

2023-24 Graduation Cohort Phase I

Frequently Asked Questions

January 2024

This document aims to address common questions that arise during Phase I of the Graduation Cohort Appeals process. For more information on timelines and procedures for submitting appeals, please reference the [2023-24 Graduation Cohort Protocol](#).

Timeline and Process

1. *What are the key submission dates in the 2023-24 Graduation Cohort process?*

The Cohort process involves four phases; the key dates for each phase are summarized below:

- **Phase I tasks must be completed by 9 p.m. CDT on June 7, 2024**, including (1) entering completion information and withdrawal information for both the 2023-24 graduating cohort and the 2023-24 graduating class, (2) submitting Cohort Change requests (consult the [Cohort Change Request Instructions](#) for more detail on tasks and timeline), (3) addressing all other cohort related issues (e.g., duplicate students) using the [Graduation Cohort Change Request form](#); and (4) reviewing the TISA Graduates roster and correcting data in EIS as appropriate. In addition to entering and updating information in EIS, districts shall also provide acceptable documentation by the specified deadline.
- **Phase II tasks must be completed by 9 p.m. CDT on August 2, 2024**, including (1) entering completion information for summer graduates from the 2023-24 graduating cohort and the 2023-24 graduating class; (2) submitting 60-day appeals; (3) submitting appeals for adult high school graduates; (4) submitting system error / department error appeals for Phase I records; (5) reviewing the TISA Graduates Roster and correcting data in EIS as appropriate; and (6) importing the complete student transcript data (extract 80) in EIS for the 2024 graduating cohort (**optional**).
- **Phase III tasks must be completed by 9 p.m. CDT on September 6, 2024**, including (1) submitting appeals for summer graduates (only for appealable situations); (2) submitting appeals for receiving students because of a 60-day appeal approval; (3) submitting cohort appeals for federal graduation rate reporting.
- **Phase IV** is the final stage of the cohort process. Finalized graduation data are updated on the Accountability application on October 11 for district review and are embargoed before being released on [Data Downloads](#) at a later date TBD.

During each phase, there is a district submission timeline, a department review timeline, and a district review and remediation timeline. Please consult Table 2 of the [2023-24 Graduation Cohort Protocol](#) for detailed tasks and timelines within each phase.

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

Yes, districts can submit and update data for not only the current cohort (i.e., 2023-24 graduating cohort) but also future cohorts (i.e., the 2024-25, 2025-26, and 2026-27 graduating cohorts). Because students may move in and out of schools and districts throughout their high school years, **it is an optional task for districts to update data for future cohorts during the current cycle**. However, districts must make sure all information for 2023-24 graduating cohort is complete and accurate by the end of the 2023-24 graduation cohort process as

specified in this document.

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

The federal Every Student Succeeds Act (ESSA) requires states to calculate and report disaggregated subgroup graduation rates. At a minimum, every student must be included in a race/ethnicity subgroup. Where appropriate, students may also be flagged as Economically Disadvantaged (ED), English Learners (EL), Students with Disabilities (SWD), or Career and Technical Education (CTE). For the purposes of graduation rate calculations, students will be included in the ED, EL, or SWD subgroup(s) if the student was included in the subgroup at any time since entering high school. For instance, if a student was receiving special education services for two years in high school but was no longer receiving services at the time of graduation, the student must still be flagged for inclusion in the SWD subgroup of a school's graduating cohort. Districts should verify student subgroup assignment(s) in the cohort CSV download file and correct any inaccurate subgroup information before the end of Phase I.

Reviewing Cohort Information During Phase I

4. How do districts review cohort information?

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

1. Navigate to the [Cohort application](#) or log in through Single Sign On.
2. Select the "User" option under "Logon As..." for the Cohort application.
3. Read the News and Timeline sections on the Instructions page of the Cohort application.
4. Click the checkbox that says, "I agree / I acknowledge that I have read the news."
5. Click the "Show Data" button.
6. Click the "Download CSV File" link.

Districts should filter these files for included students¹ 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.

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

Students who should have been included in a prior year's cohort cannot be removed, per federal guidance. For example, if a student's first year in grade 9 is 2020 but their enrollment is showing in the Year Entered Ninth Grade (YE9) = 2019 cohort, they must be included in the 2019 cohort. Although the student is not in that cohort, the 2019 cohort rates have been calculated and released and removing the student would leave the student without a cohort, tainting the data quality. Federal guidance requires students to be included in their **enrolled** first year grade 9 cohort. This is a district enrollment error and should have been changed the previous

¹ Students are included in the cohort if: 1) they have a value of "Y" in the REVISED_INCLUDED_IN_COHORT column, 2) they have a value of "Y" in the INCLUDED_IN_COHORT column and no value in the REVISED_INCLUDED_IN_COHORT column, or 3) they have a value of "P" in the INCLUDED_IN_COHORT column and no value 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 during phase I.

year. This example also highlights the importance of the cohort data verification process to ensure data quality and accuracy.

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

[Federal law](#) (ESEA section 8101(25)(A)(i); 34 C.F.R. § 200.34(a)(2)) requires that the graduation cohort be constructed based on the year each student **first entered grade 9**. For example, if a student first entered grade 9 in the 2020-21 school year but was retained and repeated grade 9 during the 2021-22 school year, the student must remain in the YE9 (Year Entered Ninth Grade) 2020 cohort, per federal guidelines.

However, if a student entered grade 8 in 2019-20 but was retained and repeated grade 8 during the 2020-21 school year, the student would first enter grade 9 in 2021-22 and expect to graduate in 2024-25. It is important to note that, if, in this situation, his student's EIS enrollment automatically rolled over with the YE9 2020 cohort, his or her district could submit a [Graduation Cohort Change Request form](#) to correct the student's cohort and complete the [Cohort Change Request Worksheet](#) following the [Change Request Instructions](#).

Submitting Completion Information During Phase I

7. How should I update EIS to document early graduates?

For an early graduate to be properly documented in the cohort, districts must accurately report **all three of the following components** in their SIS **by 9 p.m. CDT on June 6 AND** upload acceptable documentation on the Cohort application **by 9 p.m. CDT on June 7**:

1. The withdrawal code for the early graduate should be 12,
2. The listed graduation date should be before spring graduation, and
3. The completion type should represent one of the following regular high school diploma codes:
 - a. 1 - Regular diploma
 - b. 11 - Foreign language waiver
 - c. 12 - Art waiver
 - d. 13 - Foreign language and art waiver

Districts should complete the same process for TISA graduates.

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

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

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

A "P" reflects that a student's inclusion in the cohort is "pending." The code will automatically change to a "Y" to signify that a student **is** included in the cohort, unless required supporting documentation is submitted for pending students **during Phase I** and subsequently approved by the department. If the documentation is submitted during Phase I and approved by the department, the code will change to "N" to signify that the student **is not** included in the cohort. These decisions and changes to the cohort will be updated after Phase I.

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

To be counted as a graduate, students must graduate from a regular high school, not an alternative high school, on time and with a regular diploma. According to T.C.A. § 49-6-3402(b): “All course work completed, and credits earned in the 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.” Three actions are required for this to take effect:

1. The student must be withdrawn from the alternative school on or before the penultimate day of the school year.
2. The student must be enrolled in the regular high school on or before the penultimate day of the school year.
3. The graduation date and completion type must be entered in EIS, and the graduation date must fall within the school’s defined calendar in EIS.

11. Where can districts find their TISA graduate roster?

On June 14, the department will release an initial TISA graduate roster, except summer graduates, on the Accountability application. This initial roster will include all students from the 2023-24 graduating class with sufficient completion date and completion type information to be credited as a TISA graduate submitted to EIS by June 6. The department identifies TISA graduates based on completion data entered in EIS; if a district attaches a completion document to a student’s 2023-2024 enrollment indicating that the student earned a regular or alternate academic diploma, then that student will be credited as a TISA graduate eligible for bonuses under TISA Outcome Goal 1. Districts will verify this roster and update completion data in EIS as appropriate during the Phase I Remediation Window beginning June 17th and ending June 21st. For more information on the difference between the 2023-2024 Graduating Cohort and 2023-2024 Graduating class, consult Section 3 of the [2023-2024 Graduation Cohort Protocol](#).

Submitting Withdrawal Information During Phase I

12. Why are changes our district made in EIS not reflected in the Cohort application?

The department updates the Cohort application data nightly during Phase I. Districts must enter or update withdrawal information in EIS and wait until the correction loads (the next day) in the Cohort application before uploading withdrawal documentation. The last date for districts to enter and update withdrawal and completion data in EIS is by **9 p.m. CDT on June 6, 2024**, and the last date for districts to upload the required withdrawal documentation to the Cohort application is **by 5 p.m. CDT on June 7, 2024**. More details about submitting cohort information and documentation during Phase I can be found in Section 5 of the [2023-24 Graduation Cohort Protocol](#).

Please note that only the EIS changes made during Phase I will automatically be updated in the Cohort application. It is the district’s responsibility to ensure the Cohort application has been updated with all changes reported to EIS before the close of Phase I. Please check regularly to ensure all changes are accurately reflected in the Cohort application.

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

Districts must upload supporting documentation for students withdrawn using codes 2, 5, 6, 8, 10, and 17. Districts can upload required documentation using the **Attach** link feature. For a comprehensive list of

adequate documentation for each applicable withdrawal code, please consult Section 5.3 of the [2023-24 Graduation Cohort Protocol](#).

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

Districts should use withdrawal code 2 for situations where a child is placed in the custody of DCS. If the district provides documentation on the Cohort application that the student has transferred to a DCS-approved school² or a state-approved institution that offers an education program culminating in a regular high school diploma, it can appeal to have the child removed from the graduating cohort. ***If the documentation does not support that the student was receiving educational services while at the DCS or state-approved institution, the request will be denied.***

Withdrawal code 2 is **not** to be used for students placed in jail or prison where no education program culminating in a regular high school diploma is offered. Withdrawal code 11 should be used for students withdrawn under court order or other government placement, such as jail or prison.

For more information about required documentation by withdrawal code, please refer to Section 5.3 of the [2023-24 Graduation Cohort Protocol](#).

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

If a student has a withdrawal code of 3 or 4 and is still appearing in the original district's cohort, either the student

- Didn't complete the enrollment process at the receiving school (no subsequent enrollment in EIS) OR
- transferred to an adult high school or alternative school

If the student does not have any subsequent enrollment in EIS, the original district should reach out to the receiving school to confirm the student attended the school and work with the receiving school to enter enrollment information for that student.

If the original district has documentation that the student earned either a regular high school diploma or an alternate academic diploma at an adult high school or alternative school, they can submit an appeal during the Cohort Phase II window to remove the student from their cohort.

For more information about required documentation by withdrawal code, please refer to Section 5.3 of the [2023-24 Graduation Cohort Protocol](#).

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

Students enrolled in a student exchange program who will not receive a diploma should be withdrawn using code 05 as an out-of-state transfer. For more information about required documentation by withdrawal code, please refer to Section 4.3 of the [2023-24 Graduation Cohort Protocol](#).

17. What action should be taken by a district that finds a student who transferred to homeschool?

For students who have been enrolled in homeschool, districts should enter a withdrawal code of 10; additionally, a parent must sign (either physically or digitally) the official Intent to Homeschool [form](#)³ and the

² Please contact [TN Department of Children's Services](#) for more information about DCS approved schools and institutions.

³ This form may be used for home school students both in Tennessee and other states.

form must be uploaded on the Cohort application. For more information about required documentation by withdrawal code, please refer to Section 5.3 of the [2023-24 Graduation Cohort Protocol](#).

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

No, documentation must prove the student earned a regular high school diploma. Students could participate in a completion ceremony and receive a certificate that is not a regular high school diploma. A transcript or diploma would be approved documentation.

19. *Will the department accept withdrawal documentation signed by the student?*

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

Submitting a Cohort Change Request During Phase I

20. *When can schools and districts submit a cohort change?*

Cohort Change requests can only be submitted and processed during **Phase I** as specified in Table 1 of the [Change Request Instructions](#). Districts should submit a cohort change request for the following issues:

- Incorrect cohort year
- Duplicate student ID
- Student enrolled in an Individualized Education Account (IEA) program
- 9th Grade No-Show/District Enrollment Error
- Service enrollment
- Student missing from the cohort

Any cohort changes submitted after the Phase I deadline will be automatically denied. Districts must submit a [Graduation Cohort Change Request form](#) and attach a [Cohort Change Request Worksheet](#). For more information on submitting Cohort Change Requests and required documentation, please consult Section 5.4 of the [Graduation Cohort Protocol](#).

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

These cases can arise when students transfer between districts or because of atypical enrollment situations. To reconcile these records, please contact the Help Desk at DT.Support@tn.gov. Once the duplicate ID has been merged, districts must submit a [Graduation Cohort Change Request form](#) and attach a [Cohort Change Request Worksheet](#). Specific directions for this process, including submission dates and timelines, are in the [Change Request Instructions](#). The process for merging student IDs is not complete until the cohort change request is submitted and processed by the department.

22. *What should a district do if a "year entered grade 9" is listed incorrectly in the Cohort application?*

USED requires that graduation cohorts are constructed based on the year each student **first entered grade 9**. In the event that the "year entered grade 9" is listed incorrectly, the district must provide a transcript documenting that the actual year the student entered grade 9 was prior to the year reported in the Cohort application. However,

if the student was not properly included in the prior year's graduation rate, the request may be denied. Districts must submit a [Graduation Cohort Change Request form](#) and attach a [Cohort Change Request Worksheet](#). Specific directions for this process, including submission dates and timeline, are in the [Change Request Instructions](#).

23. Can students participating in the Individualized Education Account (IEA) program be removed from a cohort?

Students who are currently enrolled in the IEA program are eligible to be removed from a cohort with a cohort change request and sufficient documentation. Districts must provide a current transcript from the non-public school or program in which the student is primarily enrolled.

24. What action should be taken by a district that finds a student who spent less than 60 days in the school or district in their final year of enrollment?

Students who are enrolled less than 60 days in any school or district in their final year of enrollment are eligible to be removed and returned to the school or district in which they were enrolled for the majority of their high school career. These changes should be submitted during **Phase II only** as an appeal for students in the current graduating cohort. More information about the Phase II appeals process will be released in summer 2024.

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