in the INCLUDED_IN_COHORT column, 2) they have a value of "P" in the INCLUDED_IN_COHORT column and do not have a value of "N" 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.

is not included in the cohort.

9. What is the “Pending Included in Cohort” field mean?

The pending_included_in_cohort field tracks the status of students whose most recent enrollment entry in EIS/TEDS indicates that they have withdrawn from public school to participate in a special state-funded program. Students participating in the ESA (Education Savings Account) or IEA (Individualized Education Account) programs are given a “N” for pending_included_in_cohort. *If the enrollment status of these students does not change by the end of Phase I, their value for included_in_cohort will be updated to “N.”*

10. What is the difference between a student’s “Cohort Year” and his/her “Year Entered Grade 9?”

USED requires that graduation cohorts be constructed based on the year each student first entered grade 9. For instance, a student who first entered ninth grade in the Fall of 2022 would be included in the “2022” cohort with other students expected to graduate in 2025-2026. When a district submits high school enrollment information to EIS/TEDS for a given student for the first time, that student is added to the Cohort Application and their value for “cohortyear” is set to match the year of the student’s first ninth grade enrollment, and the student is included in the graduation cohort file matching their value for cohortyear.² The year_entered_grade9 field, on the other hand, reflects the value the district had on file for the student’s first year entering ninth grade and included when submitting the “Student” extract to EIS for a given student. While the value for year_entered_grade9 is not the official cohort year for a student, it is also included in the district’s downloadable cohort file for reference to assist in troubleshooting. This value should be the same as the student’s cohort year. Districts should check their cohort file for discrepancies between student values for “cohortyear” and “year_entered_grade9” and submit Cohort Change Requests, as necessary. For more information on reviewing cohort files and submitting cohort change requests, please consult Sections 4 and 7 of the [2025-26 Graduation Cohort Process Phase I Guide](#), respectively.

Addressing Cohort Issues

11. What should a district do if a student’s “Cohort Year” is listed incorrectly in the Cohort application or a student is included in the incorrect Cohort file?

USED requires that graduation cohorts are constructed based on the year each student **first entered grade 9**. A student is included in a graduation cohort file based on their “cohortyear.” The “cohortyear” value in the Cohort Application typically reflects earliest 9th grade enrollment a student has in EIS/TEDS. In the event that the “cohortyear” for a student is incorrect, the district must provide a transcript documenting how the actual year the student first entered grade 9 is different than the student’s value for “Cohort Year” in the Cohort application.³ Districts must submit a [Graduation Cohort Change Request form](#) and attach a [Cohort Change Request Worksheet](#). Specific directions for this process, including submission dates and timeline, are available in Section 7 of the [2025-26 Graduation Cohort Process Phase I Guide](#).

12. What action should be taken by a district upon finding a student who should have been included in a prior year’s cohort?

Federal guidance requires students to be included in a cohort with others who first enrolled in grade 9 in the same year. It is essential that districts ensure student cohort assignment is accurate during Phase I, as once the cohort data is final, it cannot be altered. One commonly denied issue submitted during Phase I is any cohort change request to remove a student who should have been included in a previously finalized graduation year’s cohort from an active cohort. For example, a student who is currently included with the graduation cohort of students who first entered ninth grade in the year 2022 and are expected to graduate in 2025-26, but whom the district

² All students in a given graduation cohort’s data file have the same value for “cohortyear.”

³ If the student was not properly included in the prior year’s graduation rate, the request may still be denied. See FAQ #12.

realizes actually first entered ninth grade in fall of 2021 (and therefore should have been included in last year's previously finalized and reported graduation cohort). Removing this student from the current cohort would remove the student from graduation rate reporting entirely, which is not permitted per federal guidelines. This issue should have been addressed during the prior year's cohort process. This example highlights the importance of close review by districts during the cohort data verification process to ensure data quality and accuracy. In Phase I, the department will release a Potential Cohort Issues Report in the Accountability application to assist districts with the cohort review process. See [Q15](#) for more information.

13. What should a district do if the cohort has a student with multiple state IDs or two students with the same student ID?

These cases can arise when students transfer between districts or because of atypical enrollment situations. To reconcile these records, please contact the Help Desk at DT.Support@tn.gov. In cases where a duplicate ID is merged, districts must also submit a Cohort Change Request. Once DT.Support@tn.gov has confirmed the merger, districts should submit a [Graduation Cohort Change Request form](#) and attach a [Cohort Change Request Worksheet](#). Specific directions for this process, including submission dates and timelines, can be found in Section 7 of the [2025-26 Graduation Cohort Process Phase I Guide](#). The process for merging student IDs is not complete until the cohort change request is submitted and processed by the department.

14. What action should be taken by a district for a student who spent less than 60 days in a school in his or her final year of enrollment?

Students in the 2025-26 cohort who dropped out (as indicated by a withdrawal code of 0 or 1 on the student's cohort enrollment) and did not attend the same high school for at least 60 days of the last school year in which they were enrolled will be automatically reassigned to the school in which the student was enrolled for the greatest proportion of days across grades 9-12 at the start of Phase II.

The department will upload a file to the Accountability Application that includes all students that left or entered a school's cohort due to a 60-Day Reassignment. If, after reviewing this file, a district believes that a student was reassigned in error or that a student that should have been reassigned to another school's cohort was not reassigned, it can submit a Phase II appeal. For more specific information regarding how to submit Phase II appeals and required documentation, districts should consult the 2025-2026 Graduation Cohort Phase II and III Appeals Guide, available in summer 2026 on the Accountability [website](#) and the Accountability Application.

Important Update. The department will no longer consider students with withdrawal codes other than 0 or 1 (e.g., 2, 3, 4, 5, 6, 8, 10, 11, 17) for 60-day reassignments. Districts should ensure that all withdrawal codes are accurate by the end of the Phase I deadline and upload withdrawal documentation for all applicable students. Students with withdrawal codes 3 or 4 that do not have a subsequent enrollment in EIS/TEDS and students with withdrawal codes 2, 5, 6, 8, 10, 11, or 17 that do not have approved documentation uploaded to the Cohort Application prior to the Phase I deadline will count as non-graduates in a school's dropout rate (even if the student in question meets all other criteria for a 60-day reassignment).

Reviewing the Potential Cohort Issues Report

15. What is the Potential Cohort Issues Report?

To assist districts in identifying potential issues with their graduation cohort, the department will upload a Potential Cohort Issues Report to the Accountability Application's File Downloads page at the start of Phase I. This file contains rows for all students that the department has flagged as potentially being assigned to the wrong cohort or otherwise incorrectly included in a cohort. There are seven types of flagged issues:

- Alternative School Primary Enrollment

- Alternative School Student Lacks Home School Enrollment in Most Recent District
- Legacy SSID Duplicated in TEDS
- Legacy SSID No Longer Exists in EIS/TEDS
- Mismatch Between Cohort Year and First Grade 9 Year
- Potential Enrollment Rollover Error
- Student Enrolled in Adult High School Before Age 17

Districts should review this report carefully and take proper action accordingly. Please consult Table 3 in the [2025-26 Graduation Cohort Process Phase I Guide](#) for more guidance on the recommended actions to address these issues. If districts carefully review the report and determine the flagged data element is not an error, no action is needed. However, if there are indeed data errors, districts must take actions as recommended in Table 3 during Phase I.

16. Why is a student for whom a Cohort Change Request was approved still appearing on the Cohort Issues Report?

The Potential Cohort Issues Report is updated monthly during the third Thursday of each month. Once a district corrects an identified Cohort issue in EIS/TEDS or through the Cohort Change Request process, the flag will be removed when the report is next updated. Districts can view the last time the Potential Cohort Issues Report was updated by looking at the title of the downloaded file. For example, a report with the file title “190_2025_CohortIssuesReport_16Apr2026” was last updated on April 16, 2026, and will be updated again on May 21st, 2026. The first Potential Cohort Issues report is run at the start of Phase I; the report is updated monthly until the last version is uploaded in May.

Reviewing the TISA Roster

17. How is the TISA Roster constructed?

On June 12, 2026, the department will pull data from TEDS for all students who have a completion document associated with any of his or her enrollments from the 2025-26 school year. Students with a record indicating that a completion type of 1, 8, 11, 12, or 13 was earned between August 1st, 2025, and July 31st, 2026, will be included in the TISA Roster.

In the TISA Roster file, students will be assigned to the district and school to which the completion document is attributed in TEDS (including adult high schools). In cases where students have multiple instances of eligible completion documents from the 2025-26 school year in TEDS, those students will only appear in the TISA Roster a single time. In these cases, the department will take the student’s document with the strongest completion type (e.g., a traditional high school diploma over a traditional high school diploma with waivers; a traditional high school diploma with waivers over an Alternate Academic Diploma). If equivalent completion documents for the 2025-26 school year still exist for a given student, the document attached to that student’s most recent 2025-26 enrollment will be used.

18. Where can districts find their TISA graduate roster?

On June 12, the department will release an initial TISA graduate roster to the Accountability application. This initial roster will include all students from the 2025-26 graduating class with sufficient completion date and completion type information to be credited as a TISA graduate in TEDS as of June 11. Districts will verify this roster and update completion data in TEDS as appropriate before the June 25th deadline for Fall/Spring completion data. Districts will have the opportunity to verify summer graduates during Phase II. For more information on the difference between the 2025-26 Graduating Cohort and 2025-26 Graduating class, consult Section 4 and Table 2 of the [2025-26 Graduation Cohort Process Phase I Guide](#).

19. Why is a student not showing up in my district's TISA Roster?

The department identifies TISA graduates based on completion data entered in TEDS. If district did not submit completion data for a student, did not attach a student's completion document to an enrollment from the 2025-26 school year, did not indicate a completion date between August 1st, 2025, and July 31st, 2026, or did not indicate a completion type of 1, 8, 11, 12, or 13, the student may not appear in the district's TISA Roster. Additionally, while the Cohort Application is updated nightly, the TISA roster is updated periodically and therefore might not reflect a district's most recent data submissions. The TISA roster is updated at the following intervals:

- Initial Release: June 12th, 2026
- First Update: June 26th, 2026
- Second Update: August 7th, 2026
- Finalized Roster: August 14th, 2026

Districts can see the last time their TISA Roster was updated by downloading the file and reading the file title, which indicates the date the TISA Roster was last updated. For example, a TISA Roster with the file title "190_2026_TISARosterStudentFile_12Jun2026" was last updated on June 12, 2026. Please see Section 5 of the [2025-26 Graduation Cohort Process Phase I Guide](#) for instructions for submitting completion information.

Submitting Completion Information

20. What is the deadline for submitting completion information to EIS/TEDS?

All fall/spring completion information for members of the 2025-26 graduation cohort and graduating class must be submitted to TEDS by **June 25, 2026**; all summer completion information must be submitted by **August 13, 2026**. For students who graduated prior to 2025-26 but for whom districts did not submit their completion information in EIS due to an oversight, districts must re-submit the information to EIS. Records with a completion date prior to August 1, 2025 (very early graduates), will be considered for cohort purposes; however, these records will not be considered for TISA purposes given that the TISA graduating class only considers students who had a completion date between August 1, 2025, and July 31, 2026.

Completion data (including a student's completion type and date) is final by the end of Phase II of the Graduation Cohort Process. Districts will not be able to appeal student completion data during Phase III of Cohort Process or during future phases of the CCR Process. For more information on this timeline, please consult Section 1 of the [2025-26 Graduation Cohort Process Phase I Guide](#).

21. Why is completion information our district submitted to EIS/TEDS not reflected in the Cohort application?

The department updates the Cohort application data nightly during Phases I and II. Districts must enter or update completion information in EIS/TEDS by submitting end-of-service information and wait until the correction loads the next day in the Cohort application. Additionally, completion documents must be attached to a student's most recent primary non-alternative, non-adult enrollment in EIS/TEDS; completion documents attached to earlier enrollments at the same school or to secondary, alternative, or adult enrollments will not process.⁴ The last date for districts to enter completion data in EIS/TEDS for Fall/Spring graduates is by **9 p.m. CDT on June 25, 2026**. EIS/TEDS changes made after Phase I will not be reflected in the Cohort application. It is the district's responsibility to ensure the Cohort application has been updated with all changes reported to EIS/TEDS before the close of Phase I. Please check regularly to ensure all changes are accurately reflected in the Cohort application. Districts

⁴ For more guidance on enrollment practices for adult high school students, please consult Section 2.5 of the [2025-2026 Graduation Cohort Phase I Guide](#).

will have an opportunity to submit completion data for summer graduates during Phase II. More details about submitting completion information can be found in Section 5 of the [2025-26 Graduation Cohort Process Phase I Guide](#).

22. How should I update EIS/TEDS to document early graduates?

Early graduates – students who graduate before their expected spring graduation date and end their enrollment before the end of the school year – can be documented by accurately reporting **all four of the following components** in district SIS **by 9 p.m. CDT on June 25, 2026**:

1. The withdrawal code for the early graduate should be 12,
2. The listed graduation date (completion date) should be before the spring graduation date,
3. The completion period should be listed as “EA” (EIS submissions only)
3. The completion type should represent one of the following traditional high school diploma codes:
 - a. 1 - Traditional high school diploma
 - b. 11 - Foreign language waiver
 - c. 12 - Art waiver
 - d. 13 - Foreign language and art waiver

Districts should complete the same process for TISA graduates.

23. What is the difference between a “Regular Diploma” and a “Traditional High School Diploma?”

These two terms both refer to the standard high school diploma earned by most graduates throughout the state of Tennessee and can be therefore used interchangeably.

24. What completion code should be used for a student who took the HiSet exam?

The HiSet exam is a high school equivalency exam that is an alternative to the GED test. Therefore, students completing the HiSet should be given a completion code of 6. These students are considered non-graduates and are not eligible for removal from the cohort.

25. How should a district document a student in EIS/TEDS who is enrolled at an alternative school but will graduate from their original high school with a traditional high school diploma?

Per [Tenn. Code Ann. § 49-6-3402\(b\)](#), students who enroll at alternative high schools should be connected to a traditional high school (i.e., the “home school”) in the same district. Students should never be given a primary enrollment at an alternative high school; while a student is enrolled in an alternative school, they should maintain a secondary enrollment at the alternative school and a concurrent enrollment at their home school. All credits earned by alternative high school students should be transferred to and recorded in the traditional high school. After completing the requirements to earn a diploma, alternative high school students should be recorded as graduates at the home school. Failure to maintain these enrollment practices may result in an alternative school student being incorrectly counted as a non-graduate.

26. Can a student who is enrolled at an adult high school and graduates on time with a traditional high school diploma be counted in a district’s graduation rate?

For the purposes of calculating and reporting graduation rates, students at adult high schools are mapped back to the graduation cohort of the traditional high school the student most recently attended (i.e., their assigned cohort school). **Students who enroll at an adult high school in the same district as the assigned cohort school** may be re-enrolled at the assigned cohort school prior to the end of the school year and credited as graduates at the assigned cohort school. Districts should attach the student’s completion document to the student’s final enrollment at the assigned cohort school in order for that student to be credited appropriately in their graduation

rate file. **Students who enroll at an adult high school in a different district than the assigned cohort school** may not be counted as a graduate in any school's graduation cohort. Instead, these students will be removed from the graduation cohort by the department at the start of Phase II. For more information, please consult Section 2.5 of the [2025-26 Graduation Cohort Process Phase I Guide](#).

Submitting Withdrawal Information

27. Why are withdrawal code changes our district made in EIS/TEDS not reflected in the Cohort application?

The department updates the Cohort application data nightly during Phase I. Districts must enter or update withdrawal information in EIS/TEDS and wait until the correction loads (the next day) in the Cohort application before uploading withdrawal documentation. The last date for districts to enter and update withdrawal data in EIS/TEDS is by **9 p.m. CDT on June 4, 2026**, and the last date for districts to upload the required withdrawal documentation to the Cohort application is **by 9 p.m. CDT on June 5, 2026**. EIS/TEDS changes made after Phase I will not be reflected in the Cohort application. It is the district's responsibility to ensure the Cohort application has been updated with all changes reported to EIS/TEDS before the close of Phase I. Please check regularly to ensure all changes are accurately reflected in the Cohort application. More details about submitting withdrawal information and documentation during Phase I can be found in Section 6 of the [2025-26 Graduation Cohort Process Phase I Guide](#).

28. Which withdrawal codes require supporting documentation, and how can a district upload these documents?

Districts must upload supporting documentation for students withdrawn using codes 2, 5, 6, 8, 10, 11, and 17. Districts can upload required documentation using the **Attach** link feature. For a comprehensive list of adequate documentation for each eligible withdrawal code, please consult Section 6.2 of the [2025-26 Graduation Cohort Process Phase I Guide](#).

29. Can I submit withdrawal documentation for multiple students at one time?

To save time, districts may want to use the "Mass Upload" feature to upload documents for multiple students at a time using one click. To use this feature, districts should prepare a .zip file containing multiple PDF documents for each individual student. Within this zip file, individual documents should be named with the state student ID for the student that the document applies to. For instance, documentation for student John Smith who has a student ID of 1234567 should be named "1234567.pdf." After preparing this zipped file, districts can mass upload withdrawal documentation using the following steps:

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 "Mass Upload" button on the header at the top of the page.
6. Click "Choose File" to select the zipped file (prepared as discussed in the paragraph above).
7. Click "Upload" to complete document upload.

Note. The mass upload feature will return an error if any of the documents in the zipped folder are not named as a valid state student ID.

30. After withdrawal documentation is submitted, what is the timetable for review by the department?

The department reviews withdrawal documentation on a first-come, first-serve basis prioritizing documentation

for the current graduating cohort before documentation uploaded for later cohorts. Accordingly, department response time may vary depending on the cohort year of the student for whom documentation was uploaded. All withdrawal documentation submitted for students in the 2025-26 Cohort uploaded before the Phase I deadline **9 p.m. CT on June 5, 2026**, will be reviewed by the department by **June 12, 2026**. Any documentation for future cohorts will be reviewed as soon as possible. For more information on the Phase I timeline, please consult Section 1 of the [2025-26 Graduation Cohort Process Phase I Guide](#).

31. How does the department notify districts about withdrawal documentation that is denied?

When withdrawal documentation is denied, the district's designated Cohort contact receives an automatic email notification from the department with the student's ID number (the department does not notify districts when documentation is approved). Districts can view the status of all submitted withdrawal documentation on the district's Cohort Data page under the "status" column. Documents that have been reviewed will be marked "Approve" or "Deny" with an explanation; documents that have not yet been reviewed will have a blank status.

32. How should I update EIS/TEDS to reflect a student who withdrew to participate in Job Corps?

Students who withdraw to join Job Corps should be coded as 00 (dropout, under 18) or 01 (dropout, 18 and over). If students complete a traditional high school diploma during their participation during Job Corps, districts may appeal to have these students removed from their graduation cohort during Phase II. Please note that students that earn a GED, HiSET, or other equivalency diploma are not eligible to be removed from the graduation cohort. For more specific information regarding how to submit Phase II appeals and required documentation, districts should consult the 2025-2026 Graduation Cohort Phase II and III Appeals Guide, available in Summer 2026 on the Accountability [website](#) and the Accountability Application.

33. How should I update EIS/TEDS to reflect a student who withdrew to a Category I-SP school?

Students who are in transient care facilities or receiving short-term medical care may withdraw to enroll in a Category I-SP (Special Purpose) school approved by the State of Tennessee. These students should be given one of two different withdrawal codes depending on the affiliation of the school. For withdrawals to Category I-SP schools authorized by DCS, the student should be given a withdrawal code of 02; for withdrawals to all other Category I-SP schools, the student should be given a withdrawal code of 06 (approved in-state non-public). For more specific information regarding Category I-SP Schools, please consult the Non-Public Schools list, available on the Cohort Application.

34. How should I update EIS/TEDS to reflect a student who was placed in jail or in custody of the Department of Children's Services (DCS)?

Districts should use withdrawal code 2 for situations where a child is placed in the custody of DCS. If the district provides documentation on the Cohort application that the student has transferred to a DCS-approved school⁵ or institution that offers an educational program culminating in a traditional high school diploma, it can appeal to have the child removed from the graduating cohort. **If the documentation does not indicate that the student is receiving educational services while at the DCS institution, the request will be denied.** Withdrawal code 2 is **not** to be used for students placed in jail or prison. Instead, withdrawal code 11 should be used for students withdrawn under court order or other government placement, such as jail or prison. For more information about required documentation by withdrawal code, please refer to Section 6.2 of the [2025-26 Graduation Cohort Process Phase I Guide](#).

⁵ Please contact [TN Department of Children's Services](#) for more information about DCS approved schools and institutions.

35. What action should be taken by districts for students who withdrew to another school or district (codes 3 and 4) but are still showing in the Cohort application?

If a student has a withdrawal code of 3 or 4 and is still appearing in the original school's cohort, the student may not have completed the enrollment process at the receiving school, or there may be an enrollment error. If no subsequent enrollment appears in EIS/TEDS, the sending school should contact the receiving school to reconfirm enrollment.

36. How should I document an exchange student in the cohort who will not receive a diploma?

Students enrolled in a student exchange program who will not receive a diploma should be withdrawn using code 05 as an out-of-state transfer. After submitting the withdrawal code, districts should upload withdrawal documentation to the Cohort Application. For more information about required documentation for exchange students, please refer to Section 6.2 of the [2025-26 Graduation Cohort Process Phase I Guide](#).

37. What action should be taken by a district for a student who transferred to homeschool?

Students who enroll in home school may be given one of several withdrawal codes depending on the student's circumstances. Typically, students who withdraw and attend home school while remaining Tennessee residents should be given a withdrawal code of 10. For these students, a parent must sign (either physically or digitally) the official Intent to Homeschool [form](#) and the form must be uploaded on the Cohort application. However, if the student is enrolling in an in-state home-school umbrella program that is on the state's list of approved non-public schools, that student should be given a withdrawal code of 06.⁶ Alternatively, students who are moving out of state to begin home school in another state should be given a withdrawal code of 05. In all three cases, the form of documentation necessary to remove the withdrawn student from a school's graduation cohort is different. Please consult Section 6.2 of the [2025-26 Graduation Cohort Process Phase I Guide](#) for more information on required documentation for withdrawal codes 05, 06, and 10.

38. What action should be taken by a district that for a student who transfers to an online school?

Students who enroll in an online school may be given one of several withdrawal codes depending on the nature of the school (i.e., in-state vs out-of-state, public vs. non-public). Students who withdraw to an in-state public/charter online school should be given a withdrawal code of 03 (another district) or 04 (same district). Students who withdraw and enroll in an out-of-state public/charter online school should be given a withdrawal code of 05. Students who withdrew and enroll in an in-state non-public online school should be given a withdrawal code of 06. Students who withdrew to an out-of-state private online school while remaining Tennessee residents should be given withdrawal code of 17. Students who withdraw to an out-of-state private online school while changing their primary residence to a different state should be given a withdrawal code of 05. Please consult Section 6.2 of the [2025-26 Graduation Cohort Process Phase I Guide](#) for more information on required documentation for withdrawal codes 05, 06, and 17.

39. Would a picture of a student appearing to graduate classify as approved documentation to remove a student from a cohort?

No. According to federal guidelines, cohort withdrawal documentation must be official, written, and confirm student enrollment in an educational program leading to a regular (traditional high school) diploma and/or demonstrating that a student earned a regular (traditional high school) diploma. Students could participate in a completion ceremony and receive a certificate that is not a traditional high school diploma. A transcript or diploma

⁶ Students who are receiving curriculum from a home school curriculum provider but are not enrolled in a full educational program leading to a traditional high school diploma are not eligible for withdrawal under this code and should complete an intent-to-home school form. Please consult the [School Directory](#) for a list of approved non-public schools.

could qualify as approved documentation. For more information about required documentation by withdrawal code, please refer to Section 6.2 of the [2025-26 Graduation Cohort Process Phase I Guide](#).

40. Will the department accept withdrawal documentation signed by a student over the age of 18?

No. The department cannot accept any withdrawal documentation signed by a student, regardless of the student's age at time of withdrawal. For more information about federal requirements regarding withdrawal documentation, please refer to questions B-12 and B-13 of the [ESSA High School Graduation Rate Non-Regulatory Guidance](#).

Submitting a Cohort Change Request

41. How and when can schools and districts submit a cohort change?

Cohort Change requests can only be submitted and processed during **Phase I** as specified in Section 7 of the [2025-26 Graduation Cohort Process Phase I Guide](#). Districts should submit a cohort change request for the following issues:

- Incorrect Cohort Year
- Duplicate Student ID
- 9th Grade No-Show/District Enrollment Error
- Set Included in Cohort Value to "Y"

Any cohort changes submitted after the Phase I initial submission deadline of **June 5, 2026**, will be automatically denied. Districts must submit a [Graduation Cohort Change Request form](#) and attach a [Cohort Change Request Worksheet](#). Cohort Change Requests cannot be accepted via email. For more information on submitting Cohort Change Requests, including the submission process, timelines, and required documentation, please consult Section 7 of the [2025-26 Graduation Cohort Process Phase I Guide](#).

42. What should a district do if a student repeated a grade, and the district wants to include the student in a subsequent cohort?

This is not possible. [Federal law](#) (ESEA section 8101(25)(A)(i); 34 C.F.R. § 200.34(a)(2)) requires that the graduation cohort be constructed based on the year each student **first entered grade 9**. For example, if a student first entered grade 9 in the 2021-22 school year but was retained and repeated grade 9 during the 2022-23 school year, the student must remain in the YE9 (Year Entered Ninth Grade) 2021 cohort, per federal guidelines. Please note that this rule does not apply to students who repeat a grade *before* entering ninth grade for the first time. For instance, if a student entered grade 8 in 2020-21 but was retained and repeated grade 8 during the 2021-22 school year, the student would first enter grade 9 in 2022-23 and be expected to graduate in 2025-26 with the 2022 cohort. If, in this situation, this student's EIS enrollment automatically rolled over with the YE9 2021 cohort by accident, his or her district could submit a [Graduation Cohort Change Request form](#) to correct the student's cohort and complete the [Cohort Change Request Worksheet](#) following the instructions outlined in Section 7 of the [2025-26 Graduation Cohort Process Phase I Guide](#).

43. When can districts adjust the cohort year of students who are attending school in the United States for the first time after transferring in from another country's school system?

When enrolling a student transferring to the United States for the first time after previously attending school in another country, districts should make every effort to obtain accurate information regarding an international student's prior academic preparation and readiness and submit an appropriate value for the student's grade. However, the department understands that sometimes school districts are working with limited information regarding the academic experiences and preparedness of an international transfer, and that the educational

experiences in some out-of-country school systems are not easily comparable to that of students in the United States. For instance, a district may initially enroll an international transfer in tenth grade on day one, then, upon obtaining an accurate translation of the student's transcript, adjust the student's grade assignment and class schedule to ninth grade. In these cases, districts should submit a cohort change request to correct the student's cohort assignment as soon as possible and include an accurate translation of the student's ninth grade transcript. Please note that, in situations where an international student is placed in the accurate cohort initially but repeats a grade, that student is not eligible to be moved to another cohort.⁷ The department will carefully consider the student's course enrollment data in EIS/TEDS when considering the request; requests for students that have repeated courses may not be approved. For more information on submitting Cohort Change Requests, please consult Section 7 of the [2025-26 Graduation Cohort Process Phase I Guide](#).

44. What must be included in a district's letter for their no-show or duplicate ID request to be accepted?

For Cohort Change Requests to exclude students from a district's cohort in cases of 9th grade no show or duplicate ID, a letter from a school administrator on school letterhead is required as supporting documentation for the request before it can be approved.⁸ For 9th-grade no-show requests, the supporting letter must not merely indicate that student appears in the district's Potential Cohort Issues Report; it must attest that the student never attended school during grade 9 or higher in the district for a single day.⁹ For requests to remove a duplicate ID from the cohort, the supporting letter must clearly designate the active ID and the duplicate ID, and attest that the two IDs were, in fact, created for the same student. For more information on submitting Cohort Change Requests, please consult Section 7 of the [2025-26 Graduation Cohort Process Phase I Guide](#).

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⁷ Please see FAQ #40 for more information.

⁸ A letter is not required for other requests, like changing a student's cohort year.

⁹ A district may use a single letter for multiple no-show Cohort Change Requests.