



Department of Education

2025-26 Graduation Cohort Phases II-III Appeals FAQ

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Frequently Asked Questions

This document provides districts with an overview of the 2025-26 Graduation Cohort Phases II-III appeals process and answers common questions related to key dates, 60-day reassignment, Tennessee and federal graduation rate calculations, and federal graduation rate verification. It is intended to support district staff in reviewing cohort data, understanding appealable issues, and navigating the steps required to submit accurate and timely appeals.

Process Overview

1. What are the key dates for the 2025-26 Cohort Phase II-III Appeals Process?

Phase II Key Dates

- District Appeals Submission Window: July 13-31
- Initial Response / TISA Roster Update: August 7
- Remediation Window: August 10-12
- Completion Submission Deadline: August 13
- Final Response / TISA Roster Update: August 14

Phase II data appeals should be submitted by **9 p.m. CT on July 31, 2026**.

Completion information submission for summer graduates should be finalized by **9 p.m. CT on August 13, 2026**. The Tennessee Graduation Rate and the TISA Roster will be finalized by the end of Phase II.¹

Phase III Key Dates

- District Appeals Submission Window: August 24-September 4
- Initial Appeals Response: September 18
- Remediation Window: September 21-25

¹ For more information on the Tennessee Graduation Rate and the TISA Roster, please consult Sections 2 and 3 of the [2025-26 Graduation Cohort Phase II-III Guide](#).

- Final Response: October 2

Phase III data appeals should be submitted by **9 p.m. CT on September 4, 2026**. The Federal Graduation Rate will be finalized by the end of Phase III.

Please refer to the [2025-26 Cohort Phase II-III Appeals Guide](#) for more information regarding the required tasks for Phase II-III appeals.

60-Day Reassignment

2. What action should be taken by a district for a student who spent less than 60 days in the same high school in his or her most recent school year?

Per [Tenn. Code Ann. § 49-1-601\(a\)](#), 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 may 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 these criteria. All students moved as a result of this process will be listed in a district's Cohort Reassignment File (available on the Accountability Application). If, after reviewing this file, a district believes that a student was reassigned to or from their school in error, or that a student that should have been reassigned to another school's cohort was not reassigned, it can submit a Phase II appeal. For more information on submitting a 60-Day appeal, please consult Section 4.2 of the [2025-26 Cohort Phase II-III Appeals Guide](#).

3. What action should be taken by a district that receives a student because of a 60-Day Reassignment?

As discussed in [Q2](#), the department will release a Cohort Reassignment File at the start of Phase II that contains all students reassigned as a result of the 60-Day Reassignment rule. If, after reviewing this file, a district believes that a student was reassigned in error, it can submit a Phase II appeal. For more information on

submitting a 60-Day appeal, please consult Section 4.2 of the [2025-26 Cohort Phase II-III Appeals Guide](#).

4. Is the 60-Day Reassignment process based on days enrolled or days attended?

The 60-Day Reassignment process incorporates both days enrolled and days attended (days enrolled minus days attended). Students are eligible for a 60-Day Reassignment if they attended their last school in their last year for less than 60 instructional days. For example, a district may appeal for a student who was enrolled at School A for 80 days in their final school year but only attended School A for 59 days.

Students who are eligible for a 60-day reassignment are reassigned to a school on the basis of days enrolled. For example, consider a student whose last enrollment in their most recent school year was 29 days attended (30 days enrolled) at School A. The student was enrolled at School B for 230 instructional days across 9-12 (attending school for 200 of those days) and was enrolled at School C for 220 instructional days across 9-12 (attending school for 210 of those days). The student would be reassigned to School B.

For a detailed breakdown of the 60-Day reassignment business rules, please consult Appendix A of the [2025-26 Cohort Phase II-III Appeals Guide](#).

Federal vs Tennessee Graduation Rates

5. Why does Tennessee calculate two different four-year graduation rates?

Since the 2022-23 school year, Tennessee has calculated a Tennessee Graduation Rate and a Federal Graduation rate.

Currently, [SBE Rule 0520-01-03-.06\(12\)\(c\)](#) and [SBE Rule 0520-01-03-.06\(13\)\(a\)](#) provide an alternative pathway toward a regular diploma for students with a qualifying disability who have deficits in mathematics and science as documented in their Individualized Education Program (IEP), allowing these students to earn a regular diploma without completing all of the required higher-level mathematics

and science courses. This alternative pathway conflicts with federal guidelines, however, which require the department to calculate the four-year graduation rate by only including students who complete all required coursework in all subject areas and graduate on time² with a regular (traditional high school) diploma or an Alternate Academic Diploma (AAD). Therefore, students who use the alternative pathway to earn a regular diploma are counted in the Tennessee graduation rate but not in the federal graduation rate.

For more information on the difference between the federal graduation rate and the Tennessee Graduation Rate, please see Section 2 of the [2025-26 Cohort Phase II-III Appeals Guide](#).

6. How is the federal graduation rate used in school accountability?

The federal graduation rate is used to evaluate school performance on the Graduation Rate indicator. It is also used to identify Priority/Comprehensive Support and Improvement (CSI) and Additional Targeted Support and Improvement (ATSI) schools. Any school with a graduation rate of less than 67 percent will earn Priority/CSI status; any school with a graduation rate of less than 67 percent for a given student group will earn ATSI designation during an identification year.

7. How is Tennessee graduation rate used in school accountability?

The Tennessee graduation rate is used to evaluate school performance on the College and Career Readiness (CCR) indicator for both federal and state accountability. Additionally, students who receive a regular diploma per SBE's graduation rule and policy will be used in the denominator of the ACT/SAT participation rate calculation.

² According to federal guidelines, a student graduates "on-time" if they graduate within four years and a summer after entering ninth grade for the first time.

8. How are the federal graduation rate and the Tennessee graduation rate used in district accountability?

Both the federal graduation rate and the Tennessee graduation rate are used to evaluate district performance on the Graduation Rate indicator. Specifically, districts are measured across three pathways:

- absolute performance, which represents the percent of graduates per federal definition (i.e., federal graduation rate);
- graduation rate AMO targets, calculated based on the federal graduation rate); and
- value-added measure, which calculates the difference in the district's percent of students meeting CCR status to the prior year as compared to statewide performance.

CCR Rate is based on percentage of Tennessee graduates (not federal graduates) who meet the CCR status. Tennessee's graduation rate procedure is used to produce the CCR Rate. The final score for the district Graduation Rate indicator is the value-added score averaged with the better score between their absolute performance and AMO targets.

9. Which graduation rates will be publicly released?

Both the federal and Tennessee graduation rates will be publicly released on the [Data Downloads webpage](#) following a news release in the fall of 2026 at a date to be announced.

10. Which graduation rate will be used for teacher evaluations?

For educator evaluation, the department will continue to use the Tennessee graduation rate as an achievement measure option. For more information regarding teacher evaluation, please contact Team.Questions@tn.gov.

Federal Graduation Rate Verification

11. How will the department verify the federal graduation rate?

Using enrollment and student transcript data from EIS/TEDS, the department will identify an exclusion list comprised of students who *are* counted as graduates in the Tennessee Graduation Rate but will be counted as non-graduates in the federal graduation rate calculation per federal guidelines. The exclusion list will include any students who utilized the exemptions from required coursework provided by [SBE Rule 0520-01-03-.06\(12\)\(c\)](#) and [SBE Rule 0520-01-03-.06\(13\)\(a\)](#).³

To construct the exclusion list, the department will start with a list of traditional high school diploma graduates in the 2025-26 cohort. Then, the department will use course transcript and enrollment data from EIS/TEDS to remove all students that have completed both higher-level math (i.e., Algebra II, Integrated Math III, or a college-level substitute) and higher-level science (i.e., Chemistry, Physics, or a college-level substitute).⁴

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

³ Students who took Math or Science exemption courses for special education students but subsequently completed all Math and Science credits normally required for a regular diploma will not be included in the exclusion list.

⁴ For more information on state requirements for mathematics and science as well as approved substitutions, please consult [SBE Policy 3.103](#).

12. Where can districts download their exclusion list?

Districts may download the exclusion list from the Accountability application's File Downloads page. Districts should navigate to the "2025-26 Graduation Rate Files" heading and find the file called "Graduation Cohort Federal Verification File."

13. How can districts appeal a student excluded from their federal graduation rate?

Districts should carefully review the list of students excluded from the federal graduation rate and confirm that it only includes students who utilized exemptions from required coursework provided by [***SBE Rule 0520-01-03-.06\(12\)\(c\)***](#) and [***SBE Rule 0520-01-03-.06\(13\)\(a\)***](#) and did not complete all required coursework in mathematics and science.⁵ Districts shall submit appeals ONLY for students who completed all required coursework in mathematics and science and earned a traditional high school diploma but were erroneously excluded from the federal graduation rate.⁶ Districts must submit a transcript as supporting documentation. For more information on appealable issues and appropriate supporting documentation for verifying the federal graduation rate, please refer to Section 5 of the [***2025-26 Cohort Phase II-III Appeals Guide***](#).

14. How will the department review student transcripts submitted during a federal graduation rate appeal?

The department will look for confirmation that the student earned 1.0 credits for all required higher-level math (i.e., Algebra II, Integrated Math III, or a college-level substitute) and higher-level science courses (i.e., Chemistry, Physics, or a college-level substitute).

⁵ Students who took Math or Science exemption courses for special education students but subsequently completed all Math and Science credits normally required for a regular diploma will not be included in the exclusion list.

⁶ For more information on state requirements for mathematics and science as well as approved substitutions, please consult [SBE Policy 3.103](#).

If the transcript/SIS report does not show that the students earned full credit for each required course, the appeal will be denied. Districts should highlight all the courses on the student's high school credits used to satisfy mathematics and science graduation requirements. For more information on state requirements for mathematics and science as well as approved substitutions, please consult [**SBE Policy 3.103.**](#)

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