



# 2022 Graduation Cohort: Phase II-III Appeals Guide

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# Section 1: Overview

The graduation rate process occurs in four phases (see Table 1). **Phase I** concludes on July 1, 2022. By the end of Phase I, districts should have updated and corrected student information and uploaded required documentation for the corresponding withdrawal codes and completion codes entered in EIS. During **Phase II**, districts have three major tasks: (1) report summer graduates; (2) upload required documentation for seniors withdrawing since the last week of Phase I **only**<sup>1</sup>; and (3) submit appeals only for appealable situations (see [Section 3.1](#)). In **Phase III**, districts have two major tasks: (1) submit appeals for summer graduates only for appealable situations (see [Section 3.1](#)); and (2) review preliminary graduation rates in the Cohort application. In **Phase IV**, districts will review the finalized graduation rates before they are released on the department’s [Data Downloads](#) webpage.

Districts must be actively engaged in the cohort process as the graduating cohort data will be utilized for the ACT<sup>2</sup> participation calculation and the subsequent determination for the *Ready Graduate*<sup>3</sup> status. Once the data are finalized by the end of the cohort process, data related to the graduating cohort are final and cannot be appealed afterward.

This document provides specific guidelines for the 2022 graduation cohort and explains what, how, and when districts may appeal during Phases II and III. The appeals process allows districts to resolve issues related to graduation cohort calculations within state and federal guidelines. During the appeals process, districts shall focus on the appealable issues specified in [Section 3.1](#). Non-appealable issues listed in [Section 3.2](#) should have been addressed during Phase I; hence, they are not appealable during the appeals process.

**Table 1. Key Dates and Tasks for Each Phase of the Graduation Rate Process**

Phase	Estimated Dates	Tasks to be Completed
I	January 31, 2022–July 1, 2022	<ul style="list-style-type: none"> <li>Request removal of students from the cohort (e.g., duplicate students, students in middle school, students who never attended, students in the wrong cohort, etc.) (see <a href="#">Cohort Change Instructions</a> for more guidance).</li> <li>Correct/submit withdrawal codes and upload required documentation for withdrawn students.</li> <li>Document early graduates with withdrawal code 12 and appropriate completion type, date, and period.</li> <li>Submit completion information to EIS.</li> <li>Reconcile enrollments with receiving schools for students withdrawn using codes 3 or 4 and for whom there is no subsequent enrollment in EIS.</li> </ul>
II	July 18–Aug. 5, 2022	<ul style="list-style-type: none"> <li>Report summer graduates in EIS.</li> <li>Submit appeals only for appealable situations.</li> <li>Upload required documentation for seniors withdrawing since the last week of Phase I <b>only</b>.</li> </ul>

<sup>1</sup> All documentation for students who withdrew during Phase I should be submitted in Phase I with one exception- Districts can submit the required documentation for students who withdrew since the last week of Phase I in Phase II. This gives districts sufficient time to locate and provide appropriate documentation for the last minute withdrawals. In Phase II, the department will not review any new documentation for seniors that have a withdrawal date before June 27.

<sup>2</sup> ACT participation rate = The number of students who graduated in four years plus a summer with a valid ACT score / The number of students who graduated in four years plus a summer\*100

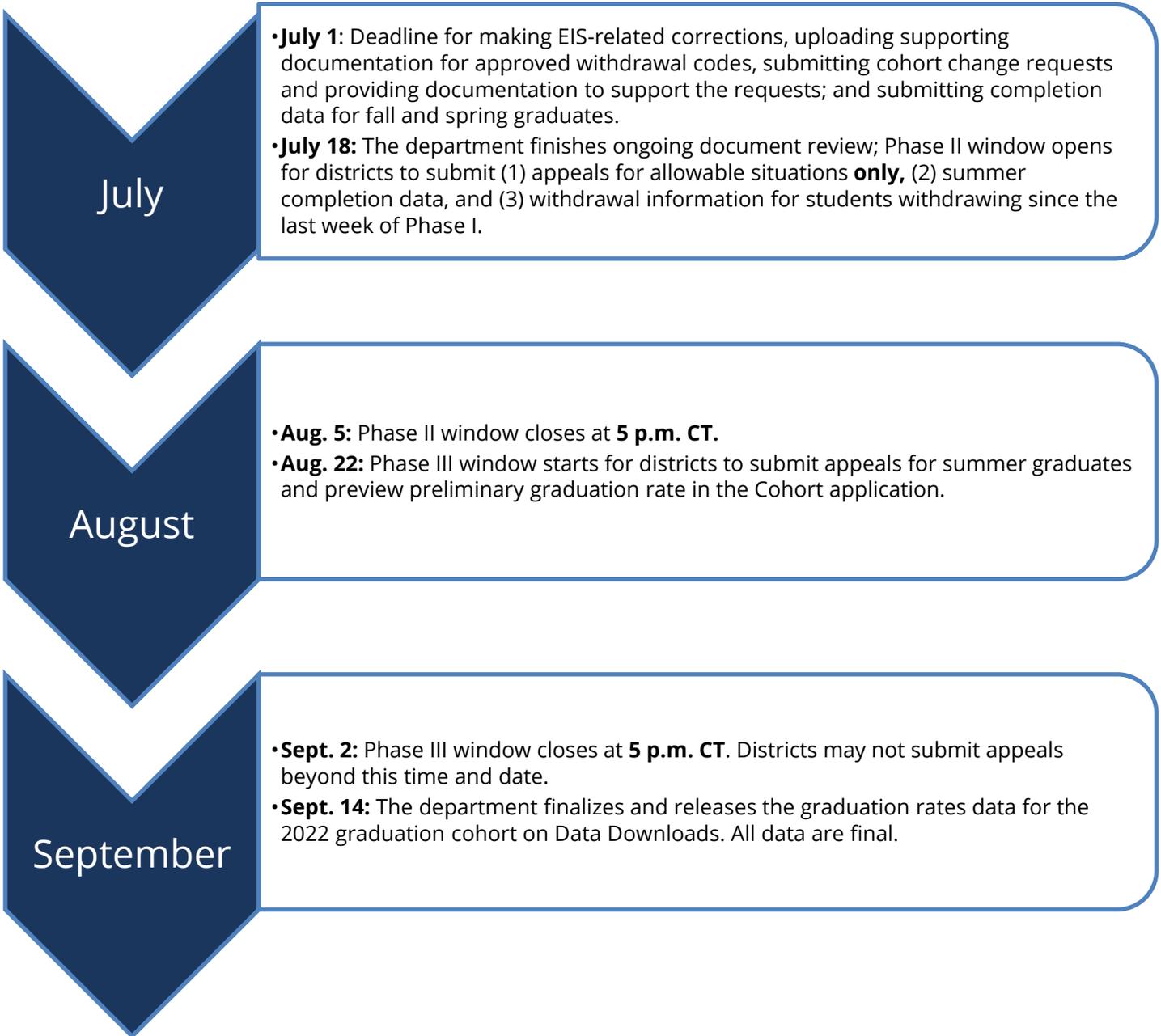
<sup>3</sup> *Ready Graduate* = The number of students who graduated in four years plus a summer meeting *Ready Graduate* criteria / The number of students in the graduating cohort\*100

Phase	Estimated Dates	Tasks to be Completed
III	Aug. 22–Sept. 2, 2022	<ul style="list-style-type: none"> <li>• Submit appeals for summer graduates.</li> <li>• Review preliminary graduation rates published in the Cohort application.</li> </ul>
IV	Sept. 14, 2022	<ul style="list-style-type: none"> <li>• All data are final.</li> <li>• Districts review final graduation rates prior to data being released in data downloads or State Report Card.</li> </ul>

## Section 2: Cohort Process Timeline

There are two phases for district appeals. Phase II appeals window will **begin on July 18** and will **conclude at 5 p.m. CT on Aug. 5**. Phase III appeals window will **begin on Aug. 22** and will **conclude at 5 p.m. CT on Sept. 2**. Districts **may not** submit cohort appeals outside of these two windows. Detailed instructions for submitting appeals are in [Section 5](#).

The timeline below outlines important dates in the cohort process:



## Section 3: Cohort Appeals Parameters

### 3.1 Appealable Situations

This section describes appealable situations during Phases II and III.

#### Department Errors

1. The district has **written confirmation of approval** from the department that committed to making an update in the Cohort application but did not do so (e.g., moving students from the current cohort to next year's cohort).
2. The district's EIS extracts failed to process **before** the prior deadline.
3. The department denied documentation submitted that meets the criteria in the [2022 Graduation Cohort Protocol](#) for students withdrawn with any of the withdrawal codes below:
  - **Code 2:** transferred to a state institution with an education program culminating in a regular high school diploma
  - **Code 5:** transferred out of state
  - **Code 6:** transferred to and enrolled in a non-public school in Tennessee
  - **Code 8:** deceased
  - **Code 10:** withdraw to home school
  - **Code 17:** transferred to and enrolled in an out-of-state online school

#### Special Circumstances

4. The district has documentation that a student who was remanded to jail or prison received an on-time regular diploma.
5. The district has documentation that a student withdrew directly to a home school in another Tennessee district. The district should submit a copy of the signed Intent to Home School form on file in the receiving district.
6. The district has documentation that a student who withdrew directly to the adult or alternative high school of another Tennessee district received an on-time regular education diploma.<sup>4</sup>
7. The district has documentation that a student who withdrew to Job Corps received an on-time regular education diploma.
8. The district has documentation that a student who was enrolled for less than 60 days of the most recent school year should be reassigned to the high school at which the student was enrolled for the greatest proportion of school days in grades 9–12. [TCA §49-1-601](#) requires the department to count these students in the cohort of the school and district in which the student was enrolled for the greatest proportion of days during high school.<sup>5</sup>

Table 2 provides guidance on the above appealable scenarios and some other common Cohort Scenarios and the appropriate actions for resolving them.

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<sup>4</sup> Adult high schools and alternative high schools do not have official cohorts.

<sup>5</sup> Such students may only be moved during the appeals process. Consequently, preliminary graduation rates available on the Cohort application during Phase III may include students that did not appear in districts' cohorts as of the July 1 deadline, as required by state law. The department will send notifications to any districts affected by such changes.

**Table 2. Guidance on Appealable and Other Common Cohort Scenarios**

	Scenario	Guidance
1	The department did not apply an approved cohort change request.	<ul style="list-style-type: none"> <li>The district may appeal if there is documentation (e.g., email correspondence, cohort change request submission, etc.) that the department committed to making the update.</li> </ul>
2	The district's EIS extracts failed to process.	<ul style="list-style-type: none"> <li>The district may appeal if there is evidence that the extract failed <b>before</b> the deadline.</li> <li>A screenshot of the extract submission error message, including the date and time stamp, may be used to document the error.</li> </ul>
3	The department denied documentation for students withdrawn via codes 2, 5, 6, 8, 10, or 17.	<ul style="list-style-type: none"> <li>The district may appeal <b>only if</b> there is evidence that the documentation satisfies the guidelines in the <a href="#">2022 Graduation Cohort Protocol</a>.</li> </ul>
4	The student was remanded to jail or prison.	<ul style="list-style-type: none"> <li>The district may appeal if there is official documentation<sup>6</sup> from the jail or prison that the student earned an on-time regular diploma.</li> <li>The student counts as a dropout if there is no official documentation.</li> </ul>
5	The student withdrew to a home school in another Tennessee district.	<ul style="list-style-type: none"> <li>The district may appeal if it has a copy of the official Intent to Home School form signed by the parent or guardian.</li> </ul>
6	The student withdrew to an adult high school in the same district.	<ul style="list-style-type: none"> <li>The student counts as a dropout unless she/he earns an on-time regular diploma, in which case the district should re-enroll the student in her/his former regular high school and submit corresponding completion data to EIS.</li> </ul>
	The student withdrew to an adult high school in another Tennessee district.	<ul style="list-style-type: none"> <li>The district may appeal if there is official documentation that the student earned an on-time regular diploma.</li> <li>The student counts as a dropout if there is no official documentation.</li> </ul>
	The student was remanded to an alternative school in the same district.	<ul style="list-style-type: none"> <li>The student counts as a dropout unless she/he earns an on-time regular diploma, in which case the district should re-enroll the student in her/his former regular high school and submit corresponding completion data to EIS.</li> </ul>
	The student withdrew to an alternative high school in another Tennessee district.	<ul style="list-style-type: none"> <li>The district may appeal if there is official documentation that the student earned an on-time regular diploma.</li> <li>The student counts as a dropout if there is no official documentation.</li> </ul>
7	The student withdrew to Job Corps.	<ul style="list-style-type: none"> <li>The district may appeal if there is official documentation that the student earned an on-time regular diploma.</li> <li>The student counts as a dropout if there is no official documentation.</li> </ul>
8	The student was enrolled less than 60 days in the most recent year.	<ul style="list-style-type: none"> <li>The district may appeal if the student was enrolled in another district for a greater proportion of days in grades 9–12.</li> </ul>
9	Seniors withdrew during the last week of the Phase I window.	<ul style="list-style-type: none"> <li>The district may submit documentation for students who withdrew during the last week of the Phase I window (between June 27 and July 1). The department will deny requests to review documentation that was</li> </ul>

<sup>6</sup> A copy of one of the following may serve as official documentation: 1) Student's official diploma, 2) Letter on official letterhead from the corresponding school/program/facility reflecting the date the student received a regular education diploma, or 3) Student's official transcript reflecting the date the student received a regular education diploma

	Scenario	Guidance
		submitted for the first time during the appeals window except for documentation for seniors who withdrew during the last week of the Phase I window. This exception is to give districts more time to provide appropriate documentation for students.
10	The student transferred to another district in Tennessee and the receiving district never enrolled the student (and may or may not have requested corresponding student records).	<ul style="list-style-type: none"> <li>The student counts as a dropout.</li> </ul>
11	The student withdrew to a GED program.	<ul style="list-style-type: none"> <li>The student counts as a dropout.</li> </ul>

### 3.2. Non-appealable Cohort Issues

The non-appealable cohort issues are specified below:

- Cohort change requests should have been submitted and completed by the Phase I deadline (July 1). The department will not accept any new requests during the appeals windows.
- The district did not correct inaccurate data elements (e.g., withdrawal code, race/ethnicity, year entered grade 9, economically disadvantaged, disability status, English learner status, etc.) before the Phase I deadline.
- The district did not upload documentation before the specified deadline. The department will deny requests to review documentation that was submitted for the first time during the appeals windows except for the last-minute withdrawal cases that occurred since the last week of the Phase I timeline.
- The district did not enter the required completion data before the deadline. Completion data for fall and spring graduates should have been entered by the Phase I deadline; completion data for summer graduates should have been entered by the Phase II deadline.

## Section 4: Federal Graduation Rate Guidelines

The department calculates four-year adjusted cohort graduation rates based on the requirements of the Every Student Succeeds Act (ESSA). The law in its entirety is available [here](#).<sup>7</sup> Additionally, following the federal reporting guidelines under [20 USC 7801\(A\)\(ii\)\(I\)\(bb\)](#) and state reporting guidelines under [TCA 49-1-601\(b\)](#), starting with the 2021 graduation cohort, students who earn a regular diploma or an alternate academic diploma (AAD) on time are counted in the graduation rate calculation.

### How are four-year adjusted cohort graduation rates calculated?

Graduation rates are calculated using the U.S. Department of Education's four-year adjusted cohort formula listed below.

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

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

### Which students form the cohort?

The cohort of students is the number of students who form the original cohort of entering first-time students in grade 9 enrolled in the high school no later than the date by which student membership data must be collected annually...adjusted by—(I) adding the students who joined that cohort, after the date of the determination of the original cohort; and (II) subtracting only those students who left that cohort, after the date of the determination of the original cohort.

### Which students may be “removed” from a cohort?

To remove a student from a cohort, a school or local education agency shall require documentation, or obtain documentation from the state educational agency, to confirm that the student has transferred out, emigrated to another country, or transferred to a prison or juvenile facility, or is deceased. More information regarding cohort change is available in the [Cohort Change Request Instructions](#).

### What is the definition of a “transfer”?

The term ‘transferred out’ means that a student, as confirmed by the high school or local education agency has transferred to—(I) another school from which the student is expected to receive a regular high school diploma; or (II) another educational program from which the student is expected to receive a regular high school diploma or an alternate diploma.

### Why must districts submit documentation for each withdrawn student?

The confirmation of a student's transfer to another school or educational program requires documentation of such transfer from the receiving school or program in which the student enrolled. A student who was enrolled in a high school, but for whom there is no confirmation of the student having transferred out, shall remain in the adjusted cohort.

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<sup>7</sup> The sections relating to graduation rates can be found on pages 395–397 of the linked document.

<sup>8</sup> Please consult [EIS Appendix J](#) for completion codes and appropriate documentation to support each completion code.

### **Can students who earn GEDs be removed, or can students be moved to later cohorts?**

A student who is retained in grade or who is enrolled in a program leading to a general equivalency diploma, or other alternative educational program that does not issue or provide credit toward the issuance of a regular high school diploma, shall not be considered transferred out and shall remain in the adjusted cohort.

## **4.1 Alternate Academic Diploma**

ESSA allows students who earn alternate academic diplomas and take the alternate assessment to count as graduates. The department has worked with the State Board of Education to develop an alternate diploma that meets the criteria of the law. Beginning with the 2021 graduation cohort, students who earn an alternate academic diploma are included in the graduation rate calculation, and this rule will continue to be implemented moving forward.

Including students with an AAD in the graduation rate calculation has a direct implication on ACT participation rate calculation because the denominator of the ACT participation rate is derived from the numerator of the graduation rate. This rule also has a direct implication on *Ready Graduate* rate calculation because the numerator of the *Ready Graduate* rate is derived from the numerator of the graduation rate.

## Section 5. Cohort Appeals Submission Instructions

This section provides instructions for appeals submissions. Please follow all directions very closely to support the timely and accurate resolution of the appeals in question. Any questions related to the Cohort process shall be directed to [TNEG.Graduates@tn.gov](mailto:TNEG.Graduates@tn.gov).

**Step 1.** Download the [Appeals Submission Worksheet](#) from the Cohort application.

**Step 2.** Fill out the “Contact\_Info” tab.

- a. Enter a valid date in cell B2 (format: MM/DD/YYYY).
- b. Enter your district number in cell B3.
  - This should automatically populate your district name, director’s name, and director’s email address.
  - Contact the department at [TNEG.Graduates@tn.gov](mailto:TNEG.Graduates@tn.gov) if any of the information that automates is incorrect.
- c. Enter the name of the person who serves as the point of contact for graduation cohort data in cell B7.
- d. Enter the email address of the graduation cohort point of contact in cell B8.
- e. Enter the **numbers** only of the phone number for the graduation cohort point of contact in cell B9.
  - The numbers will automatically format.
- f. Enter the appropriate phone extension in cell D9, if applicable.

**Step 3.** Fill out the “District\_Appeals” tab.

- a. Enter the first student’s state ID number into cell A2.
  - If you have correctly completed the “Contact\_Info” tab, your district number and district name will automatically fill in.
- b. Enter the school number for the first student in cell D2.
  - You can find the school number in the Cohort application and downloadable files.
- c. Enter the student’s last name in cell E2.
- d. Select the reason for the appeal from the dropdown menu in cell F2.
- e. Enter an explanation of the appeal in cell G2, highlighting the details of the situation and citing relevant guidance documents as needed.
- f. Repeat steps a–c for any remaining students.

**Step 4.** Save the Appeals Submission Worksheet Excel file.

- a. Save the file using the following naming convention: “###\_Appeals\_Submission\_Worksheet” where “###” is your district number.
- b. Submit only one Appeals Submission Worksheet per district.

**Step 5.** Submit appeals and documentation.

- a. The submission can be submitted for all appealed students as either one attachment or multiple attachments to the appeals email. *The department will **not** review any records or documents that are classified as non-appealable issues as specified in [Section 3.2](#).*
- b. If your district is submitting documentation for specific students, please name each document as follows: “**DistrictNumber\_SchoolNumber\_StateStudentIdNumber**”.

- As an example, district number **001** submitting documentation for school **100** and student **1234567** would name the corresponding document: "**001\_100\_1234567**".
  - If you are unable to locate your district and school number, please consult one of the CSV files previously downloaded from the Cohort application or search the [School Directory webpage](#).
- c. If your district is submitting one file for all students, use the following naming convention: "DistrictNumber\_SchoolNumber\_**AllStudents**".
- d. Submit your district's appeals **from your district's director of schools** to [TNEG.Graduates@tn.gov](mailto:TNEG.Graduates@tn.gov). The Appeals Submission Worksheet and all documentation shall be attached to the same email.