



Department of Education

2025-26 Graduation Cohort Process: Phases II and II Guide

Data Verification and Appeals Guide for District Staff | June 2026



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Introduction

This document provides detailed guidance on required district data submission and data appeals tasks during Phases II and III of the 2025-2026 Graduation Cohort Process – the set of processes, timelines, and business rules implemented to finalize graduation rate related data for the 2025-26 graduating cohort and confirm the roster of TISA graduates for the 2025-26 graduating class.¹

It also provides a [timeline](#) for the final two phases of the cohort process, as well as general information on how the department calculates graduation rates. Cohort inclusion, completion information, and the TISA Roster are final by the end of Phase II of the Graduation Cohort Process. By the end of Phase III of the cohort process, which confirms the federal graduation rate, all cohort and graduation rate related information is **final** and no longer appealable (even when relevant in future Accountability and CCR Processes). For more information on this timeline, please consult [Section 1](#). The department will deny any district appeals submitted after the deadlines specified in [Section 1](#).

Key Updates for 2025-26

- Data for the 2025-26 Graduation Cohort will come from a combination of sources including both EIS and TEDS. For more information on how data will be sourced, please consult [Section 2.1.1](#).
- For the 2025-26 Cohort Process, the Cohort Application's STUDENT_KEY identifier will continue to reflect the student's Legacy SSID (the seven-digit number used to identify students in the EIS database). As such, all references to student ID in this document refer to a student's Legacy SSID number rather than their Ed-Fi ID².

¹ For more information on the difference between the Graduation Cohort and TISA graduates, please consult [Section 3](#).

² A student's Ed-Fi ID is the eight-digit combination of letters and numbers used to identify them in the TEDS database and is distinct from their Legacy SSID.

- Consistent with [Tenn. Code Ann. § 49-6-3402\(b\)](#), at the start of Cohort Phase II, the department will reassign students whose most recent high school enrollment is at an alternative school to the cohort of the most recent traditional high school they attended in the same district (if they are not assigned to that traditional school's cohort already). Students without a previous primary enrollment at a traditional high school in the same district as the alternative school will be assigned to the cohort of the largest high school in that district.
- To assist districts in the appeals process, the department will automatically apply 60-Day Reassignment Appeals on behalf of districts at the start of Phase II.
 - A Cohort Reassignment File including students whose accountable school or district has changed as a result of an Alternative or 60-Day Reassignment will be available on the Accountability application for districts to view.
 - Districts may submit appeals in cases of department reassignment errors. The department will only consider 60-Day Reassignment Appeals for students that dropped out of school without transferring to another educational program (in addition to meeting all other criteria required by [Tenn. Code Ann. § 49-1-601\(a\)](#)). For more information, please consult [Section 4.1.3](#).
- Consistent with [20 U.S.C. § 7801\(25\)\(B\)](#), the department will automatically remove students with an active Juvenile Detention Center (JDC) classification at the time of their most recent enrollment from the cohort at the start of Phase II. Districts should check the Cohort Reassignment File published in the Accountability Application at the start of Phase II to see a list of these students and submit appeals to exclude / include JDC students as necessary. For more information, please see [Section 4.2.1](#).
- The department will now provide preliminary dropout rate data for district preview during the Embargo Period. For dropout rate calculation and reporting, see [Section 2.3](#). For the file release timeline, please see [Section 6](#).

- The [Graduation Cohort Phases II and III FAQ](#) has been updated for 2025-26 to provide answers to common questions. Please reach out to TNEducation@tn.gov for all other questions related to the Cohort process not covered in the FAQ or in this document.

Section 1. Process Overview and Timeline

The graduation cohort process consists of three phases and an embargo period:

- **Phase I (February 17 - June 26):** Districts confirm Cohort inclusion / removal for all students and completion status for all fall and spring graduates.
- **Phase II (July 13 - August 14):** Districts confirm completion status for summer graduates and appeal assigned Cohort school ([eligible scenarios only](#)).
- **Phase III (August 24 – October 2):** Districts verify the federal graduation rate.
- **Embargo.** Cohort and graduation rate data are final while dropout rate data remains preliminary. All data files are available in the accountability application for district review and are under embargo until department news release (to be determined).

This section provides an overview of the timeline and required tasks for Phases II and III of the 2025-26 Cohort Process. Districts should complete all tasks **by 9 p.m. CDT** on the deadlines specified in this section. *Any inquiries submitted after the specified timeline for that task will be denied.*

1.1 Phase II Timeline and District Tasks

The second phase of the 2025-26 graduation cohort process **opens on July 13, 2026, and closes on August 14, 2026.**

During this window, districts shall complete the following three tasks:

1. Review graduation cohort and graduating class data.
2. Report summer graduates for the 2025-26 graduating cohort and 2025-26 graduating class in TEDS.
3. Submit appeals for appealable situations ([see Section 4.2.1](#)).

Districts should complete all Phase II tasks **by 9 p.m. CDT** on the deadlines specified in Table 1. *Any Phase II related inquiries submitted after the specified timeline will be denied.*

Table 1. Cohort Phase II Timeline

Phase II Window	Timeline
District Submission Window	July 13—31
Initial Response / TISA Roster Update	August 7
Remediation Window	August 10-12
Completion Information Deadline	August 13
Final Response / TISA Roster Update	August 14

After the district submission window closes, the department will review all documentation submitted by July 31 and approve or deny the submitted documentation. All decisions will be communicated by 9 p.m. CDT on **August 7**. Districts are encouraged to check the Accountability Application's File Downloads page and the director's email inbox for

- Phase II appeals decisions
- Cohort reassignments resulting from 60-day appeals

Districts will have the opportunity to correct any issues that resulted in the denial of Phase I documentation during the **remediation window** between August 10 and August 12. During this window, districts shall complete the following tasks:

- Resubmit appeals to correct denials if additional appropriate documentation is available.

The department will release an updated TISA graduate roster containing all members of the graduating class on the Accountability application on **August 7**. Districts should check:

- The Cohort Application to confirm that that graduation status for the cohort is reflected accurately
- The Accountability Application to confirm that graduation status for members of the graduating class is reflected accurately

Districts should review data on both platforms and update completion information for the 2025-26 graduating cohort and class in TEDS as appropriate. All completion information must be updated for summer graduates by **August 13**.

The department will review all remediation appeals submitted by August 12 and make final decisions by **August 14**. After this date, all decisions related to Phase II appeals tasks are final.

1.2 Phase III Timeline and District Tasks

The third phase of the 2025-26 graduation cohort process **opens on August 24, 2026, and closes on October 2, 2026**.

During this window, districts shall complete the following (2) tasks:

1. Review the federal graduation rate exclusion list (see [Section 5.1.1](#)).
2. Submit appeals for appealable situations (see [Section 5.2](#)).

Districts should complete all Phase III tasks **by 9 p.m. CDT on the deadlines** specified in Table 2. *Any Phase III related inquiries submitted after the specified timeline will be denied.*

Table 2. Cohort Phase III Timeline

Phase III Window	Timeline
District Submission Window	August 24—September 4
Initial Response	September 18
Remediation Window	September 21-25
Final Response	October 2

After the district submission window closes, the department will review all documentation submitted by September 4 and approve or deny the submitted documentation. All decisions will be communicated by 9 p.m. CDT on **September 18**. On this date, the director of schools will receive an initial response letter, which will also be uploaded on the Accountability application, along with the list of students excluded from the federal graduation rate.

Districts will have the opportunity to correct any issues that resulted in the denial of Phase I documentation during the **remediation window** between September 21 and September 25. During this window, districts shall complete the following tasks:

- Resubmit appeals to correct denials if additional appropriate documentation is available.

The department will review all remediation appeals submitted by September 25 and make final decisions by **October 2**. After this date, all decisions related to Phase III appeals tasks are final, and all cohort and graduation data are final.

Final Cohort data, including the Federal Graduation Rate and Tennessee Graduation Rate, will be uploaded on the Accountability application by October 2 for district review. Graduation rate data will be under embargo until the news release. Timeline for the Graduation Rate news release is to be determined.

Section 2. Graduation Rate Guidelines

Federal law³ 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 in the graduating cohort who earn a traditional high school diploma or an alternate academic diploma (AAD), including completion types 1, 8, 11, 12, or 13⁴, 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 2023 would be placed into the 2022 cohort and expected to graduate in spring 2026.

Applying these definitions to the 2026 graduating cohort, the cohort includes students who first entered grade 9 during the fall 2022 enrollment period. Graduates are students who completed high school with completion types 1, 8, 11, 12, or 13 by the end of summer 2026.

³ For more information on federal requirements regarding graduation rate calculations, please consult the [Every Student Succeeds Act High School Graduation Rate Non-Regulatory Guidance](#).

⁴ For more information on completion types, please see [Section 4.1.2](#).

2.1 Graduation Rate Data Sources

To determine a student's cohort membership and graduation status, the department relies on data submitted to EIS and TEDS from district SIS packages.

2.1.1 Cohort Data Sources—EIS vs. 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.

2.1.2 Sourcing Student Cohort Membership

A student's original cohort membership is sourced from enrollment data submitted to EIS/TEDS. Once a high school (9-12) enrollment is created for a student in either one of the two databases, the Cohort Application places the student in a graduation cohort corresponding to their first ninth grade year.⁵ Once a student has been

⁵ If a student has no ninth-grade enrollments in EIS or TEDS but has a high school enrollment in a higher grade (due to transferring in from another non-public and/or out-of-state school after entering ninth grade), the student will be placed in a

placed with a graduation cohort, their cohort membership cannot be changed except via a Cohort Change Request.⁶

2.2 Federal vs Tennessee Graduation Rates

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 (traditional high school) diploma with ***all required coursework in all subject areas*** or an alternate academic diploma (AAD). This means that students who receive a traditional high school 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](#)⁷. The distinction between the two is discussed in the following sections.

2.2.1 Federal Graduation Rate

When calculating the federal graduation rate, only students that complete ***all required coursework in all subject areas*** per the requirements of 20 U.S.C. § 7801(25) and 20 U.S.C. § 7801(43) will be included in the numerator of the federal

graduation cohort based on their implied ninth grade cohort year. For instance, a student with a 10th grade enrollment in 2023-24 would be placed in the 2025-26 graduation cohort with students that first entered 9th grade in fall of 2022.

⁶ For more information on Cohort Change Requests, please consult the [2025-26 Graduation Cohort Process Phase I Guide](#). Note that Cohort Change Requests cannot be submitted after Phase I of the Cohort Process.

⁷ For more information on Tennessee's graduation requirements, see SBE Rule [0520-01-03-.06](#).

graduation rate calculation. The [SBE's High School Policy 2.103](#) provides an alternative pathway for students with disabilities to earn a traditional high school diploma without completing upper-level mathematics and science courses. 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 traditional high school 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 traditional high school 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).

2.2.2 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 credits of math and three credits of science including extended courses (A/B courses) will continue to receive a traditional high school 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 CCR rate and the ACT/SAT participation rate⁸ for federal accountability purposes.

2.3. Dropout Rate

The dropout rate reflects 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 type⁹ (see Completion Type in [Section 4.1.2](#)) 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 (dropout, under 18), 1 (dropout, 18 and over), 3 (transferred to other Tennessee School System), or 4 (transferred to another School) in the most recent enrollment of the following school year *after* the anticipated graduation year of their cohort.

Note that, based on this definition, students who did not graduate in four years plus a summer but are still enrolled in school for a fifth year are not included in the dropout rate.

⁸ The CCR rate equals the number of graduates with CCR status divided by the number of students in the graduating cohort * 100. The ACT/SAT participation rate equals the number of graduates with a ***traditional high school diploma*** and a valid ACT/SAT score divided by the number of graduates with a traditional high school diploma * 100. For both rates, the count of graduates defined by the Tennessee graduate rate are used in the calculation.

⁹ For purposes of calculating the dropout rate, students with completion type 5 (No Diploma, Senior but did not complete) are considered as having no completion type, as this completion type indicates students who did not earn a completion document of any kind.

Important update. Dropout rate data is published in the [State Report Card](#) every year. Starting 2025-26, the department will release the preliminary dropout rate data files during cohort Phase III for district preview. Dropout rate data for the 2025-26 cohort relies in part on enrollment data from the following fall (i.e., fall 2026) to be finalized. The department will utilize the enrollment data from TEDS as of October 15, 2026, to update the dropout rate files, and the data will then be finalized and released on Data Downloads upon Graduation Rate news release (see [Section 6](#) for more information).

2.4. Student Group Graduation Rate Reporting

Graduation rates are calculated for all student groups, including:

- All Students
- Black, Hispanic, and Native American Students (BHN)
- English Learners (EL) with Transitional 1-4
- 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, however, a different method is applied. Namely, 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.

2.5 Cohort Attribution for Students at Adult and Alternative Schools

All public high schools in the state of Tennessee are eligible for a cohort and receive graduation rate data annually from the department except adult high schools and alternative schools. Per federal law¹⁰, all students who enter ninth grade must be included in the graduation cohort comprised of all other students who entered ninth grade in that year. Therefore, for purposes of calculating and reporting graduation rates, students at alternative schools and adult high schools are mapped back to the graduation cohort of the traditional high school the student most recently attended. Students who did not graduate with a traditional high school or AAD diploma on time¹¹ from adult high schools or alternative schools are counted as a non-graduate in the graduation cohort of the previous high school the student attended. Guidance for students who graduate from adult high schools and alternative schools is provided in the following sections.

2.5.1 Graduates of Alternative Schools

As stated in [Tenn. Code Ann. § 49-6-3402\(b\)](#),

Alternative schools and alternative programs shall be operated pursuant to rules of the state board of education pertaining to them, and instruction shall proceed as nearly as practicable in accordance with the instructional programs at the student's home school. All course work completed and credits earned in alternative schools or alternative programs shall be transferred to and recorded in the student's home school, which shall grant credit earned and progress thereon as if earned in the home school.

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

¹⁰ For more information on federal law regarding graduation rate calculations, please consult [20 U.S.C. § 7801\(25\)\(A\)\(i\)](#); [34 C.F.R. § 200.34\(a\)\(2\)](#).

¹¹ For the purposes of calculating the graduation rate, “on-time” means within four years and a summer of first entering ninth grade.

given 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. When a student transfers to a different district, the receiving district shall enroll the student in a home school first prior to enrolling them in an alternative 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, an alternative high school student should be recorded as a graduate at the home school. Failure to maintain these enrollment practices may result in an alternative school student being incorrectly counted as a non-graduate.

2.5.2 Graduates of Adult Schools in Same District as Cohort School

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 where the student most recently attended (i.e., assigned cohort school). Students who enroll at an adult high school in the same district as the assigned cohort school and **do not** graduate on-time are counted as non-graduates at the assigned cohort school. On the other hand, if these students receive a traditional high school or AAD diploma on-time, they 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.

2.5.3 Graduates of Adult Schools in Different District than Cohort School

Students who enroll at an adult high school in a different district than the assigned cohort school and **do not** graduate on-time are counted as non-graduates at the assigned cohort school in the sending district. If these students receive a traditional high school or AAD diploma on-time from the adult high school, they 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.

2.6 Students in Non-Public Programs

Some enrollments reflected in EIS/TEDS represent students who are not primarily enrolled in any of the Tennessee public schools. Students enrolled in the Education Savings Account (ESA) program or the Individualized Education Account (IEA) programs are not included in the graduation cohort. These students are automatically removed from the graduation cohort by the department at the start of Phase II.

Section 3. TISA Graduates Roster

During the 2025-26 Graduation Cohort Process, districts will not only verify the roster of students included in the 2025-26 Graduation Cohort but will also verify the roster of TISA graduates (i.e., students eligible for 2026 TISA High School Outcome Goal 1 Bonuses). The roster of TISA graduates includes all students in the 2025-26 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 that student's completion status. A graduating class, on the other hand, includes only students who received a traditional high school or alternate academic diploma (AAD) in that year, regardless of a graduating student's first year entering 9th grade. For a detailed overview of the differences between the 2025-26 Graduation Cohort and the 2025-26 Graduating Class, please consult Table 3.

Table 3. Graduating Cohort vs. Graduating Class

Dimension of Comparison	Graduating Cohort (2025-2026)	Graduating Class (2025-2026)
Purpose	Used in federal and state accountability	Used for calculating TISA outcomes bonuses
Membership	Includes all students that entered 9 th grade in 2022-23, regardless of completion status by the end of summer 2026	Includes all students who received a traditional high school diploma or an AAD during the 2025-26 school year (including summer 2026) regardless of their first year entering 9 th grade or number of years taken to complete high school
Handling of Early/Late Graduates	Includes students who entered grade 9 in 2022-23 and graduated early (i.e., prior to 2025-26)	Includes some students who entered grade 9 before 2022-23 and graduated late or who entered grade 9 after

Dimension of Comparison	Graduating Cohort (2025-2026)	Graduating Class (2025-2026)
		2022-23 and graduated early (in both cases, students must graduate in 2025-2026)
Handling of Alternative/Adult Students	Students enrolled at alternative schools and adult high schools are included in the cohort of the previous traditional high school in which they were most recently enrolled (i.e., home school)	Students who graduate from an adult high school 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 TEDS. To count as a TISA graduate, a student must have a completion document with a completion type of 1 (Traditional High School Diploma), 8 (Alternate Academic Diploma), 11 (Traditional High School Diploma with Foreign Language Waiver), 12 (Traditional High School Diploma with Fine Arts Waiver), or 13 (Traditional High School Diploma with Foreign Language and Fine Arts Waiver) attached to his or her enrollment for the 2025-2026 school year. Additionally, this completion document must be dated between August 1st, 2025, and July 31st, 2026. Students with other completion types, with completion dates outside of this range, or with completion documents attached to another enrollment year other than 2025-2026 will not be counted as TISA graduates.

Districts shall ensure that student completion date and completion type information for all students who graduated during the 2025-26 school year is entered correctly in TEDS during Cohort Phase I (Fall and Spring Graduates) and Cohort Phase II (Summer Graduates).¹² By the end of Phase II, the TISA graduate

¹² All completion data related to the 2025-26 graduating class will be sourced from TEDS. For more information on what completion data relevant to the 2025-26 cohort process will be sourced from EIS vs TEDS, please consult [Section 2.1.1](#).

roster is final and can no longer be appealed during subsequent phases of the CCR data verification process. See [Section 1](#) for required tasks in Phase II related to finalizing the TISA graduate roster.

Section 4. Phase II District Tasks

The second phase of the 2025-26 graduation cohort process **opens on July 13, 2026, and closes on August 14, 2026**. Districts should complete all Phase II tasks **by 9 p.m. CT** on the deadlines specified in [Table 1](#). *Any new Phase II related inquiries submitted after the specified deadlines will be denied.*

The following sections provide an overview of the required data review and submission tasks ([Section 4.1](#)) and appealable issues ([Section 4.2.1](#)) during Phase II, as well as the procedures for submitting a Phase II appeal ([Section 4.2.3](#)).

4.1 Data Review and Submission Tasks

The following section contains information regarding data review and data submission tasks for districts to complete during Phase II.

4.1.1 Reviewing Cohort / Graduating Class Data

Throughout Phase II of the Cohort Process, districts should review their graduation cohort and graduating class data to identify discrepancies between department data and their list of expected graduates and should submit updates accordingly. The following subsections discuss the two main ways districts can review their data during Phase II.

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 these steps:

1. Navigate to the [Cohort application](#) or log in through Single Sign On.
2. Navigate to the Cohort Data page.
3. Click the “Show Data” button.
4. Select the desired graduation cohort year from the drop-down menu (e.g., 2025-2026)
5. Click the “Download CSV File” link.

Districts should filter this file for included students¹³ who have completion types other than 1, 8, 11, 12, or 13 (see Completion Type in [Section 4.1.2](#)). 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. If students are credited incorrectly, districts should update their completion data. For more information on updating completion data, please consult [Section 4.1.2](#).

Reviewing the TISA Graduate Roster

While the Cohort Application should be the primary source for verifying a district's graduation cohort (see [Reviewing Cohort Information](#)), districts are also responsible for verifying their graduating class (see [Section 3](#) for more information on the difference between the graduation cohort and graduating class). Districts can verify the graduating class by reviewing their TISA Graduate Roster.

Throughout the Phase II window, districts should submit completion information for all students who graduated in summer 2026, regardless of when that student entered 9th grade. On the first day of the Phase II window, the department will release an updated roster of all students credited as TISA Graduates to the Accountability Application's File Downloads page. This roster will contain all students who are credited as having received a traditional high school diploma or an AAD during the 2025-26 school year regardless of the year the student first entered ninth grade.

Districts should check this roster to verify that all students expected to be counted as part of the 2025-26 Graduating Class are included and update completion

¹³ Students are included in the cohort if: 1) they have a value of "Y" in the INCLUDED_IN_COHORT column or 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 withdrawal documentation approval.

information in EIS accordingly. For more information on updating completion information, please consult [Section 4.1.2](#).

4.1.2 Entering Summer Graduate Information

Throughout Phase II, districts should submit completion information for all summer graduates in the 2025-2026 graduation cohort and graduating class.¹⁴

The department updates the Cohort application data nightly during Phases I and II. Districts must enter or update completion information in their SIS package and wait until the correction loads the next day before seeing it reflected in the Cohort application. The deadline for districts to enter and update completion data for summer graduates is by **9 p.m. CDT on August 13, 2026**.

All completion information for students who graduated during the 2025-26 school year is sourced from TEDS. For members of the 2025-26 graduation cohort who graduated before the 2025-26 school year began, completion data is sourced from EIS.

End of service data submitted from districts' SIS packages must contain the following pieces of information in order to be accepted:

1. Completion type
2. Completion date
3. Completion period (this data field only exists in EIS and is not required in TEDS)

Important. Failure to enter the correct completion document date may cause an error and prevent the data from loading correctly into the Cohort application.

The following sections provide guidance for ensuring that students are appropriately credited in each of these fields.

¹⁴ See [Section 3](#) for more information on the difference between the graduation cohort and graduating class.

Completion Type

Table 4 shows the completion types used to identify what completion code students in the cohort should receive.

Table 4. Completion Types and Codes

Document Code	Completion Document Short Description
1	Traditional High School Diploma
3	Special Education Diploma and did not take alternate assessments
5	No Diploma, Senior but did not complete
6	GED ¹⁵
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	Traditional High School Diploma with Foreign Language Waiver
12	Traditional High School Diploma with Fine Arts Waiver
13	Traditional High School Diploma with Foreign Language and Fine Arts Waiver

To be credited as cohort graduate, the completion document must be type 1, 8, 11, 12, or 13 and must be attached to the student's most recent traditional (i.e., primary, non-alternative, non-adult) enrollment. To be credited as a TISA graduate, the completion document must be type 1, 8, 11, 12, or 13 and must be attached to a primary enrollment from the 2025-26 school year.

Summer graduates ***should not*** have a new enrollment for summer school. This will create an error and not allow for the student's completion information to be pulled

¹⁵ 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.

from EIS/TEDS into the Cohort application during nightly updates. Completion documents for summer graduates should be attached to the most recent primary enrollment from the preceding school year (e.g., 2025-2026 for a summer 2026 graduate).

Completion Date

Summer graduates must have a completion document date **AFTER** the end of the spring term but **prior to the Attendance Start** date of the following school year. To be included in the 2025-2026 TISA Roster, a student's completion date must fall between August 1, 2025, and July 31, 2026.

Completion Period

For completion information from the 2025-26 school year (submitted to TEDS), designating a completion period is not necessary, as that field does not exist in TEDS.

Important! It is essential to enter completion information for summer graduates before **9 p.m. CT August 13, 2025**. Any student without a completion code who was not previously removed from the cohort will be counted as a non-graduate.¹⁶

4.1.3 Review Cohort Reassignment File

At the start of Cohort Phase II, the department will release the Cohort Reassignment file to the Accountability Application's File Downloads page containing all students who were reassigned to or from the cohort of a high school due to either

- 1) Having an improper alternative school enrollment pattern or
- 2) the implementation of the 60-Day Reassignment Rule

¹⁶ Please note that students with a withdrawal code of 12 (early graduate) who lack a completion type, completion date, and completion period will be credited as non-graduates.

This file will also include a third tab listing all students that were excluded from the district's cohort as a result of having an active JDC classification at the time of their final enrollment.

During Phase II, districts should review this file and submit appeals as necessary. There are various data tabs included in the Cohort Reassignment file reflecting these three scenarios; each is discussed in detail in the following section.

Alternative School Student Reassignment

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.¹⁷ Students who enroll at alternative schools should be given an enrollment type of "S" (service) at the alternative school and should maintain a concurrent enrollment at the home school with a type of "P" (primary) for the entire duration of their enrollment at the alternative school.

At the start of Cohort Phase II, the department will reassign all students from the 2025-26 cohort whose most recent enrollment is at an alternative school to the cohort of the traditional high school that the student most recently attended in the same district as that alternative school. If the student does not have any traditional high school enrollment records in the same district as the alternative school, the department will reassign these students to the largest high school within the alternative school's district.

All students moved as a result of this process will be listed in their district's Cohort Reassignment File. If, after reviewing their file, a district has evidence that one or more of the students that they received as the result of an alternative school reassignment should have been assigned to the cohort of another Tennessee public school, the district may appeal to have that student moved. For more information on submitting an alternative school cohort reassignment appeal, please consult [Section 4.2](#).

¹⁷ When a student transfers to a different district, the receiving district shall enroll the student in a "home school" first prior to enrolling them in an alternative school.

60-Day Reassignment

In general, students count in the cohort of the district and school in which they were most recently enrolled. However, [Tenn. Code Ann. § 49-1-601\(a\)](#) allows for students 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 to be assigned to the school in which the student was enrolled for the greatest proportion of days across grades 9-12.¹⁸

At the start of Cohort Phase II, the department will reassign students in the 2025-26 cohort who meet the 60-Day Reassignment criteria denoted in this section. All students moved as a result of this process will be listed in a district's Cohort Reassignment File. 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 information on submitting a 60-Day appeal, please consult [Section 4.2](#).

Important Update. The department will no longer consider a student with final withdrawal codes besides 0 or 1 (e.g., a final withdrawal code of 2, 3, 4, 5, 6, 8, 10, 11, or 17) for a 60-day reassignment. 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).

Juvenile Detention Center (JDC) Students

Districts should maintain accurate student classification tags for all students at a Juvenile Detention Center (JDC) following the guidelines outlined in the [Education of Incarcerated Youth FAQ](#) and [Juvenile Justice and Incarcerated Youth Overview](#).

¹⁸ For more information on 60-Day Business rules, please consult [Appendix A](#).

Specifically, districts should ensure that start and end dates on a JDC student's classification tag accurately indicate the dates the student began and ended their incarceration at the JDC. Districts should only leave a student's classification active / open (no end date) in cases where the student remained incarcerated at the JDC for the entire duration of the student's enrollment.

All students in the 2025-26 cohort whose final enrollment had an active JDC classification will be removed from the graduation cohort by the department at the start of Phase II consistent with [20 U.S.C. § 7801\(25\)\(B\)](#). Districts should check the Cohort Reassignment File at the start of Phase II to see the list of students that were removed and make sure students whose last enrollment was at a JDC center were excluded from the graduation cohort.

If, after reviewing this file, a district believes that a student was excluded from their cohort in error or that a student that should have been excluded was not excluded, it can submit a Phase II appeal. For more information on submitting a JDC appeal, please consult [Section 4.2](#).

4.2 Data Appeals

The following section provides information regarding appealable issues during Phase II, as well as procedures for submitting Phase II appeals.

4.2.1 Appealable Issues and Required Documentation

During Phase II, districts can submit appeals for the following situations.

60-Day Reassignment Appeal

At the start of Cohort Phase II, the department will release the Cohort Reassignment File to the Accountability Application. This file contains all students who left and/or entered a district's cohort as result of a 60-Day Reassignment (for more information, see [Section 4.1.3](#)). 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.

Required Documentation: The district should provide official transcript and attendance documentation that justifies the student's reassignment, along with a detailed explanation of why the student's reassignment was incorrect. Before submitting an appeal, districts should consult the department's business rules for a 60-day reassignment. For more information on 60-Day Reassignment business rules, please consult [Appendix A](#).

Alternative School Reassignment Appeal

At the start of Cohort Phase II, the department will release the Cohort Reassignment File to the Accountability Application. This file contains all students who left or entered a district's cohort as result of alternative school reassignment (for more information, see [Section 4.1.3](#)).

If, after reviewing this file, a district has evidence that one or more of the students that they received as the result of an alternative school reassignment should have been assigned to the cohort of another Tennessee public school, the district may appeal to have that student moved.

Required Documentation: The district must provide a letter from an administrator at the home school the alternative student should have been reassigned to substantiating that their school was the student's home school while the student was enrolled in alternative school. The appeal must clearly indicate the name of the home school as well as the Tennessee public school district in which it was located. In addition, the district must provide a transcript demonstrating that all credits earned by the student at the alternative school were recorded at the alternative school to which the student should be reassigned.

Appeals to move a student to the cohort of an alternative school or adult school will not be accepted. For more information, please consult [Section 2.5](#).

Juvenile Detention Center (JDC) Students

At the start of Cohort Phase II, the department will release the Cohort Reassignment File to the Accountability Application. This file contains all students whose final enrollment had an active JDC classification and who were consequently

removed from the graduation cohort by the department at the start of Phase II (for more information, see [Section 4.1.3](#)).

If, after reviewing this file, a district believes that a student was excluded from their cohort in error or that a student that should have excluded was not excluded, it can submit a Phase II appeal.

Required Documentation: The district must provide an explanation of their appeal along with official documentation from the JDC confirming the start and end (if applicable) of a student's incarceration.

Student Completed Diploma Program at Adult School

Students who earn a traditional high school or alternate academic diploma at an adult high school in the *same* district as their assigned cohort school before the spring of their expected graduation year may be re-enrolled at their cohort school and count as a graduate in accordance with the instructions outlined in [Section 2.5.2](#).

Students in the 2025-26 cohort who earn a traditional high school diploma or alternate academic diploma at an adult high school in a *different* district than their assigned cohort school will be automatically excluded from the traditional school's cohort by the department at the start of Phase II. Districts should check the Cohort Application at the start of Phase II to make sure adult high school students who have graduated are credited appropriately.

If a district has evidence that a student who is still assigned to the cohort of a traditional school in their district and whose last enrollment was at an adult high school completed a traditional high school diploma, the district can submit an appeal during the Phase II submission window to remove that student from the cohort.

Required Documentation: The district must provide documentation confirming the student earned a traditional high school or alternate academic diploma on time (i.e. a copy of the diploma or official transcript denoting diploma status).

Students Enrolled for Special Education Services Only

Districts should enroll students that are only enrolled to receive special education services at their district's special education service school.

All students in the 2025-26 cohort whose final enrollment at is at a special education shell school will be removed from the graduation cohort by the department at the start of Phase II. Districts should check the Cohort Application at the start of Phase II to make sure students whose last enrollment was solely for the purpose of receiving special education services are excluded from the graduation cohort.

If, at the start of Phase II, a student whose last enrollment in Tennessee public schools was to receive special education services only is still included in the cohort, the district can submit an appeal during the Phase II submission window to remove that student from the cohort.

Required Documentation: The district must provide documentation confirming the student was enrolled in a nonpublic school on a date concurrent with or following their most recent enrollment in EIS/TEDS (i.e. a copy an official transcript or official confirmation on nonpublic school letterhead confirming student enrollment).

Students Participating in Non-Public Programs

Some enrollment entries in EIS/TEDS represent students who are not currently enrolled in public school, but are instead attending a nonpublic school via their involvement in a state program like the Education Savings Account (ESA) program or the Individualized Education Account (IEA) program. Districts should enroll students in the ESA program in their district's ESA shell school and give students in the IEA program an active IEA student classification.

All students in the 2025-26 cohort whose final enrollment at is at an ESA shell school or who have an active IEA classification will be removed from the graduation cohort by the department at the start of Phase II. Districts should check the Cohort Application at the start of Phase II to make sure students whose last enrollment represents participation in a nonpublic program are excluded from the graduation cohort.

If, at the start of Phase II, a student whose last enrollment involved participating in the ESA or IEA program is still included in the cohort, the district can submit an appeal during the Phase II submission window to remove that student from the cohort.

Required Documentation: The district must provide documentation confirming the student was enrolled in a nonpublic school on a date concurrent with or following their most recent enrollment in EIS/TEDS (i.e. a copy an official transcript or official confirmation on nonpublic school letterhead confirming student enrollment).

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. For instance, if the department approved a student's withdrawal from the graduation cohort during Phase I, but the student is still showing as `included_in_cohort = "Y"` in the Cohort Application during Phase II, the district may submit a department error appeal.

Required Documentation: 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., excluding a student from the cohort; moving students from the current cohort to next year's cohort; approved appeals shown in the initial or final response letters).

System Error

Districts can submit appeals when a system error that is not resolvable on the district's end results in student withdrawal data failing to process to the Cohort Application in time for the Phase I submission deadline.

Important. When a system error occurs, districts should email DT.Support@tn.gov immediately to resolve the issue and simultaneously notify the department of the ongoing issue via the TNED.Graduates@tn.gov inbox.

Required Documentation: A copy of the district's correspondence with DT.Support@tn.gov and TNED.Graduates@tn.gov as well as a screenshot of any submission error messages received *must* be submitted with the district's appeal as

documentation. Both pieces of required documentation must be dated / time stamped prior to the relevant Phase I deadline in order for the appeal to be accepted.

4.2.2 Non-Appealable Issues

Non-appealable Cohort issues during Phase II include, but are not limited to, those specified in this section:

- **Attendance Data:** The deadline to update attendance data (e.g., forgot to include and/or remove student absences) was by the end of Phase I.
- **Cohort Change Requests:** The deadline to submit a request to change a student's cohort year or remove 9th grade no-show students from the cohort was June 5, 2026.
- **Completion Data:** The deadline to enter completion information for fall and spring graduates was June 23rd, 2026
- **Demographic Data:** The deadline to update demographic data (e.g., race/ethnicity, year entered grade 9, economically disadvantaged status, disability status, English learner status, etc.) was the end of Phase I.
- **Withdrawal Documentation:** The deadline to input withdrawal codes and upload withdrawal documentation for eligible students was June 5, 2026.

4.2.3 Appeals Submission Process

Districts must complete the following steps for their Phase II appeals to be reviewed:

- 1) Complete the Cohort Phase II Appeals Submission Worksheet (available on the [Cohort Application](#)):
 - a. Complete all required tabs of the worksheet, including:
 - i. Contact Info
 - ii. District Appeals
 - b. Complete a full entry for all students being appealed in the worksheet's District Appeals tab. For more detailed information on

how to complete the worksheet, see the [instructions](#) in the following section.

- 2) Save the worksheet as an Excel file with the naming convention **“###_Appeals_Submission_Worksheet”** where ### is your district's number.
- 3) Compile supporting documentation for all appealed records.
 - a. Consult [Section 4.2.1](#) for appropriate supporting documentation for each of the appealable situations.
 - b. Compile supporting documentation into a single PDF file ordered by student State ID Number.
 - c. Save supporting documentation as a single PDF file with the naming convention **“###_SupportingDocumentation”** where ### is the district number.
 - d. Any appeals without supporting documentation for the appealed students will be denied automatically.
- 4) Submit the worksheet and the supporting documents using the [2025-26 Graduation Cohort Phase II Appeals Form](#).

The steps of the Phase II submission process are discussed in detail in the following sections.

Completing the Phase II Worksheet

Please follow all directions listed in this section very closely to support the timely and accurate resolution of the appeals in question. Any questions related to the Cohort process should be directed to TNED.Graduates@tn.gov.

- 1) Download the Cohort Phase II Appeals Submission Worksheet (available on the [Cohort Application](#)).
- 2) Fill out the “Contact_Info” tab.
 - a. Enter a valid date in cell B2 (format: MM/DD/YYYY).
 - b. Enter your district number in cell B3.

- i. This should automatically populate your district name, director's name, and director's email address.
 - ii. Contact the department at TNED.Graduates@tn.gov if any of the information that auto-populates is incorrect.
 - c. Enter the name of the person who serves as the point of contact for graduation cohort data in cell B7.
 - d. Enter the email address of the graduation cohort point of contact in cell B8.
 - e. Enter the phone number for the graduation cohort point of contact in cell B9.
 - f. Enter the phone numbers without symbols; the numbers will automatically format.
 - g. Enter the appropriate phone extension in cell D9, if applicable.
- 3) Fill out the "District_Appeals" tab.
- a. Enter the first student's state ID number into cell A2.
 - i. If you have correctly completed the "Contact_Info" tab, your district's number and name will automatically fill in.
 - b. Enter the school number for the first student in cell D2.
 - i. You can find the school number in the Cohort application and downloadable files.
 - c. Enter the student's last name in cell E2.
 - d. Enter the student's first name in cell F2.
 - e. Select the reason for the appeal from the dropdown menu in cell G2.
 - i. Only appeals related to one of the appealable issues outlined in [Section 4.2.1](#) will be accepted
 - f. Enter an explanation of the appeal in cell H2, highlighting the details of the situation and citing relevant guidance documents as needed.
 - i. Repeat steps a–f for any remaining students.

- 4) Save the Appeals Submission Worksheet Excel file.
 - a. Save the file using the following naming convention:
"###_Appeals_Submission_Worksheet" where "###" is your district number.

Phase II Submission Form

All Phase II appeals must be submitted using the [2025-26 Graduation Cohort Phase II Appeals Form](#). The person submitting the appeals form must have an Orion/SSO account to submit the form. Districts will need to provide the following information when submitting the form:

- 1) District Number
- 2) District Name
- 3) Name and Email Address of Person Submitting Form
- 4) Director of Schools Name
- 5) Director of Schools Email
- 6) Cohort Phase II Appeals Submission Worksheet
 - a. The worksheet must be submitted as an Excel file with the naming convention **"###_Appeals_Submission_Worksheet"** where ### is the district number.
- 7) Supporting Documentation
 - a. Documentation must be submitted as a single pdf file ordered by student State ID with the naming convention **"###_SupportingDocumentation"** where ### is the district number.
 - b. **Important:** Documentation must be provided for each student being appealed. Failure to include supporting documentation will result in a denial.

Districts must submit all appeals with all required documentation before the deadlines outlined in Table 1. Any appeals and documentation submitted past the timeline will be denied. If you need assistance submitting the form, please consult

the Microsoft Form Login and Troubleshooting Guide (see [Appendix B](#)) or email TNED.Graduates@tn.gov.

4.2.4 Appeals Remediation Window

The department will review all Phase II appeals submitted by the deadline outlined in [Table 1](#) and provide a response. During the remediation window, the district shall review the initial appeals response letter and resubmit the worksheet and the supporting documents, as appropriate, for denied appeals.

Districts should repeat the same process as described in [Section 4.2.3](#) only for denied records for which the district has new documentation to support a reversal of the appeals decision. There is no need to resubmit previously approved appeals. Totally new appeals cases that were not appealed before the initial Phase II deadline will be denied.

4.3 Phase II Final Checks

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

- 1) Did the district submit completion information for summer cohort graduates and verify that the information loaded correctly into the Cohort application?
- 2) Did the district submit completion information for summer TISA graduates and verify the TISA graduate roster released on July 7th?
- 3) Did the district review the Cohort Reassignment file released to the Accountability Application's File Downloads page at the start of Phase II and submit appeals as necessary?
- 4) Did the district submit appeals for all appealable scenarios (see [Section 4.1.2](#))?

Section 5. Phase III District Tasks

The third phase of the 2025-26 graduation cohort process ***opens on August 24, 2026, and closes on October 2, 2026***. Districts should complete all Phase III tasks ***by 9 p.m. CT*** on the deadlines specified in [Table 2](#). *Any new Phase III related inquiries submitted after the specified deadlines will be denied.*

The following sections provide an overview of the data review tasks ([Section 5.1](#)) and appealable issues ([Section 5.2.1](#)) during Phase III, as well as the procedures for submitting a Phase III appeal ([Section 5.2.3](#)).

5.1 Data Review Tasks

The following section contains information regarding the main district data review task to complete during Phase III (reviewing the district's exclusion list file).

5.1.1 Reviewing the Exclusion List File

Students with a traditional high school diploma must also ***complete all required coursework in all subject areas*** to be counted as graduates in the federal graduation rate calculation (see [Section 2.2](#) for more information).

Using enrollment and student transcript data from EIS/TEDS, the department will identify an ***exclusion list*** comprised of students in the graduation cohort who earned a traditional high school diploma but must be removed from the numerator of the federal graduation rate calculation per federal guidelines. The exclusion list will include any students who earned a traditional high school 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\(13\)\(a\)](#).¹⁹

¹⁹ Students who initially took Math or Science exemption courses for special education students but subsequently completed the higher-level Math and Science credits normally required for a traditional high school diploma will not be included in the exclusion list.

To construct the exclusion list, the department will start with a list of traditional high school diploma graduates in the 2025-26 cohort. Then, the department will use course transcript and enrollment data from EIS/TEDS to remove all students that have completed both higher-level math (i.e., Algebra II, Integrated Math III, or a college-level substitute) and higher-level science (i.e., Chemistry, Physics, or a college-level substitute).²⁰

At the start of Phase III, districts will be able to download their exclusion list from the Accountability application. Districts should carefully review the exclusion list and confirm that it matches their records. In case of discrepancy, districts should submit appeals as needed (see [Section 5.2](#) for information on how to submit a Phase III appeal).

5.2 Data Appeals

The following section provides information regarding appealable issues during Phase III, as well as procedures for submitting Phase III appeals.

5.2.1 Appealable Issues and Required Documentation

During Phase III, districts can submit appeals for the following situations:

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. For instance, if the department approved a student's removal from the graduation cohort during Phase II, but the student is still showing as `included_in_cohort = "Y"` in the Cohort Application during Phase III, the district may submit a department error appeal.

Required Documentation: 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., excluding a student from the cohort; moving students from

²⁰ For more information on state requirements for mathematics and science as well as approved substitutions, please consult [SBE Policy 3.103](#).

the current cohort to next year's cohort; approved appeals shown in the initial or final response letters).

Federal Graduation Rate Appeal

At the start of Phase III, districts will be able to download their exclusion list from the Accountability application (see [Section 5.1.1](#) for more information). This list will include students that are counted as graduates in the Tennessee graduation rate but are currently being counted as non-graduates in the federal graduation rate.²¹ Districts should carefully review the exclusion list and confirm that it only includes students who did not complete all required coursework in mathematics and science and utilized exemptions from required coursework provided by [SBE Rule 0520-01-03-.06\(12\)\(c\)](#) and [SBE Rule 0520-01-03-.06\(13\)\(a\)](#).²² In the case of a discrepancy between the exclusion list and district records, districts should submit appeals as needed.

Required Documentation. When submitting an appeal, districts must provide an official student transcript for each appeal case. The transcript must show the following information:

- District name
- School name
- Student name
- Course names
- Course codes
- Credits earned

²¹ For more information on the difference between the Tennessee graduation rate and the federal graduation rate, please consult [Section 2.2](#).

²² Students who took Math or Science exemption courses for special education students but subsequently completed all Math and Science credits normally required for a traditional high school diploma will not be included in the exclusion list.

Important. Districts should highlight the math and science courses on the student's high school credits used to satisfy SBE's upper-level mathematics and science requirements (for example, Algebra II for Math and Chemistry/Physics for Science).

Students who enrolled in a mathematics or science course but did not receive full credit for that required course are not eligible for appeals. Any appeal without an official transcript will be automatically denied.

5.2.2 Non-Appealable Issues

Non-appealable Cohort issues during Phase III include, but are not limited to, all of the non-appealable issues listed in [Section 4.2.2 \(Phase II Non-Appealable Issues\)](#), as well as new non-appealable issues listed in this section:

- **Cohort Reassignment Appeals:** The deadline to submit 60-Day and Alternative Reassignment appeals was July 31st, 2026
- **Completion Data (Summer Graduates):** The deadline to submit completion information for summer graduates was August 13, 2026, respectively

5.2.3 Appeals Submission Process

Districts must complete the following steps for their Phase III appeals to be reviewed:

- 1) Complete the Cohort Phase III Appeals Submission Worksheet (available on the [Cohort Application](#)):
 - a. Complete all required tabs of the worksheet, including:
 - i. Contact Info
 - ii. District Appeals
 - b. Complete a full entry for all students being appealed in the worksheet's second tab. For more detailed information on how to complete the worksheet, see the [instructions](#) in the following section.
- 2) Save the worksheet as an Excel file with the naming convention "**###_Appeals_Submission_Worksheet**" where ### is your district's number.

- 3) Compile supporting documentation for all appealed records.
 - a. Consult [Section 5.2.1](#) for appropriate supporting documentation for each of the appealable situations.
 - b. Compile supporting documentation into a single PDF file ordered by student State ID Number.
- 4) Save supporting documentation as a single PDF file with the naming convention “**###_SupportingDocumentation**” where ### is the district number.
 - a. Any appeals without supporting documentation for the appealed students will be denied automatically.
- 5) Submit the worksheet and the supporting documents using the [2025-26 Graduation Cohort Phase III Appeals Form](#).

The steps of the Phase III submission process are discussed in detail in the following sections.

Completing the Phase III Worksheet

Please follow all directions listed in this section very closely to support the timely and accurate resolution of the appeals in question. Any questions related to the Cohort process should be directed to TNED.Graduates@tn.gov.

- 1) Download the Cohort Phase III Appeals Submission Worksheet (available on the [Cohort Application](#))
- 2) Fill out the “Contact_Info” tab.
 - a. Enter a valid date in cell B2 (format: MM/DD/YYYY).
 - b. Enter your district number in cell B3.
 - i. This should automatically populate your district name, director’s name, and director’s email address.
 - ii. Contact the department at TNED.Graduates@tn.gov if any of the information that auto-populates is incorrect.
 - c. Enter the name of the person who serves as the point of contact for graduation cohort data in cell B7.

- d. Enter the email address of the graduation cohort point of contact in cell B8.
 - e. Enter the phone number for the graduation cohort point of contact in cell B9.
 - i. Enter the phone numbers without symbols; the numbers will automatically format.
 - f. Enter the appropriate phone extension in cell D9, if applicable.
- 3) Fill out the "District_Appeals" tab.
- a. Enter the first student's state ID number into cell A2.
 - i. If you have correctly completed the "Contact_Info" tab, your district's number and name will automatically fill in.
 - b. Enter the school number for the first student in cell D2.
 - i. You can find the school number in the Cohort application and downloadable files.
 - c. Enter the student's last name in cell E2.
 - d. Enter the student's first name in cell F2.
 - e. Select the reason for the appeal from the dropdown menu in cell G2.
 - i. Only appeals related to one of the appealable issues outlined in [Section 5.2.1](#) will be accepted
 - f. Enter an explanation of the appeal in cell H2, highlighting the details of the situation and citing relevant guidance documents as needed.
 - g. Repeat steps a–f for any remaining students.
- 4) Save the Appeals Submission Worksheet Excel file.
- a. Save the file using the following naming convention: **"###_Appeals_Submission_Worksheet"** where "###" is your district number.

Phase III Submission Form

All Phase III appeals must be submitted using the [2025-26 Graduation Cohort Phase III Appeals Form](#). The person submitting the appeals form must have an Orion/SSO account to submit the form. Districts will need to provide the following information when submitting the form:

- District Number
- District Name
- Name and Email Address of Person Submitting Form
- Director of Schools Name
- Director of Schools Email
- Cohort Phase III Appeals Submission Worksheet (available on the [Cohort Application](#))
 - The worksheet must be submitted as an Excel file with the naming convention “**###_Appeals_Submission_Worksheet**” where ### is the district number.
- Supporting Documentation
 - Documentation must be submitted as a single pdf file ordered by student State ID with the naming convention “**###_SupportingDocumentation**” where ### is the district number.
 - **Important:** Documentation must be provided for each student being appealed. Failure to include supporting documentation will result in a denial.

Districts must submit all appeals with all required documentation before the deadlines outlined in [Table 2](#). Any appeals and documentation submitted past the timeline will be denied. If you need assistance submitting the [form](#), please consult the Microsoft Form Login and Troubleshooting Guide (see [Appendix B](#)) or email TNEd.Graduates@tn.gov.

5.2.4 Appeals Remediation Window

The department will review all Phase III appeals submitted by the deadline outlined in [Table 2](#) and provide a response. During the remediation window, the district shall review the initial appeals response letter and resubmit the worksheet and the supporting documents, as appropriate, for denied appeals.

Districts should repeat the same process as described in [Section 5.2.3](#) only for denied records for which the district has new documentation to support a reversal of the appeals decision. There is no need to resubmit previously approved appeals. Totally new appeals cases that were not appealed before the initial Phase III deadline will be denied.

5.3 Phase III Final Checks

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

1. Did the district review the federal graduation rate exclusion list released to the Accountability Application’s File Downloads page at the start of Phase III and submit appeals as necessary?
2. Did the district submit appeals for all appealable scenarios (see [Section 5.2.1](#))?

Section 6. Embargo Period

The Phase III Final Response issued by the department on **October 2, 2026** concludes the 2025-26 Graduation Cohort Process and begins the Embargo Period. By October 2, all cohort and graduation rate data for the 2025-26 graduating cohort are final while the dropout rate files remain preliminary.

Graduation Rate Data Files

The graduation rate files will contain information related to both the Tennessee and Federal graduation rates and be calculated in accordance with the guidelines outlined in [Section 2.2](#). The list of **graduation rate files** will include:

- Student-level graduation rate file
- School-level graduation rate file
- District-level graduation rate file

The finalized graduation rate files will be released in the accountability application by October 2, 2026.

Dropout Rate Data Files

The department will update the dropout rate data files using TEDS enrollment data as of October 15, 2026. The updated dropout rate data files will be updated in the Accountability application on October 23, 2026 (see [Section 2.3](#) for more information). It is important to note that the dropout rate is not merely the inverse of the graduation rate, as the numerator of the dropout rate excludes students that did not graduate and remained enrolled for a fifth year of school (these students are non-graduates but *not* dropouts). For more information, see [Section 2.3](#). The list of **dropout rate files** will include:

- Student-level dropout rate file
- School-level dropout rate file
- District-level dropout rate file

Embargo Period

All graduation and dropout rate data are under embargo until a news release in the fall of 2026 at a date to be announced.

Section 7: Conclusion

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

Appendices

Appendix A: 60-Day Reassignment Procedure

This section details the steps used by the department to determine which of a district's students, if any, are eligible for a 60-Day Reassignment, as well as to which district and school the eligible student should be reassigned.

1. Find all students in the current graduation cohort who were
 - a. not excluded from the cohort during Phase I²³
 - b. did not earn a traditional high school or alternate academic diploma
 - c. have a withdrawal code indicating that the student dropped out without earning a diploma (e.g., 0 or 1)
2. For these students, find the student's most recent school year of enrollment
 - a. Defined as the most recent year where the student has a primary type of service enrollment with a start date and end date not on the same day²⁴
 - i. Excludes alternative and adult enrollments
 - ii. Excludes ESA, IEA, and Special Education (SPED) Services enrollments
 - iii. Excludes "no-show" or rollover enrollments²⁵

²³ At the end of Phase I, all students for whom the department has approved withdrawal documentation are removed from the Graduation Cohort.

²⁴ If a student was last enrolled in Tennessee public schools in 9th grade, then the "most recent year of enrollment" as defined for the purposes of 60-day reassignment could be three years before the expected graduation year.

²⁵ "No-show" enrollments are defined as enrollments that start and end on the same day and/or end before the school calendar begins.

3. Find all the student's most recently attended school out of all the enrollments filtered in step 2
4. Calculate days attended (days enrolled – days absent) at most recent school²⁶
5. Filter for all students who attended their final school for less than 60 total days in their final year²⁷
6. For the students that remain after the filter in step 5, find all 9-12 enrollments and aggregate a student's days enrolled across all school years for each unique school in their list of enrollments
 - a. primary enrollments only – does not include alternative, adult, ESA, IEA, SPED service, and "no-show" / rollover enrollments
 - b. Aggregate days enrolled at each school in the student's 9-12 list (across school years)
7. Based on the results of step 6, find the school for which the student was enrolled for the most days across grades 9-12²⁸
8. If the school for which the student was enrolled for the most days across 9-12 is not the student's current assigned cohort school, then reassign the student to that school's graduation rate.

²⁶ Note: If student attended their most recently attended school multiple times in their final year, "days attended" is equal to the sum of the number of days the student attended across that year.

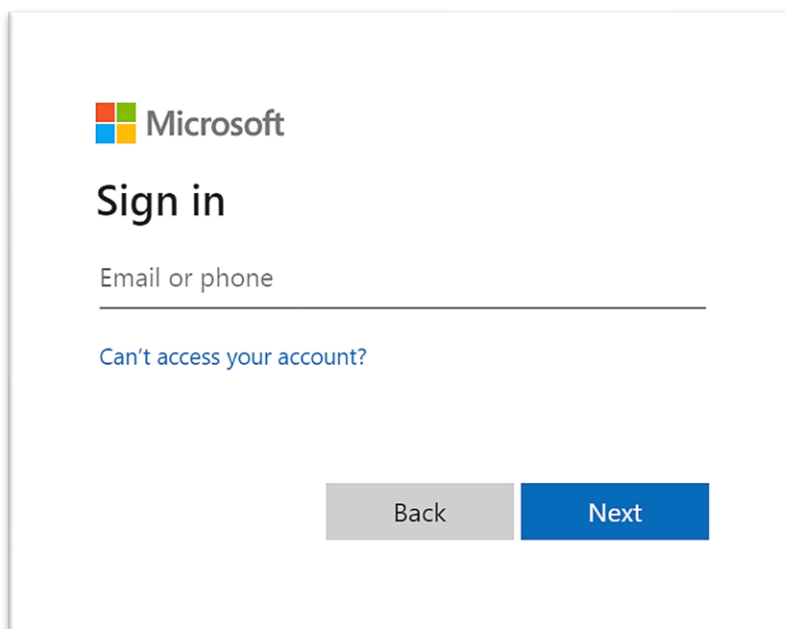
²⁷ Note: A student who is enrolled at their last school for the entire previous year but attended that school for less than 60 days in the final year is still eligible for a 60-day reassignment. For instance, if a student attends Wilson County High School for 180 days in 11th grade, then only 40 days in 12th grade, they could be included during step 5 of automatic 60-day reassignment and could ultimately be reassigned after passing the checks in the subsequent steps.

²⁸ If a student has two schools that are tied for the most days enrolled across 9-12, that student is not eligible for a 60-day appeal.

Appendix B: Microsoft Forms Login Guide

Microsoft Form Login Requirements

- School and district accountability staff must have an SSO/Orion account to submit Microsoft Forms for accountability-related data appeals, including ACT, Cohort, Ready Graduate, accountability data files, accountability and designation, and Report Card data verification process.
- When clicking on the Microsoft Form link, staff will be prompted to sign in. Make sure to sign in with your SSO/Orion account.

A screenshot of the Microsoft sign-in interface. At the top left is the Microsoft logo. Below it, the text "Sign in" is displayed in a large, bold font. Underneath "Sign in" is a text input field with the placeholder text "Email or phone". Below the input field is a link that says "Can't access your account?". At the bottom of the sign-in area are two buttons: a grey "Back" button and a blue "Next" button.

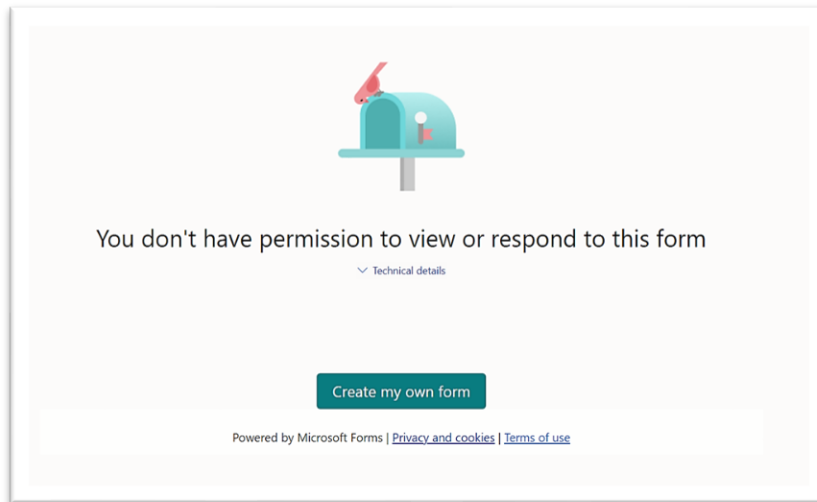
- If staff have trouble logging into their SSO/Orion account, they should refer to the User Guide and contact DT.Support@tn.gov for assistance.

Submitting a Form

- Staff should answer all questions and upload the required documentation following the instructions provided by the department.
- After clicking the Submit button, staff also has the option to save a PDF version of the submission by selecting "Print or get PDF of answers."

Troubleshooting Common IT issues

If you are blocked from using the form and receive a message that “you don’t have permission to view or respond to this form,” the conflicting logins in your browser may be interfering with your access.



To avoid this, please attempt the following depending on which browser you are using:

- Using Google Chrome, open a new incognito window and re-sign into the SSO/Orion account.
- Using Microsoft Edge, open a new InPrivate window and re-sign into the SSO/Orion account.
- Using Firefox or Safari, open a new private window and re-sign into the SSO/Orion account.

If attempting to open the Microsoft forms link from within the data appeals resource guides, make sure the form window opens in the same browser in which the resource guide was opened.

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