

# 2025-26 Graduation Cohort Process Phase I Guide

February 2026

This document provides detailed guidance on required district data submission and data appeals tasks during Phase I 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.<sup>1</sup>

It also provides a [timeline](#) for all three 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 [Table 1](#).

A second appeals guide focusing on Cohort Phase II and III district tasks will be released in Summer 2026 to help districts navigate the appealable issues and data submission tasks during those phases.

## 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 ID<sup>2</sup>.
- 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 9.1.2](#).
- The [Graduation Cohort Phase I FAQ](#) has been updated for 2025-26 to provide answers to more common questions. Please reach out to [TNEd.Graduates@tn.gov](mailto:TNEd.Graduates@tn.gov) for all other questions related to the Cohort process not covered in the FAQ or in this document.

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

<sup>2</sup> 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.

## Table of Contents

Section 1: Overview .....	5
Table 1. Cohort Process Timeline.....	6
Section 2: Graduation Rate Guidelines .....	9
2.1 Data Sources for Graduation and Cohort Status.....	9
2.1.1 Cohort Data Sources – EIS vs TEDS .....	9
2.1.2 Student Cohort Membership Data Source.....	10
2.2. Federal vs Tennessee Graduation Rates .....	10
2.2.1 Federal Graduation Rate .....	10
2.2.2 Tennessee Graduation Rate .....	11
2.3. Dropout Rates .....	11
2.4. Student Group Membership and Graduation Rate Reporting.....	11
2.5 Student Attribution at Adult High Schools and Alternative Schools.....	12
2.5.1 Students Who Graduate from Alternative Schools.....	12
2.5.2 Students Who Graduate from an Adult High School in Same District as Assigned Cohort School.....	13
2.5.3 Students Who Graduate from an Adult High School in Different District than Assigned Cohort School .....	13
2.6 Students Without Primary Enrollments in Public Schools .....	13
Section 3: TISA Graduates Roster .....	15
Table 2. Graduating Cohort vs. Graduating Class .....	15
Section 4: Reviewing Cohort / Graduating Class Data .....	17
4.1. Reviewing Cohort Information.....	17
4.1.1 Checking Student Completion Status.....	17
4.1.2 Checking Withdrawn Students.....	17
4.1.3 Ensuring Student Inclusion in Correct Cohort.....	18
4.2 Potential Cohort Issues Report .....	18
Table 3. Potential Cohort Issues.....	19
4.3 Reviewing the TISA Graduate Roster .....	20
Section 5: Submitting Completion Information .....	22
5.1 Completion Type .....	22
Table 4. Completion Types and Codes .....	22
5.2 Completion Date .....	23
5.3 Completion Period .....	23
Section 6: Submitting Withdrawal Information .....	25
6.1 Entering Withdrawal Codes .....	25

Table 5. Withdraw Codes and Cohort Action.....	25
6.1.1 Students Enrolling in Online Schools .....	27
6.1.2 Students Enrolling in Home School .....	27
6.1.3 Withdrawal Codes and Cohort Status .....	27
6.2 Required Documentation for Withdrawal Codes .....	28
6.2.1 Withdrawal Code 2 (withdrawn to DCS Educational Placement) .....	28
6.2.2 Withdrawal Code 3 (transferred to another Tennessee public school district) .....	29
6.2.3 Withdrawal Code 4 (transferred to another public school in the same district).....	29
6.2.4 Withdrawal Code 5 (transferred out-of-state/out-of-country) .....	29
6.2.5 Withdrawal Code 6 (transferred to and enrolled in a non-public school in Tennessee).....	30
6.2.6 Withdrawal Code 8 (deceased).....	30
6.2.7 Withdrawal Code 10 (withdrawal to in-state homeschool).....	31
6.2.8 Withdrawal Code 11 (court-ordered placement, such as jail or prison) .....	31
6.2.9 Withdrawal Code 17 (transferred to and enrolled in an out-of-state private online school) .....	31
6.3 Uploading Withdrawal Documentation .....	32
6.3.1 Mass Upload Feature .....	32
Section 7: Cohort Change Requests.....	34
7.1 Cohort Change Submission Timeline .....	34
Table 6. Cohort Change Request Submission Timeline.....	34
7.2 Cohort Change Request Appealable Issues and Required Documentation.....	35
7.2.1 Incorrect Cohort Year.....	35
7.2.2 Duplicate Student ID .....	35
7.2.3 9 <sup>th</sup> Grade No-Show/District Enrollment Error .....	36
7.2.4 Set Included in Cohort Value to “Y” .....	36
7.3 Submitting a Cohort Change Request .....	36
7.3.1 Fill Out Contact Information Tab .....	36
7.3.2 Fill Out Cohort Changes Tab.....	37
7.3.3 Saving the Cohort Change Request Worksheet .....	37
7.3.4 Saving Cohort Change Request Documentation.....	37
7.3.5 Submitting the Cohort Change Request Form .....	37
Section 8: Phase I Final Checks .....	39
Section 9: Phase II and III Tasks and Appealable Issues.....	40
9.1 Phase II Tasks and Appealable Issues.....	40
9.1.1 Entering Summer Graduate Information .....	40
9.1.2 Phase II Appealable Issues .....	40

9.1.3 Import Student Transcript Data in EIS/TEDS.....	42
9.2 Phase III Tasks and Appealable Issues.....	42
9.2.1 Phase III Appealable Issues .....	42
9.3 End of 2025-26 Graduation Cohort Process .....	43
Section 10: Conclusion .....	44

## Section 1: Overview

The graduation cohort process consists of three phases:

- **Phase I**—Districts will report student withdrawal information for the 2025-26 graduating cohort and completion information for both the 2025-26 graduating cohort and the 2025-26 graduating class, submit cohort change requests, and upload required documentation.
- **Phase II**—Districts will report summer graduates for the 2025-26 graduating cohort and 2025-26 graduating class and submit appeals for appealable issues.
- **Phase III**—Districts will submit appeals for appealable issues, verify the federal graduation rate, and review preliminary graduation rates.
- **Embargo.** Graduation rate data are final by the end of Phase III and will be under embargo until department news release (to be determined).

The first phase of the 2025-26 graduation cohort process **opens on February 17, 2026, and closes on June 26, 2026**. Districts should complete all Phase I tasks **by 9 p.m. CDT on the deadlines** specified in [Table 1](#). *Any Phase I related inquiries submitted after the specified timeline will be denied.* The department will also communicate all initial and final responses by 9 p.m. CDT on the specified dates. Districts will have the opportunity to correct any issues that resulted in the denial of Phase I documentation by **June 26, 2026**.

Districts should submit and update completion and withdrawal data and submit appeals for both the current cohort (i.e., 2025-26 graduating cohort) and future cohorts (i.e., 2026-27, 2027-28 and 2028-2029 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.

The department will also communicate all initial and final responses by 9 p.m. CDT as specified in [Table 1](#). Instructions for the specific tasks for Phase I as well as a list of appealable issues in Phases II and III are discussed in subsequent sections of this document.

**Table 1. Cohort Process Timeline**

Date	Milestone	Tasks
<b>Cohort Phase I (February 17 - June 26, 2026)</b>		
<p><b>February 17– June 5, 2026</b></p>	<p><b>District Submission Window:</b> Phase I tasks complete</p>	<p>During this window, districts shall complete the following tasks:</p> <ul style="list-style-type: none"> <li>• Submit (1) completion information (see <a href="#">Section 5</a>) and (2) withdrawal information (see <a href="#">Section 6</a>) for the 2025-26 graduating cohort and 2025-26 graduating class in EIS/TEDS.</li> <li>• Upload acceptable withdrawal documentation (see <a href="#">Section 6</a>) on the Cohort application.</li> <li>• Review the Cohort Issues report on the Accountability Application and update EIS/TEDS data as necessary (see <a href="#">Section 4.2</a>).</li> <li>• Submit Cohort Change requests and documentation as necessary using the <a href="#">Cohort Change Request form</a> (see <a href="#">Section 7</a>).</li> </ul> <p>All withdrawal codes must be submitted to EIS/TEDS on or before <b>June 4</b>. All withdrawal documentation and Cohort Change Requests must be submitted by <b>June 5</b>. Any new inquiries submitted after these deadlines will be denied.</p>
<p><b>June 12, 2026</b></p>	<p><b>Initial Response:</b> Initial Appeals Approval/Denial</p>	<p>During this window, the department will review all documentation submitted by June 5 and approve or deny the submitted documentation. Districts are encouraged to check:</p> <ul style="list-style-type: none"> <li>• The Cohort application for withdrawal documentation approval or denial</li> <li>• The Accountability Application for the district’s initial TISA Roster</li> <li>• The director’s email inbox for Cohort Change Request decisions</li> </ul> <p>All decisions will be communicated by <b>June 12</b>.</p>
<p><b>June 15-18, 2026</b></p>	<p><b>Remediation window:</b> District resubmission complete</p>	<p>During this window, districts shall complete the following tasks by <b>June 18</b>:</p> <ul style="list-style-type: none"> <li>• Resubmit withdrawal documentation in the Cohort application to correct denials.</li> <li>• Resubmit cohort change requests to correct denials.</li> </ul>
<p><b>June 25, 2026</b></p>	<p><b>Completion Information Submission Deadline:</b> Fall/Spring Graduates Updated</p>	<p>The department will release an initial TISA graduate roster containing all members of the graduating class, except summer graduates, on the Accountability application on <b>June 12</b>. Districts should check:</p> <ul style="list-style-type: none"> <li>• The Cohort Application to confirm that that graduation status for the cohort is reflected accurately</li> <li>• The Accountability Application to confirm that graduation status for members of the graduating class is reflected accurately</li> </ul> <p>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 fall and spring graduates by <b>June 25</b>.</p>
<p><b>June 26, 2026</b></p>	<p><b>Final Response:</b> Final Appeals Approvals/Denials</p>	<p>The department will review all remediation appeals submitted by June 18 and make final decisions by <b>June 26</b>. Districts are encouraged to check:</p> <ul style="list-style-type: none"> <li>• The Cohort application for withdrawal documentation approval or denial</li> <li>• The Accountability Application for the district’s updated TISA Roster</li> <li>• The director’s email inbox for Cohort Change Request decisions</li> </ul> <p>After this date, all decisions related to Phase I appeals tasks are final.</p>

Date	Milestone	Tasks
<b>Cohort Phase II (July 13 – August 14, 2026)</b>		
<b>July 13 – 31, 2026</b>	<b>District Submission window:</b> Phase II tasks complete	During this window, districts shall complete the following tasks: <ul style="list-style-type: none"> <li>• Report summer graduates for the 2025-26 graduating cohort and 2025-26 graduating class in TEDS.</li> <li>• Confirm that all student transcript data for the 2025 graduating cohort was imported successfully into EIS (courses from SY 24-25 and earlier) and TEDS (courses from SY 2025-26).</li> <li>• Submit appeals for appealable situations (see <a href="#">Section 9.1.2</a>), including               <ul style="list-style-type: none"> <li>○ Department / system errors</li> <li>○ Reassignment appeals</li> <li>○ Other appealable scenarios</li> </ul> </li> </ul> All Phase II appeals must be submitted by <b>July 31st</b> . Any new inquiries submitted after the deadline will be denied.
<b>August 7, 2026</b>	<b>Initial response:</b> Initial response letter sent	The department will review all documentation submitted by July 31st and approve or deny the submitted documentation by <b>August 7</b> . Districts are encouraged to check the Accountability Application’s File Downloads page and the director’s email inbox for <ul style="list-style-type: none"> <li>• Phase II appeals decisions</li> <li>• Cohort reassignments resulting from 60-day appeals</li> </ul>
<b>August 10-12, 2026</b>	<b>Remediation window:</b> Resubmission complete	During this window, districts shall complete the following tasks by August 12: <ul style="list-style-type: none"> <li>• Resubmit appeals to correct denials if additional appropriate documentation is available.</li> </ul>
<b>August 13, 2026</b>	<b>Completion Information Submission Deadline:</b> Summer Graduates	The department will release an updated TISA graduate roster containing all members of the graduating class to the Accountability application’s file downloads page on August 7. Districts should check: <ul style="list-style-type: none"> <li>• the Cohort Application and /or Accountability Application to confirm that that graduation status for the cohort is reflected accurately</li> <li>• the Accountability Application to confirm that graduation status for members of the graduating class is reflected accurately</li> </ul> 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 in TEDS by <b>August 13</b> . After August 13, the TISA Roster is finalized and can no longer be
<b>August 14, 2026</b>	<b>Final Response:</b> Final response letter sent	The director of schools will receive a final response letter for the resubmitted appeals by August 14, and the finalized TISA graduate roster will be released on the Accountability application; all decisions for Phase II tasks will be final.
<b>Cohort Phase III (August 24 – October 2, 2026)</b>		
<b>August 24 – September 4, 2025</b>	<b>Submission window:</b> Phase III tasks complete	During this window, districts shall complete the following tasks by September 4: <ul style="list-style-type: none"> <li>• Submit appeals for appealable situations (<a href="#">see Section 9.2.1</a>), including               <ul style="list-style-type: none"> <li>○ department / system errors</li> <li>○ receiving students because of another district’s 60-day appeal</li> <li>○ federal graduation rate appeals</li> </ul> </li> </ul> Any new inquiries submitted after September 4 will be denied.

Date	Milestone	Tasks
September 18, 2026	<b>Initial response:</b> Initial response letter sent	<p>The department will review all documentation submitted by September 4 and approve or deny the submitted documentation.</p> <ul style="list-style-type: none"> <li>• The director of schools will receive an initial response letter by September 18.</li> <li>• The initial response letter will be uploaded on the Accountability application.</li> <li>• The list of students excluded from the federal graduation rate will be updated on the Accountability Application.</li> </ul>
September 21-25, 2026	<b>Remediation window:</b> Resubmission complete	<p>During this window, districts shall complete the following tasks by September 25:</p> <ul style="list-style-type: none"> <li>• Resubmit appeals to correct denials if additional appropriate documentation is available.</li> </ul>
October 2, 2026	<b>Final Response:</b> Final response letter sent	<p>The director of Schools will receive a final response letter for the resubmitted appeals by October 2. After this point, all decisions for Phase III tasks will be final, and all cohort and graduation data are final.</p> <p>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.</p> <p><b>Embargo.</b> Graduation rate data will be under embargo until the news release. Timeline for the Graduation Rate news release is to be determined.</p>

## Section 2: Graduation Rate Guidelines

Federal law<sup>3</sup> 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, including completion types 1, 8, 11, 12, or 13<sup>4</sup>, 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.

### 2.1 Data Sources for Graduation and Cohort Status

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

<sup>3</sup> For more information, please click [here](#).

<sup>4</sup> For more information on completion types, please see [Section 5.1](#).

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 Student Cohort Membership Data Source

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.<sup>5</sup> Once a student has been placed with a graduation cohort, their cohort membership cannot be changed except via a Cohort Change Request. For more information on how to submit a Cohort Change Request, please consult [Section 7](#).

## 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 9<sup>th</sup> 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](#)<sup>6</sup>. The distinction between the two is discussed below.

### 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 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

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<sup>5</sup> If the 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 graduation cohort based on their implied ninth grade cohort year. For instance, a student with a 10<sup>th</sup> grade enrollment in 2023-24 would be placed in the 2025-26 graduation cohort with students that first entered 9<sup>th</sup> grade in fall of 2022.

<sup>6</sup> Also see SBE Rule [0520-01-03-.06](#).

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 rate<sup>7</sup> for federal accountability purposes.

## 2.3. Dropout Rates

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

- Have no completion type<sup>8</sup> (see Completion Type in [Section 5.1](#)) and were not enrolled in a Tennessee public school as of Oct. 1 of the following school year after the anticipated graduation year of their cohort, **or**
- Have no completion data, and have withdrawal codes of 0, 1, 3, or 4 in the most recent enrollment of the following school year *after* the anticipated graduation year of their cohort.

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.

## 2.4. Student Group Membership and Graduation Rate Reporting

Graduation rates are calculated for all student groups, including

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<sup>7</sup> 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.

<sup>8</sup> This also includes students with completion type 5 (No Diploma, Senior but did not complete), as this completion type indicates students who did not earn a completion document of any kind.

- 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, a different method is applied. That is, once a student is identified in the historically underserved student group (i.e., BHN, EL, ED, SWD) during any of the high school years, the student will be assigned to that underserved student group for graduation rate reporting. For instance, if a student is assigned to ED in grade 10 but not in grade 9, 11, or 12, the students' graduation data is included in the calculation for the All Students group and ED group.

## **2.5 Student Attribution at Adult High Schools 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 law<sup>9</sup>, 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-time<sup>10</sup> 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 below.

### **2.5.1 Students Who Graduate from Alternative Schools**

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<sup>9</sup> [\(20 U.S.C. § 7801\(25\)\(A\)\(i\); 34 C.F.R. § 200.34\(a\)\(2\)\)](#)

<sup>10</sup> "On-time" here meaning within four years and a summer of first entering ninth grade.

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 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. 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 Students Who Graduate from an Adult High School in Same District as Assigned 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 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 Students Who Graduate from an Adult High School in Different District than Assigned 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 Without Primary Enrollments in Public Schools**

Some enrollments reflected in EIS/TEDS represent students who are not primarily enrolled in any of the Tennessee public schools. Students enrolled in the IEA or ESA programs or students who have a secondary enrollment at a Tennessee public school to receive special education services without another concurrent primary enrollment 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 9<sup>th</sup> 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 9<sup>th</sup> grade. For a detailed overview of the differences between the 2025-26 Graduation Cohort and the 2025-26 Graduating Class, please consult Table 2 below.

**Table 2. Graduating Cohort vs. Graduating Class**

Graduating Cohort (2025-2026)	Graduating Class (2025-2026)
<ul style="list-style-type: none"> <li>• Used in federal and state accountability</li> <li>• Includes all students that entered 9<sup>th</sup> grade in 2022-23, regardless of completion status by the end of summer 2026</li> <li>• Includes students who entered grade 9 in 2022-23 and graduated early (i.e., prior to 2025-26)</li> <li>• Only students with an enrollment status of “P” in at least one enrollment are included</li> <li>• 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)</li> </ul>	<ul style="list-style-type: none"> <li>• Used for calculating TISA outcomes bonuses</li> <li>• 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<sup>th</sup> grade or number of years taken to complete high school</li> <li>• Includes some students who entered grade 9 before 2022-23 and graduated late or who entered grade 9 after 2022-23 and graduated early (in both cases, student must graduate in 2025-2026)</li> <li>• Students who graduate from an adult high school with a “P” in their enrollment status are eligible for TISA bonuses</li> </ul>

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 1<sup>st</sup>, 2025, and July 31<sup>st</sup>, 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).<sup>11</sup> By the end of Phase II, the TISA graduate roster is final and can no longer be appealed during subsequent phases of the CCR data verification process. See [Table 1](#) in [Section 1](#) for required tasks in Phase I and Phase II related to finalizing the TISA graduate roster.

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<sup>11</sup> 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](#).

## Section 4: Reviewing Cohort / Graduating Class Data

Throughout Phase I of the Cohort Process, districts should review their graduation cohort and graduating class data to identify discrepancies and submit updates accordingly. The following sections discuss the main ways districts can review their data during Phase I.

### 4.1. Reviewing Cohort Information

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

1. Navigate to the [Cohort application](#) and log in through Single Sign On.
2. Select the "User" option under "Log on As..." for the Cohort application.
3. Read the News and Timeline sections on the Instructions page of the Cohort application.
4. Click the checkbox that says, "I agree / I acknowledge that I have read the news."
5. Click the "Show Data" button.
6. Select the desired graduation cohort year from the drop-down menu (e.g., 2025-2026)
7. Click the "Download CSV File" link.

#### 4.1.1 Checking Student Completion Status

Districts should filter this file for included students<sup>12</sup> who have completion types other than 1, 8, 11, 12, or 13. These students will count against districts' graduation rates. Districts should compare these students to data in their SIS packages to ensure all students are counted correctly. If students are credited incorrectly, districts should update their completion data. For more information on updating completion data, please consult [Section 5](#).

#### 4.1.2 Checking Withdrawn Students

Districts should check to see if students who have withdrawn are still included<sup>13</sup> in the school's cohort. Students with eligible withdrawal codes may be removed from the student's cohort if the district submits acceptable withdrawal documentation to the Cohort Application for approval. For more information on circumstances where withdrawn students can be removed from the cohort and procedures for submitting withdrawal documentation, please consult [Section 6](#).

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<sup>12</sup> 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.

<sup>13</sup> Ibid.

### 4.1.3 Ensuring Student Inclusion in Correct Cohort

Students are assigned to a graduation cohort based on information submitted to EIS and TEDS via district SIS packages.<sup>14</sup> Sometimes, due to errors in enrollment records, students are assigned to the incorrect cohort, assigned to a cohort twice, assigned to no cohort at all, or are incorrectly excluded from the graduation cohort. Therefore, districts should review student records and verify data in EIS, TEDS, and the Cohort application carefully to make sure students are assigned to the correct cohort. The department recommends that districts download the Cohort Data for all four active graduation cohorts (e.g., 2025-26, 2026-27, 2027-28, and 2028-29) to confirm that students are placed correctly. For example, after downloading these files, districts should check to make sure that all fourth-year high school students in the district's records are reflected in 2025-26 cohort file, and no other students are reflected in the file.

If a student is not included in the current graduation cohort file, districts should check to see if the student is included in the graduation cohort file for another year. If a student is not included in any active graduation cohort file, districts should check to confirm that the student has high school enrollment data in EIS and/or TEDS, and, if necessary, correct the student's enrollment records.

If a student is included in the graduation cohort file for another cohort year, is duplicated in the cohort file, or is otherwise included in or excluded from the cohort in error, the district should submit a cohort change request. For more information on submitting Cohort Change Requests, please consult [Section 7](#).

## 4.2 Potential Cohort Issues Report

To assist districts in identifying potential issues with their graduation cohort, the department will upload a Potential Cohort Issues Report file 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. In this file, districts will be able to view information about each student with a potential issue, including

- **Student State ID**
- **Student's Cohort Year:**
  - Graduation cohort student is included in (year student first entered ninth grade)
- **Information About the Student's Graduation Cohort Enrollment:**
  - These columns provide information about a student's most recent traditional school enrollment and reflect the district and school to which the student is assigned for graduation rate calculations. Includes district number, district name, school number, school name, school year, grade, enrollment begin date, enrollment end date.
- **Information About the Student's Most Recent District and School:**

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<sup>14</sup> For more information about the mechanics of this process, please consult [Section 2.1.2](#).

- These columns provide information about a student’s most recent enrollment in any school type. Typically, this is the same as the student’s graduation cohort enrollment but may be different if a student was most recently enrolled in an adult school or in case of enrollment error. Includes district number, district name, school number, school name, school year, grade, enrollment begin date, enrollment end date
- **Information About the Student’s First 9<sup>th</sup> Grade District and School:**
  - This is the student’s first grade 9 enrollment in EIS/TEDS. Includes district number, district name, school number, school name, school year.
- **Potential Cohort Issue:** This field indicates the potential issue that led to the student being included in the report. For a full list of flagged issues, see [Table 3](#).
- **Suggested District Action:** This field indicates a suggested district action districts may want to take after reviewing the data carefully to determine if there is, in fact, an error. The list of suggested actions includes updating the student’s data in EIS/TEDS and submitting a Cohort Change Request.

Districts should review this report carefully to determine if there is, in fact, an issue with an included student’s cohort placement. If, after reviewing the student’s data, there is no issue, then districts do not need to take any action.<sup>15</sup>

However, if districts confirm that there is an issue with students’ cohort placement, they should take the suggested action. For students for whom the “Suggested District Action” has to do with resolving an error in the student’s enrollment, districts should correct the error and resubmit data to EIS/TEDS.<sup>16</sup> For students for whom the “Suggested District Action” is “Submit Cohort Change Request,” districts should submit a Cohort Change Request (see [Section 7](#) for further instructions).

**Table 3. Potential Cohort Issues**

Potential Issue	Description	Suggested District Action
Alternative School Primary Enrollment	Alternative school students should enroll under a secondary enrollment, but student in question has a primary enrollment at an alternative high school <sup>17</sup>	Create primary enrollment at a home school and convert alternative enrollment to secondary enrollment
Alternative School Student Lacks Home School Enrollment in Most Recent District	Alternative school students should be connected to a home school in the same district as the alternative school <sup>18</sup>	Create primary enrollment at a home school in current district

<sup>15</sup> The potential issue will remain flagged in the Cohort Issues Report.

<sup>16</sup> Information for students in the 2025-26 Graduation Cohort is sourced from a combination of data from EIS and TEDS. Whether a student’s data element is sourced from EIS vs TEDS depends on the school year it is taken from; for more information, please consult [Section 2.1.1](#).

<sup>17</sup> See [Section 2.5.1](#) for more guidance on alternative school enrollments.

<sup>18</sup> Exceptions apply for schools that use an adjacent district’s alternative school. See [Section 2.5.1](#) for more guidance on alternative school enrollments.

Potential Issue	Description	Suggested District Action
Legacy SSID Duplicated in TEDS	In TEDS, each Ed-Fi ID is connected to a Legacy SSID that was used in EIS. Each Ed-Fi ID should be connected to exactly one Legacy SSID; however, due to district data entry error, this Legacy SSID is designated as the ID for multiple Ed-Fi IDs.	Email <a href="mailto:DT.Support@tn.gov">DT.Support@tn.gov</a> to resolve the issue
Legacy SSID No Longer Exists in EIS/TEDS	At some point, this Legacy SSID was attached to a high school enrollment in EIS and/or TEDS, thereby triggering its inclusion in the Cohort Application. However, no high school enrollments exist for this SSID any longer, most likely indicating that it was a duplicate ID deleted by <a href="mailto:DT.Support@tn.gov">DT.Support@tn.gov</a> .	Confirm that this Legacy SSID was a duplicate for another Legacy SSID, then submit a <a href="#">Cohort Change Request</a> with acceptable documentation
Mismatch Between Cohort Year and First Grade 9 Year	The first grade 9 enrollment entry for this student in EIS/TEDS does not match this student's cohort year.	If enrollment entry is an error, adjust in EIS/TEDS. If cohort year is incorrect, submit a <a href="#">Cohort Change Request</a> with acceptable documentation
Potential Enrollment Rollover Error	This student was included in the Cohort due to a single 9 <sup>th</sup> grade enrollment entry that began before the school year started and/or began and ended on the same day, possibly suggesting that the student was expected to enroll in high school in the district but never actually showed up.	District should confirm that student in fact never attended a public high school in Tennessee for a single day, then submit a <a href="#">Cohort Change Request</a> with acceptable documentation.
Student Enrolled in Adult High School Before Age 17	Students that enroll in an adult high school should be aged 17 or older. Based on this student's birth date and enrollment start date, they began their enrollment at an adult high school before turning 17.	Adjust student enrollment

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 21<sup>st</sup>, 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.

### 4.3 Reviewing the TISA Graduate Roster

While the Cohort Application should be the primary source for verifying a district's graduation cohort (see [Section 4.1](#)), 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 I window, districts should submit completion information for all students who graduated in fall 2025 or spring 2026, regardless of when that student entered 9<sup>th</sup> grade. On June 12<sup>th</sup>, the department will release an initial roster of all students currently 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 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 information in TEDS accordingly. For more information on updating completion information, please consult [Section 5](#).

## Section 5: Submitting Completion Information

Throughout the Phase I process, districts should submit completion information for all members of the 2025-2026 graduation cohort and graduating class.<sup>19</sup>

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 fall and spring graduates is by **9 p.m. CDT on June 25, 2026**.

All completion information for students who graduate 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, completion document period, or end of service action date may cause an error and prevent the data from loading correctly into the Cohort application. Note that providing a withdrawal code of 12 (Early Graduate) is not sufficient for the student to be credited as a graduate – the student must also have a completion type and completion date.

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

### 5.1 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 <sup>20</sup>
7	Occupational Diploma (Valid as of 2015-16) – Completed the occupational diploma Skills,

<sup>19</sup> See [Section 3](#) for more information on the difference between the graduation cohort and graduating class

<sup>20</sup> 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.

Document Code	Completion Document Short Description
	Knowledge, and Experience Mastery Assessment (SKEMA) and two years of paid or non-paid work experience
<b>8</b>	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
<b>11</b>	Traditional High School Diploma with Foreign Language Waiver
<b>12</b>	Traditional High School Diploma with Fine Arts Waiver
<b>13</b>	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 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).

## 5.2 Completion Date

Completion dates for fall and spring graduates should not fall outside the date parameters of the student’s enrollment (e.g., a completion date of 6/11/2026 for an enrollment that ends on 5/29/2026). Summer graduates, on the other hand, 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.

## 5.3 Completion Period

For completion information submitted to EIS for school years 2024-25 and earlier, students who graduate before the normal spring graduation date (i.e., at the end of the fall semester) should be assigned a completion period of “EA.” Students who graduate at the expected time should be assigned a completion period of “SP.” Students who graduate during the summer should be assigned a completion period of “SU.”

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. For completion data from 2025-26 and beyond, districts must ensure that the completion type and completion date are complete and follow the parameters listed in [Section 5.1](#) and [Section 5.2](#) above.

***Important!*** It is essential to enter completion information for fall/spring graduates in EIS/TEDS before **9 p.m. CDT June 25, 2026**. Any student without either a completion code or an acceptable withdrawal code will be counted as a non-graduate.<sup>21</sup>

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<sup>21</sup> Please note that students with a withdrawal code of 12 who lack a completion type, completion date, and completion period will be credited as non-graduates.

## Section 6: Submitting Withdrawal Information

Throughout the Phase I process, districts should submit withdrawal information for all members of the 2025-2026 graduation cohort and graduating class.<sup>22</sup>

All students who withdraw should be given a withdrawal code. For students with withdrawal codes 2, 5, 6, 8, 10, 11, and 17, districts should also upload documentation to the Cohort Application. More information on submitting withdrawal codes and uploading acceptable documentation is provided in the following sections.

### 6.1 Entering Withdrawal Codes

The department updates the Cohort application data nightly during Phase I. Districts must enter or update withdrawal status in EIS/TEDS and wait until the correction loads in the Cohort application the next day before uploading the required supporting documentation.

Therefore, 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 documentation to the Cohort application is by **9 p.m. CDT on June 5, 2026**.

In TEDS, withdrawal codes are referred to as “exit withdraw types” and are represented by a short description of the reason for the student’s withdrawal connected to the student’s terminated enrollment. In EIS and in the Cohort Application, withdrawal codes are referred to as the “withdrawal reason” and are represented as a numeric code. [Table 5](#) describes the different withdrawal codes, descriptions, and subsequent cohort actions.

**Table 5. Withdraw Codes and Cohort Action**

Withdrawal Code	Description	Definition	Cohort Action
00	Dropout, under 18	Dropout, under 18. Includes transfers to Adult HS, GED programs, Job Corps and students reported as missing.	Included in cohort; counted as dropout if there is no subsequent enrollment
01	Dropout, 18 and over	Dropout, 18 and over. Includes transfers to Adult HS, GED programs, Job Corps and students reported as missing.	
02	Withdrawn to DCS Educational Placement	Withdrawn and placed in the custody of the Department of Children’s Services (DCS) to be educated in a youth development center or DCS-affiliated school. <sup>23</sup>	Excluded from cohort <b>only if</b> adequate documentation is provided; otherwise, remains in cohort
03	Transferred to other Tennessee School System	Transferred to another public school in a different Tennessee district.	Included in cohort until receiving school reports subsequent enrollment in EIS/TEDS; otherwise, counted as dropout if there
04	Transferred to another School	Transferred to another public school in the same Tennessee district.	

<sup>22</sup> See [Section 3](#) for more information on the difference between the graduation cohort and graduating class

<sup>23</sup> Please consult the [School Directory](#) for a list of DCS schools.

Withdrawal Code	Description	Definition	Cohort Action
			is no subsequent enrollment
05	Transferred out of State	Transferred to an out-of-state educational program and student no longer resides in Tennessee.	Excluded from cohort <b>only if</b> adequate documentation is provided; otherwise, included in cohort
06	Transferred to nonpublic School in Tennessee	Transferred to any Tennessee non-public school contained on the state list. <sup>24</sup>	
07	Doctor certified withdrawal	This code should be used only for students who are deemed by a licensed physician to be so sick or incapacitated that no return to school is anticipated, and the withdrawal is considered permanent. <sup>25</sup>	Included in cohort
08	Deceased	Deceased	Excluded from cohort <b>only if</b> adequate documentation is provided; otherwise, included in cohort
10	Withdrawn to a home school; pre-K withdrawn	Withdrawn to a home school (formal intent to register must be on file). <sup>26</sup> Districts may also use this code for situations where a Pre-K student withdraws (not applicable for cohort).	
11	Court Order	Court order to placement with the Department of Corrections, county jail, or city jail after student was tried and convicted as an adult.	
12	Early Graduate	A student who withdraws after graduating in less than four years.	Included in cohort; counted as graduate <b>only if</b> district assigns appropriate completion type (1, 8, 11, 12, 13)
13	Permanent dismissal from Tennessee's voluntary pre-K program	Permanent dismissal from Tennessee's voluntary pre-k program.	Not applicable to cohort
15	TEIS transition, non-eligible for special education services	TEIS student withdrawn after being deemed ineligible for special education services.	
16	Permanent withdrawal of a special education student	Used when special education student who previously earned a completion document and remained in school under the FAPE provision withdraws permanently. <sup>27</sup>	Only included in the graduation rate of <b>one</b> cohort based on year entered grade 9
17	Student withdrawal to online school not in Tennessee	Student is withdrawing from a Tennessee public school but remains a resident and is enrolling in a non-public online school where the content is delivered via the Internet and the school is not located in Tennessee.	Excluded from cohort <b>only if</b> adequate documentation is provided; otherwise, included in cohort

<sup>24</sup> Please consult the [School Directory](#) for a list of non-public schools.

<sup>25</sup> Students with a temporary medical condition should be kept enrolled and treated as Homebound students.

<sup>26</sup> Note that this code should be used in situations where a student's parent/guardian files an intent to home school and not in situations where the student withdraws to a home school umbrella program on the state's approved non-public schools list (code 06), nor when the student withdraws to an out-of-state online school (code 17).

<sup>27</sup> This code is not intended to be used to indicate the end of year action when a Free Appropriate Public Education (FAPE) student is returning for the next school year (no withdrawal code is needed in that case).

### 6.1.1 Students Enrolling in Online Schools

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 withdrew and enrolled in an in-state, public/charter online school should be given a withdrawal code of 03 (if the school is in another district) or 04 (if the school is in the same district).
- Students who withdrew and enrolled in an out-of-state public (including charter) online school should be given a withdrawal code of 05.
- Students who withdrew 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.
- Students who withdrew and enrolled in an in-state non-public online school should be given a withdrawal code of 06.
- Students who withdrew and enrolled in an out-of-state private online school while remaining Tennessee residents should be given withdrawal code of 17.

### 6.1.2 Students Enrolling in Home School

Students who enroll in home school may be given one of several withdrawal codes depending on the student's circumstances. Typically, students who withdraw to attend home school while remaining Tennessee residents should be given a withdrawal code of 10. 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.<sup>28</sup> Alternatively, students who are moving out of state to begin home school 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](#) for more information on required documentation for withdrawal codes 05, 06, and 10.

### 6.1.3 Withdrawal Codes and Cohort Status

[Federal law](#) only allows students to be removed from a cohort if they enroll in another program that awards regular (traditional high school) diplomas or alternate academic diplomas.<sup>29</sup> Students who withdraw to temporary programs or programs that award a lesser credential not aligned to state graduation standards like Job Corps are not eligible for removal from the Cohort during Phase I.<sup>30</sup> Federal

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<sup>28</sup> Students who are receiving curriculum from a home school curriculum provider but are not enrolled in an approved 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.

<sup>29</sup> Exceptions apply for students who leave the United States, who are permanently incarcerated, or who pass away before their expected date of graduation. See guidance in this section for Withdrawal Codes 05, 08, and 11 respectively.

<sup>30</sup> See [20 U.S.C. § 7801\(25\)\(C\)](#). Students who withdraw to Job Corps should be assigned a withdrawal code of 00 or 01. Students who receive a regular (traditional high school) or alternate academic diploma after enrolling in a temporary program like Job Corps may be removed from the cohort during Phase II. See [Section 9.1.2](#) for more information on submitting a Phase II appeal.

law<sup>31</sup> also stipulates that, before students are removed from a school's graduation cohort, districts must provide official documentation confirming a student's transfer to a different educational program before the end of their expected graduation year.<sup>32</sup>

Therefore, students are eligible for removal from the cohort only if they have an eligible withdrawal code (i.e., 2, 3, 4, 5, 6, 8, 10, 11, or 17) and – when applicable – the district submits the required documentation via the Cohort application to confirm enrollment after withdrawal. Any student who has an eligible withdrawal code but does not have proper corresponding documentation will remain in the cohort and be counted against the graduation rate. As such, the department recommends that districts filter their student-level cohort files by withdrawal reason to ensure they have uploaded documentation for all eligible students.

See [Section 4.1](#) for more information on how to review a district's Cohort Files. See the [Section 6.2](#) for more information on the required documentation for each of the eight codes eligible for withdrawal and [Section 6.3](#) for more information on how to upload withdrawal documentation.

## 6.2 Required Documentation for Withdrawal Codes

See below for more information on required documentation for each of the eight eligible codes eligible for cohort withdrawal. For more information on how to upload documentation to the Cohort Application, please consult [Section 6.3](#).

### 6.2.1 Withdrawal Code 2 (withdrawn to DCS Educational Placement)

- Transfer must be to an approved DCS school or institution<sup>33</sup>
  - Documentation should not merely indicate that student is transferred into DCS custody; student must receive education services culminating in a traditional high school or alternate academic diploma
- The following documentation is required:
  - Written acknowledgement on official letterhead from an administrator at the state institution that the student is receiving educational services that culminate in a traditional high school or alternate academic diploma **OR**
  - Written records request from state institution that indicates that the student has withdrawn to receive education services culminating in a traditional high school or alternate academic diploma **OR**
  - Official copy of diploma earned by student that is equivalent to a traditional high school or alternate academic diploma

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<sup>31</sup> See [20 U.S.C. § 7801\(25\)\(B\)](#).

<sup>32</sup> The department does not consider documentation for students who transfer after the last day of the semester in which the student is expected to graduate.

<sup>33</sup> Please contact [TN Department of Children's Services](#) for more information about DCS approved schools and institutions.

- With appropriate documentation, a student with a withdrawal code of 2 will be removed from the cohort; otherwise, the student will stay in the cohort and be counted against the graduation rate.

### 6.2.2 Withdrawal Code 3 (transferred to another Tennessee public school district)

- For this code, *no documentation is necessary* - once the receiving district updates the student's enrollment in EIS/TEDS, the student will be moved to the other district's cohort.
  - If the student is still appearing in the original district's cohort, the student may not have completed the enrollment process at the receiving school, or there may be an enrollment error. The sending district should contact the receiving district to reconfirm enrollment if no subsequent enrollment has appeared in EIS/TEDS.
- If the original district has documentation that the student earned either a traditional high school diploma or an alternate academic diploma after the withdrawal, it can submit an appeal during the Cohort Phase II window to remove that student from their cohort.

### 6.2.3 Withdrawal Code 4 (transferred to another public school in the same district)

- For this code, *no documentation is necessary* - once the receiving school updates the student's enrollment in EIS/TEDS, the student will be moved to the other school's cohort.

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

- If the student withdrew to an accredited out-of-state public or private high school, or registered as a home school student in another state, one of the following pieces of documentation is required:
  - Written records request from receiving out-of-state public or private high school that awards a traditional high school diploma indicating enrollment, **OR**
  - Written acknowledgement confirming enrollment on official letterhead from an administrator at a receiving out-of-state school that awards a traditional high school diploma confirming enrollment, **OR**
  - Official records/transcripts from a receiving out-of-state public or private high school that awards a traditional high school diploma confirming enrollment, **OR**
  - Official copy of diploma earned by student that is equivalent to a traditional high school or alternate academic diploma **OR**
  - Official, fully completed home school documentation from another state
- For students who have moved out of the country for whom the above documentation cannot be obtained, the following may be accepted:
  - Written confirmation from a parent or guardian of a transfer out-of-country **OR**
  - A school administrator's documented conversation with a parent or guardian confirming a transfer out-of-country **OR**

- Official deportation documentation
- For foreign exchange students, a copy of the official exchange program paperwork reflecting the year of participation on exchange agency letterhead is acceptable, provided the documentation specifies an end date for the student's exchange program.
- With appropriate documentation, a student with a withdrawal code of 5 will be removed from the cohort; otherwise, the student will stay in the cohort and be counted against the graduation rate.

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

- The documentation submitted for this withdrawal code must confirm that the student fully enrolled in and attended the private school.
  - If the documentation submitted merely states the student has “applied,” it will be denied. Districts submitting documentation for this withdrawal code should carefully review the documentation received from the private school to ensure it confirms enrollment.
  - Only students withdrawing to private schools that are accredited / award a diploma equivalent to Tennessee's traditional high school diploma or alternate academic diploma can be approved for this withdrawal code.<sup>34</sup>
- The following documentation is required:
  - Written records request from receiving non-public school confirming enrollment; **OR**
  - Written acknowledgement on official letterhead from an administrator at the receiving school confirming enrollment that includes the student's full name and date of birth; **OR**
  - Official records/transcript from the non-public school confirming enrollment; **OR**
  - Official copy of diploma earned by student that is equivalent to a traditional high school or alternate academic diploma; **OR**
  - Official non-public school reporting form<sup>35</sup>
- With appropriate documentation, a student with a withdrawal code of 6 will be removed from the cohort; otherwise, the student will stay in the cohort and be counted against the graduation rate.

### 6.2.6 Withdrawal Code 8 (deceased)

- The following documentation is required:
  - Official written documentation, such as a death certificate; **OR**
  - An obituary or funeral program that includes the students' full name; **OR**
  - A letter from the parent indicating the student has passed away
- With appropriate documentation, a student with a withdrawal code of 8 will be removed from the

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<sup>34</sup> A list of accredited Tennessee private schools is available in the [School Directory](#).

<sup>35</sup> See [T.C.A. § 49-6-3007](#).

cohort; otherwise, the student will stay in the cohort and be counted against the graduation rate.

### 6.2.7 Withdrawal Code 10 (withdrawal to in-state homeschool)

- The following documentation is required:
  - [Official Intent to Home School form](#). This form must be signed either physically or digitally by the parent of the student, regardless of the student’s age. If the parent signs the form digitally, there must be a digital time stamp with the signature.
  - If a district uploads documentation other than the Intent to Home School form, or the form is not fully complete and properly signed by the student’s parent, the documentation will be denied.
  - Parents must check “yes” that they have received a high school diploma or high school equivalency credential in compliance with [Tenn. Code Ann. § 49-6-3050\(a\)\(2\)\(B\)](#)
  - Example of appropriate digital signature

**Part 3. Health Records**

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

John Smith	Digitally signed by John Smith Date: 2023.10.03 15:32:54 -05'00'	10/3/23
Parent/Guardian Signature		Date

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

### 6.2.8 Withdrawal Code 11 (court-ordered placement, such as jail or prison)

- The following documentation is required:
  - Official, written documentation confirming student remand to jail, prison, or juvenile correctional facility
  - Documentation should indicate permanent student incarceration, not merely that the student was detained and is awaiting adjudication

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

- The following documentation is required:
  - Written records request from the online school; **OR**
  - Written acknowledgement on official letterhead from an administrator at the online school confirming enrollment that includes the student’s full name; **OR**
  - Official records/transcripts from the online school confirming enrollment; **OR**
  - Official copy of diploma earned by student that is equivalent to a traditional high school or

alternate academic diploma

- Documentation must confirm enrollment in nonpublic out-of-state private online school, not merely application.
- Withdrawal code 17 should **only** be used for students who withdraw from traditional brick-and-mortar schools to enroll in a school in which the content is delivered via the Internet, the school is nonpublic, and the school location is not in Tennessee.
- With appropriate documentation, a student with a withdrawal code of 17 will be removed from the cohort; otherwise, the student will stay in the cohort and be counted against the graduation rate.

### 6.3 Uploading Withdrawal Documentation

Districts can upload withdrawal documentation for a given student on the Cohort Data page using the following steps:

1. Navigate to the [Cohort application](#) and log in through Single Sign On.
2. Select the “User” option under “Log on As...” for the Cohort application.
3. Read the News and Timeline sections on the Instructions page of the Cohort application.
4. Click the checkbox that says, “I agree / I acknowledge that I have read the news.”
5. Click the “Show Data” button.
6. Select the student’s graduation cohort year from the drop-down menu (e.g., 2025-2026)
7. Enter the state student ID (Legacy SSID) in the “Statewide Student Key” box or navigate to the student for whom the district would like to upload documentation
8. Click the “Attach” link in the Upload Document column<sup>36</sup>
9. Click “Choose File” to select a file
10. Click “Upload” to complete document upload

#### 6.3.1 Mass Upload Feature

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 (Legacy SSID) 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

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<sup>36</sup> If a student lacks an “Attach” column, please confirm that student has an eligible withdrawal code for his/her most recent non-adult enrollment in EIS.

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 (Legacy SSID).

**Important.** Please note that the department will deny any withdrawal documentation submitted to remove students from the cohort past the specified timeline as presented in [Table 1](#).

District cohort contacts will receive emails when withdrawal documentation uploaded to the Cohort application is denied. These emails are automatically generated. If you have any questions concerning why documentation was denied, please reach out to [TNED.Graduates@tn.gov](mailto:TNED.Graduates@tn.gov).

## Section 7: Cohort Change Requests

Throughout the Phase I process, districts should submit cohort change requests as necessary to correct cohort membership status for all members of the 2025-2026 graduation cohort.<sup>37</sup>

Information on the timeline for submitting cohort changes, required documentation, and submission procedures is included in this section.

### 7.1 Cohort Change Submission Timeline

All Cohort Change requests must be submitted to the department following the timeline specified in [Table 6](#). Districts are highly encouraged to submit the requested changes and the acceptable documentation<sup>38</sup> as early as possible to allow time for questions and resubmission of appeals as needed.

- District submission dates.** As presented in [Table 6](#), there are 14 district submission windows for Cohort Change requests. Districts can submit requests during any of the submission windows. Districts can submit multiple worksheets across multiple submission windows. Each submission must include a [change request worksheet](#) **AND** documentation needed to support each change request. The last date to submit a cohort change request is by **9 p.m. CDT on June 5, 2026**.
- TDOE Review and Approval Period.** Following each district submission date, the department will review and process the change requests submitted to date during the review and approval period. If the requests are approved, students' cohort status will be updated on the Cohort application by the last day of the department review and approval period.

Following each department review and approval period, districts will be notified with the requests that have been denied via email. If the requests are denied due to incomplete or inaccurate documentation, districts are encouraged to submit supplementary documentation during the Phase I remediation period. The last date to submit acceptable documentation to resolve any cohort change requests that were initially denied is **9 p.m. CDT on June 19, 2026**. The department will not review any documentation submitted past the deadline.

**Table 6. Cohort Change Request Submission Timeline**

Submission Period	District Submission Date	TDOE Response Deadline
1	March 5, 2026	March 9, 2026
2	March 12, 2026	March 16, 2026
3	March 19, 2026	March 23, 2026
4	March 26, 2026	March 30, 2026
5	April 2, 2026	April 6, 2026
6	April 9, 2026	April 13, 2026

<sup>37</sup> For suggestions for how districts can identify errors in student cohort membership, please consult [Section 4](#).

<sup>38</sup> See [Section 7.2](#) for more information on acceptable documentation.

Submission Period	District Submission Date	TDOE Response Deadline
7	April 16, 2026	April 20, 2026
8	April 23, 2026	April 27, 2026
9	April 30, 2026	May 4, 2026
10	May 7, 2026	May 11, 2026
11	May 14, 2026	May 18, 2026
12	May 21, 2026	May 26, 2026
13	May 28, 2026	June 1, 2026
14	June 5, 2026	June 8-12, 2026

## 7.2 Cohort Change Request Appealable Issues and Required Documentation

The following issues can be addressed by submitting a cohort change request and appropriate documentation.

### 7.2.1 Incorrect Cohort Year

If a student is appearing in the incorrect cohort year in the cohort application, the district may submit a cohort change request to move the student to their correct cohort year with documentation attached to support the request.

Required Documentation: Student’s transcript that confirms the student’s correct 9<sup>th</sup> grade entrance year.<sup>39</sup>

**Important:** Students cannot be moved to a previous cohort year that has already been finalized.

### 7.2.2 Duplicate Student ID

If the same student appears to be reflected across multiple Student IDs in the Cohort application, the district must complete the following steps:

1. Determine which ID is the correct ID and which ID is an erroneously generated duplicate.
2. Check *both* EIS and TEDS for the duplicate ID. If the duplicate ID is still present in *either* EIS or TEDS, please email [DT.Support@tn.gov](mailto:DT.Support@tn.gov) and ask them to remove the duplicate ID from any database in which it is present.
3. Once the duplicate ID is confirmed by [DT.Support@tn.gov](mailto:DT.Support@tn.gov) as having been removed from both EIS and TEDS, submit a cohort change request to exclude the duplicate ID from the cohort.

Required Documentation: Correspondence with [DT.Support@tn.gov](mailto:DT.Support@tn.gov) confirming the duplicate ID has been removed from EIS/TEDS and an attestation from a school administrator that the duplicate ID and the active ID were, in fact, created for the same student.

<sup>39</sup> Note that if a student repeated 9<sup>th</sup> grade, the first year the student was enrolled in 9<sup>th</sup> grade must be used as the student’s cohort year; the student cannot be moved to the cohort matching a subsequent 9<sup>th</sup> grade year.

### 7.2.3 9<sup>th</sup> Grade No-Show/District Enrollment Error

If a student is expected to attend a high school at the beginning of the 9<sup>th</sup> grade year but never shows up, or a student's enrollment "rolls up" to a high school that he or she never actually attends, that student may be removed from the cohort. In this case, districts should

- Submit a Cohort Change Request to exclude the student from the cohort

**Required Documentation:** Letter on official letterhead from a school or district administrator where he or she attests that the student(s) in question never attended school during grade 9 or higher in the district.

**Important:** For a 9<sup>th</sup> grade "no-show" appeal to be approved, the student's enrollment must start and end on the same day or end before the school's calendar year begins.<sup>40</sup> If a student shows up and attends 9<sup>th</sup> grade for any length of time and later withdraws, they are not eligible for this appeal.

### 7.2.4 Set Included in Cohort Value to "Y"

After a successful Cohort Phase I appeal to exclude a withdrawn or "no-show" student from the Cohort, students are marked as "N" for the INCLUDED\_IN\_COHORT variable. Students marked this way will not be included in graduation rate calculations even if they are included in the file for a given Cohort Year. If a student who should be included in the cohort is marked as excluded in error, districts should

- Submit a Cohort Change Request to correct this status

**Required Documentation:** Explanation from district staff explaining why student should be included in the graduation rate with their assigned graduation year along with documentation of student enrollment.

## 7.3 Submitting a Cohort Change Request

Please download the [Cohort Change Request Worksheet<sup>41</sup>](#), fill it out, and submit it using the following steps. Districts may submit as many change request worksheets as needed by **9 p.m. CDT, June 5, 2026**. Each successive district submission should only include new requests.

### 7.3.1 Fill Out Contact Information Tab

1. Navigate to the Contact Information tab.
2. Enter a valid date in cell B2 (format: MM/DD/YYYY).
3. Enter your district number in cell B3.
  - a. This should automatically populate your district name, director's name, director's email, graduation contact name, and graduation contact email in cells B4-B8.
4. Enter the name of the person who serves as the point contact for graduation cohort data in cell B7, if it is not automatically populated with the most updated contact.

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<sup>40</sup> Because "end date" in EIS indicates the first day a student was *not enrolled* at a school, the enrollment start date and end date may be separated by one day for the purposes of this appeal, for example "Begin Date = 08/05/2025" and "End Date" = 08/06/2025.

<sup>41</sup> Versions of the Cohort Change Request worksheet from previous years will not be accepted.

5. Enter the email address of the graduation point of contact in cell B8, if it is not automatically populated with the most updated email address.

### 7.3.2 Fill Out Cohort Changes Tab

1. Navigate to the Cohort Changes tab.
2. Enter a student's state ID (Legacy SSID) into column A.
  - a. If you have completed the "Contact\_Info" tab correctly, your district number and name will automatically populate.
  - b. For student ID mergers, please list the ID that should be **excluded** from the cohort.
3. Enter the student's school number in column D.
  - a. School numbers can be identified in the Cohort application and in the files that are downloadable on the "Cohort Data" page of the application.
4. Enter the student's last name in column E.
5. Enter the student's first name in column F.
6. Enter the appeal reason (with requested change in parentheses) from the dropdown menu in column G.
  - a. If requesting to move the student to a different cohort year, please select the cohort year that corresponds with *the year the student first entered 9<sup>th</sup> grade*.
7. Enter an explanation for the request in column H.

### 7.3.3 Saving the Cohort Change Request Worksheet

Save the Cohort Change Request Worksheet as an **Excel file** using the following naming convention: **"###\_Change\_Request\_Worksheet\_20YYMMDD,"** where ### is your **district number** and 20YYMMDD is the **date of submission**. For example, if district 99 submitted their worksheet on Feb. 24, 2026, the file would be named 099\_Change\_Request\_Worksheet\_20260224.

### 7.3.4 Saving Cohort Change Request Documentation

Please submit student documentation as a **single PDF file** containing documentation for **all students** being submitted for changes in the current workbook **in the order in which the students appear**. Please follow the naming convention below:

- **###\_Change\_Request\_Documentation\_20YYMMDD**, where ### is your **district number** and 20YYMMDD is the **date of submission**.

### 7.3.5 Submitting the Cohort Change Request Form

Districts must submit cohort change requests through the [Graduation Cohort Change Request](#) form. The person submitting the change request must have an Orion/SSO account in order to submit the form. Districts must submit the following information:

- District Number
- District Name

- Name and Email of person submitting form
- Director of Schools Name
- Director of Schools Email
- Cohort Change Request Worksheet
  - Must be submitted as an Excel file with the naming convention **###\_Change\_Request\_Worksheet\_20YYMMDD** where **###** is your **district number** and **20YYMMDD** is the **date of submission**.
- Supporting Documentation
  - Must be submitted as a PDF file with the naming convention **###\_Change\_Request\_Documentation\_20YYMMDD**, where **###** is your **district number** and **20YYMMDD** is the **date of submission**.
  - **Important Note:** documentation must be provided for each student being appealed. Failure to include supporting documentation will result in a denial.

Submissions must follow the schedule outlined in [Table 6](#) and should be submitted no later than **9 p.m. CDT** on the day outlined. Once the review period ends, please confirm the changes were made correctly. Please provide feedback to [TNEG.Graduates@tn.gov](mailto:TNEG.Graduates@tn.gov) if the changes have not been made appropriately.

**Important.** If districts fail to submit cohort change requests, students may be assigned to the wrong graduating cohort and/or may be counted as a non-graduate in the graduation rate. Student cohort membership *cannot* be corrected after Phase I.

## Section 8: Phase I Final Checks

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

1. Did the district submit completion information for cohort graduates and verify that the information was loaded into the Cohort application?
2. Did the district submit completion information for TISA graduates and verify the TISA graduate roster released on June 12<sup>th</sup>?
3. Did the district submit withdrawal information for all applicable students and verify that the information loaded into the Cohort application?
4. Did the district upload documentation for all students with withdrawal codes of 02, 05, 06, 08, 10, 11 and 17 that satisfies the requirements outlined in this guidance document?
5. Did the district verify that the list of students in the Cohort application matches the list of fourth year students in the district's SIS package (i.e., there are no students who, by virtue of a data entry error, were entered into the incorrect cohort)?
6. Did the district review the Potential Cohort Issues report uploaded to the Accountability Application's File Downloads page at the start of Phase I?

## Section 9: Phase II and III Tasks and Appealable Issues

The following sections provide a brief overview of the required tasks and appealable issues for districts during Phases II and III of the Graduation Cohort Process.

For a complete timeline of Phases II and III, please see [Table 1](#). For more specific information regarding how to submit Phase II and III appeals and required documentation, districts should consult the 2025-2026 Graduation Cohort Phase II and III Guide, available in Summer 2026 on the Accountability [website](#) and on the Cohort Application.

### 9.1 Phase II Tasks and Appealable Issues

See below for a brief discussion of district tasks to complete during Phase II.

#### 9.1.1 Entering Summer Graduate Information

Districts should submit completion information for summer cohort graduates and verify that the data has loaded correctly in the Cohort application during Phase II. If students are not accurately reflected in the data file, districts should correct TEDS data as appropriate. The department will also update the TISA graduate roster to include summer graduates and release the updated file on the Accountability application on August 8; districts should review the updated roster to ensure summer TISA graduates are accurately reflected in the TISA Graduates data file.<sup>42</sup>

All completion information for summer graduates in both the graduation cohort and graduating class should be submitted by **August 13, 2026**. The department will make a final TISA roster update by August 14 and release the data on the Accountability application. At that point, the TISA Graduate Roster is then final and can no longer be appealed.

#### 9.1.2 Phase II Appealable Issues

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

##### **60-Day Reassignment (updated)**

In general, students count in 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.

At the start of Cohort Phase II, the department will reassign students in the 2025-26 cohort who meet the 60-Day Reassignment criteria and 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

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<sup>42</sup> See [Section 3](#) for more information on the difference between the graduation cohort and graduating class.

another school's cohort was not reassigned, it can submit a Phase II appeal.

**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).

### ***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.<sup>43</sup> 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 compile a list of alternative school students from the 2025-26 cohort who do not have a primary enrollment in a traditional high school in the district in which they are currently enrolled. The department will reassign these students to the largest high school within the district. 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.

### ***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 approved by the department in an earlier appeals Phase.

### ***Student Completed Diploma Program After Withdrawal from Cohort School***

If a district has evidence that a student not eligible for appeal during Phase I completed a traditional high school or alternate academic diploma after withdrawing from the school to which that student is currently assigned for purposes of the graduation cohort, the district can submit an appeal during the Phase II submission window to remove that student from the cohort.

### ***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. When a system error occurs, districts should email [DT.Support@tn.gov](mailto:DT.Support@tn.gov) immediately to resolve the issue and notify the department at [TNEG.Graduates@tn.gov](mailto:TNEG.Graduates@tn.gov) of the ongoing issue. A copy of this correspondence as well as a screenshot of the submission error message must be submitted with the

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<sup>43</sup> 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.

district's appeal as documentation. Both pieces of required documentation must be dated/time stamped *prior* to the Phase I deadline in order to be accepted.

All Phase II appeals must be submitted by **9 p.m. on July 31, 2026** to be considered. Any appeals submitted after the deadline will not be reviewed.

For more detailed information regarding how to submit Phase II appeals, including submission procedures and required documentation, districts should consult the 2025-2026 Graduation Cohort Phase II and III Guide, available starting in Summer 2026 on the Accountability [website](#) and the Cohort Application.

### 9.1.3 Import Student Transcript Data in EIS/TEDS

Student transcript and course enrollment data is used by the department to exclude students from the federal graduation rate at the start of Phase III<sup>44</sup>. Therefore, districts should make sure to import complete student transcript data and course enrollment data to EIS and TEDS<sup>45</sup> for the 2026 graduating cohort and resolve any errors by **August 13, 2026**.

**Important.** Districts that do not import complete student transcript data for the graduating cohort may see students erroneously excluded from the federal graduation rate at the start of Phase III. Having complete transcript data in TEDS will prevent unnecessary appeals during Phase III.

## 9.2 Phase III Tasks and Appealable Issues

See below for a brief discussion of district tasks to complete during Phase III.

### 9.2.1 Phase III Appealable Issues

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 approved by the department in an earlier appeals Phase.

#### ***Federal Graduation Rate Appeal***

As discussed in [Section 2.2](#), 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. By the end of Phase II, districts should confirm that all student transcript and course enrollment data for students in the 2025-26 Cohort is correct in EIS/TEDS.<sup>46</sup> The department will then use

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<sup>44</sup> For more information on the exclusion list, as well as the difference between the federal graduation rate and the Tennessee graduation rate, please consult [Section 2.2](#).

<sup>45</sup> Course transcript and course enrollment data from 2025-26 will be pulled from TEDS; EIS data will be used as the source for course transcript and course enrollment data from earlier years.

<sup>46</sup> Course transcript and course enrollment data from 2025-26 will be pulled from TEDS; EIS data will be used as the source for course transcript and course enrollment data from earlier years.

the enrollment data and student transcript data, when available, to identify an **exclusion list** comprised of students who should be removed from the numerator of the federal graduation rate calculation per federal guidelines. The exclusion list will include any students who received a 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\(13\)\(a\)](#).

At the start of Phase III, districts will be able to download the exclusion list from the Accountability application. Districts should review the exclusion list and submit appeals for students that were incorrectly excluded from the federal graduation rate. At the end of Phase III, the federal graduation rate is final.

### **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. When a system error occurs, districts should email [DT.Support@tn.gov](mailto:DT.Support@tn.gov) immediately to resolve the issue and notify the department at [TNEG.Graduates@tn.gov](mailto:TNEG.Graduates@tn.gov) of the ongoing issue. A copy of this correspondence as well as a screenshot of the submission error message 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 or Phase II deadline in order to be accepted.

All Phase III appeals must be submitted by **9 p.m. CT on September 4, 2026**, to be considered. Any appeals submitted after the deadline will not be reviewed.

For more detailed information regarding how to submit Phase II appeals, including submission procedures and required documentation, districts should consult the 2025-2026 Graduation Cohort Phase II and III Guide, available starting in Summer 2026 on the Accountability [website](#) and the Cohort Application.

## **9.3 End of 2025-26 Graduation Cohort Process**

The Phase III Final Response issued by the department on **October 2, 2026**, concludes the 2025-26 Graduation Cohort Process. The department will release the graduation rates, including both the Federal Graduation Rate and Tennessee Graduation Rate, on the Accountability application. At this stage, all Cohort and Graduation data for 2025-26 graduating cohort are final.

**Important.** Following the Phase III Final Response, all Cohort and Graduation data are under embargo until a news release in the fall of 2026 on a date to be announced.

## Section 10: Conclusion

We hope this guide helps navigate the first phase of the graduation cohort process. Information regarding Phases II and III tasks will be discussed in detail in the Phases II & III protocol to be released in the spring of 2026. Please feel free to provide feedback on this document or share any recommendations for support resources to [TNEG.Graduates@tn.gov](mailto:TNEG.Graduates@tn.gov). Thank you for your continuing efforts to ensure that your district's graduation rate data are as accurate as possible.

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