



Department of
Education

2016 Graduation Cohort Appeals Guidance

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Section 1: Overview

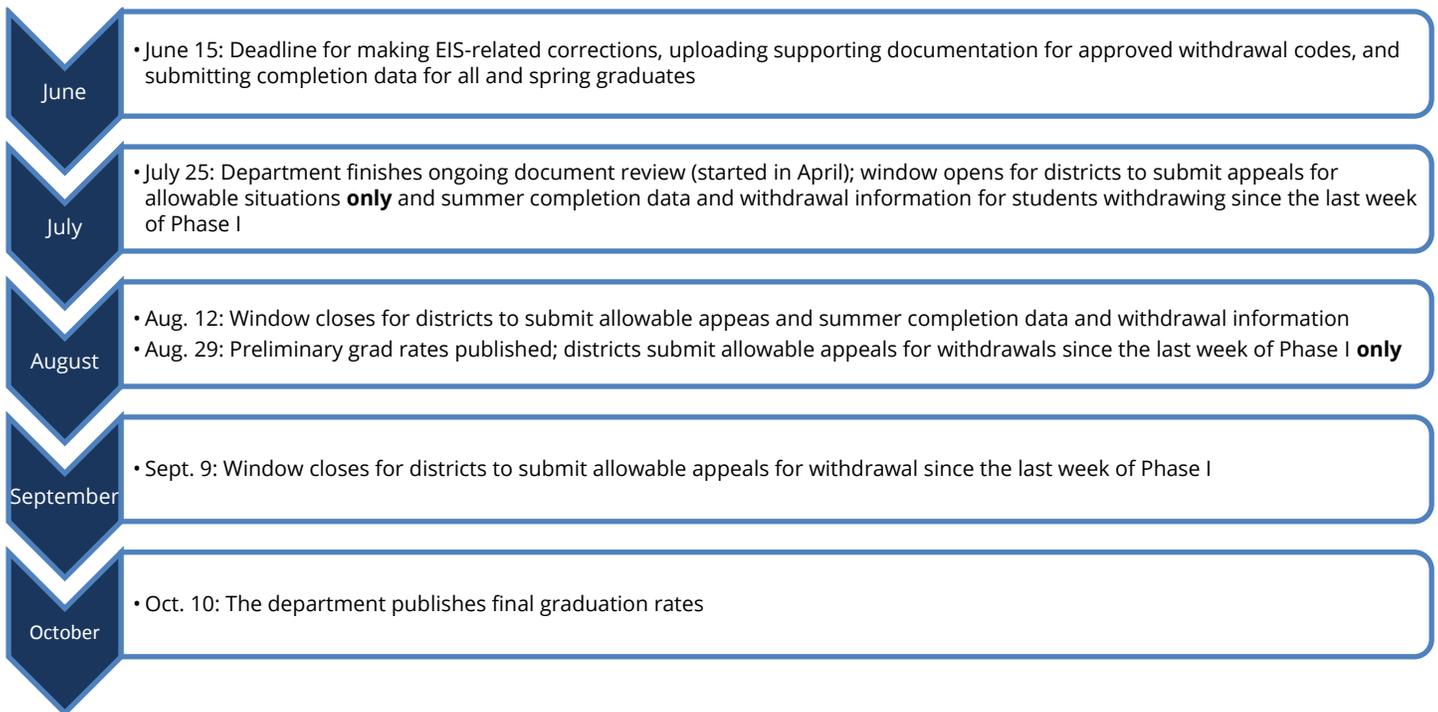
The aim of the present document is to detail the process and situations in which districts may appeal graduation rate calculations. The hope is that by communicating this information ahead of the release of preliminary graduation rates and cohort decisions that districts will be aware and empowered to correct and to verify all cohort-related information, in terms of EIS changes and documentation uploads.

The department is committed to rendering equitable cohort decisions that are in alignment with both federal and state guidelines. Because those decisions have a direct impact on graduation rate calculations, the cohort appeals process is designed to afford districts an opportunity to petition preliminary cohort decisions that exceed the scope of standard cohort-related requirements (e.g., entering completion data, reporting discrepancies in year entered grade 9). Those petitions are intended to resolve extenuating and case-specific circumstances not fully addressed by federal or state guidelines, as well as to offer a reconsideration of previously denied documentation.

Section 2: Cohort Process Timeline

The 2015-16 cohort appeals window will begin on July 25, 2016, and will conclude on August 12, 2016. For students withdrawn since the last week of Phase I, there will be a separate appeals window **for these students only** from August 29, 2016, through September 9, 2016. **Please be advised that district cohort appeals may not be submitted before the official submission periods listed in this document.** Detailed instructions for submitting appeals will be disseminated to districts through the *Commissioner's Update for Directors* in July.

Below is a timeline of important dates to note as it relates to appeals- and cohort-related activities.



Section 3: Cohort Appeals Parameters

3.1 Appealable and Non-Appealable Situations

Listed below are scenarios in which a district may submit an appeal. While the scenarios listed below are comprehensive, they do not and cannot represent all possible circumstances that pertain to the source of all district cohort concerns.

Appealable cohort issues:

- The department did not apply a cohort update requested by the district for which the district has **written confirmation of approval** from the department (e.g., transfer of students to another cohort).
- The district's EIS extract/data migration failed to process **before** the submission deadline.
- A student was remanded to jail or prison, but the district has documentation that the student received an on-time regular education diploma.
- A student transferred to another public district in Tennessee, but there is no subsequent enrollment in EIS. The district determined that the student's parent or guardian notified the receiving district of his or her intent to home school the student. The receiving district provided a copy of the signed Intent to Home School form.
- A student withdrew to an adult high school or alternative located in another district in Tennessee or to Job Corps, but the district in whose cohort the student remains has documentation that the student received an on-time regular education diploma.¹
- For a student withdrawn via code 2, 5, 6, 8, 10, or 17, the department denied documentation that the district uploaded that the district can verify complies with the guidance set forth in the 2016 Withdrawal Code Guidance document published on the Instructions page of the Cohort application.

Non-appealable cohort issues:

- The district did not upload any documentation to the Cohort application before the June 15 deadline for a student who withdrew via code 2, 5, 6, 8, 10, or 17. If the district submits first-time documentation during the appeals window, the documentation will not be reviewed and the appeal automatically denied.
- The district did not enter required completion data for all and spring graduates on or before June 15, 2016 or for summer graduates on or before August 12, 2016.
- The district did not correct inaccurate data elements (e.g., withdrawal code, race/ethnicity, year entered grade 9, economically disadvantaged, etc.) on or before June 15, 2016.

3.2 Common Cohort Scenarios and Department Guidance

The following page provides additional details regarding common scenarios and department guidance for resolving them.

¹ Please note that adult high schools and alternative high schools do not have official cohorts.

Scenario	Guidance
Student withdrew to an adult high school located in the same district (and there may or may not be a subsequent EIS enrollment that states as much)	<ul style="list-style-type: none"> The student counts as a dropout unless s/he earns an on-time regular education 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.
Student transferred to another district in TN and was enrolled in the receiving district's adult high school (and there may or may not be a subsequent EIS enrollment that states as much)	<ul style="list-style-type: none"> The district may appeal the inclusion of the student in its cohort if the district has official documentation* from the receiving district that the student earned an on-time regular education diploma. Without official documentation, the student counts as a dropout.
Student withdrew to Job Corps	<ul style="list-style-type: none"> The district may appeal the inclusion of the student in its cohort if the district has official documentation* from the receiving district that the student earned an on-time regular education diploma. Without official documentation, the student counts as a dropout.
Student withdrew to a GED program	<ul style="list-style-type: none"> The student counts as a dropout.
Student was remanded to an alternative school in the same district	<ul style="list-style-type: none"> The student counts as a dropout unless s/he earns an on-time regular education 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.
Student transferred to another district in TN and was enrolled in the receiving district's alternative high school (and there may or may not be a subsequent EIS enrollment that states as much)	<ul style="list-style-type: none"> The district may appeal the inclusion of the student in its cohort by providing documentation transferred to and enrolled in another district in TN.
Student transferred to another district in TN and the receiving district never enrolled the student (and may or may not have requested corresponding student records)	<ul style="list-style-type: none"> The student counts as a dropout.
Student transferred to another district in TN and the parent/guardian decided to home school the student (and there is no subsequent EIS enrollment)	<ul style="list-style-type: none"> The district may appeal the inclusion of the student in its cohort if it has a copy of the official Intent to Home School form, signed by the parent/guardian, provided by the receiving district.
Student was remanded to jail or prison via court order.	<ul style="list-style-type: none"> The district may appeal the inclusion of the student in its cohort if the district has official documentation* from the jail or prison that the student earned an on-time regular education diploma. Without official documentation, the student counts as a dropout.
A department cohort update was not applied	<ul style="list-style-type: none"> The district may appeal the inclusion of the student in its cohort if the district has documentation (i.e., department email correspondence) that the department committed to applying the update.
Failed EIS extract/data migration	<ul style="list-style-type: none"> The district may appeal the inclusion of the student in its cohort if it has evidence that the data migration/extract failed before the corresponding deadline (either June 15, 2016 or August 12, 2016, depending on whether the graduate was a spring/fall or summer graduate). A screenshot of the extract submission error message, including the date and time stamp, may be used to document the error.
The department denied documentation for students withdrawn via code 2, 5, 6, 8, 10, or 17	<ul style="list-style-type: none"> The district may appeal the inclusion of the student in its cohort only if it has evidence that the documentation submitted is in full compliance with the guidelines set forth in the 2016 Withdrawal Code Guidance document.
<p>*A copy of one of the following may serve as official documentation (continued on following page):</p> <ul style="list-style-type: none"> Student's official diploma Letter on official letterhead from the corresponding school/program/facility reflecting the date the student received a regular education diploma Student's official transcript reflecting the date the student received a regular education diploma 	

Section 4: Federal Graduation Rate Guidelines

Excerpted below are elements of the U.S. Department of Education’s high school graduation rate guidance, which form the basis of state cohort-related policies and procedures. The sections that follow reflect common questions and concerns from districts regarding the inclusion or exclusion of students in the cohort. The document in its entirety is available on the "Instructions" page of the Cohort application.

A-4. Why must States base the four-year graduation rate on “first-time in ninth grade” cohorts?

Cohort-based graduation rates are accurate only if each student is assigned to a single cohort. For example, without a single cohort assignment, a student who repeated ninth grade might be included in two separate cohorts of ninth graders—the class in which the student originally started ninth grade and the class in which the student was assigned for his or her second year of ninth grade. Unless the student skipped a grade later in high school or caught up with the original cohort in some other manner, that student would not graduate within four years of starting ninth grade. Therefore, to ensure an accurate measure of a four-year graduation rate, the cohort must be based only on students who are first-time ninth graders.

A-5. Does the four-year graduation rate include a student who graduates from high school in less than four years?

Yes. The four-year graduation rate counts a student who graduates with a regular high school diploma in four years or less as a high school graduate in his or her original cohort—that is, the cohort with which he or she started ninth grade.

A-19. Which students may be “removed from a cohort”?

Only a student who transfers out and enrolls in another school or in an educational program that culminates in the award of a regular high school diploma, emigrates to another country, or dies may be removed from a high school’s or LEA’s cohort. Before removing a student from a cohort, a school or LEA must obtain confirmation in writing that the student transferred out, emigrated, or is deceased.

A-20. What is the definition of a “transfer”?

A *transfer into* a cohort occurs when a student enrolls after the beginning of the entering cohort’s first year in high school, up to and including in grade 12. A *transfer out* of a cohort occurs when a student leaves a school and enrolls in another school or in an educational program that culminates in the award of a regular high school diploma. A student who is retained in grade, enrolls in a GED program, or leaves school for any other reason may not be counted in the four-year or extended-year graduation rate as a transfer and must remain in the adjust cohort (i.e., must be included in the denominator of the graduation rate for that cohort).

A-21. When a student transfers into a school, to which cohort should a school or LEA assign the student?

A student who transfers into a school should be assigned to the cohort in which the student started ninth grade for the first time.

A-26. Why is written confirmation required before a student may be removed from a cohort?

It is critical for a school or LEA to have written confirmation that a student has transferred, emigrated to another country, or died before a student is removed from a cohort. Written documentation facilitates audits and, thus, will help ensure that states, LEAs, and schools have an accurate measure of graduation rate.

4.1 Potential Changes under the Every Student Succeeds Act (ESSA)

With the passage of ESSA, the department is awaiting guidance from the federal officials regarding any alterations that are permitted or required to the way in which graduation rates are calculated. As more information becomes available, the department will disseminate updates and guidance through the *Commissioner's Update for Directors*.

Section 5: Frequently Asked Questions

Who is granted access to the Cohort application, and where can I access the Cohort application?

Only district-level (central office) employees whose roles include cohort-related responsibilities are eligible for access to the Cohort application. Eligible personnel can access the Cohort application at the following [link](#).

How do I request access or reset my password to the Cohort application?

Users who need to reset their passwords, as well as eligible district-level personnel seeking access, should email TNE.D.Graduates@tn.gov. District-level personnel seeking application access must submit an [EIS Access Application form](#), which includes a justification for accessing the Cohort application and a statement of acknowledgment by the requestor's supervisor.

How is the graduation rate calculated?

The four-year graduation rate is calculated by dividing the number of students who graduate within four years and a summer with a regular education high school diploma by the number of students who form the cohort for that graduating class, which does not include any students who transfer out, emigrate to another country, or pass away).

Under what circumstances may a district submit an appeal?

Please see [section 3](#) for the 2016 appeals parameters.

What is the process for submitting an appeal?

In preparation for the August (fall and spring graduates) and September (summer graduates) 2016 windows for cohort appeals, the department will disseminate detailed appeals submission instructions through a Commissioner's Update for Directors in July. The process will entail the submission of a formal letter of appeal as well as Cohort application-based requirements (e.g., uploading documentation for appealable decisions).

What are the required components of an appeal?

The components of an appeal will be identified in the communication noted above. Basic components will include a letter of appeal on district letterhead signed by the superintendent/director of schools, as well as data including, but not limited to, district number, student state ID number and name, nature of appeal, and relevant rationale. Appeals may be submitted at the district level only.

What is the deadline for submitting an appeal?

August 12, 2016, is the deadline for submitting a district appeal for fall or spring graduates. For summer graduates, September 9, 2016, is the final day that district appeals will be accepted.

If the department denies a district cohort appeal, may the district appeal the denial?

No. The department's decisions on appeals will be considered final; no further reviews will be permitted.

To whom should districts address any questions or concerns relating to graduation rates or the Cohort application?

Districts should submit all cohort-related inquiries to TNE.D.Graduates@tn.gov.