

# 2023-24 Graduation Cohort: Phases II & III Appeals Guide

Date: June 2024

## Key Updates:

- **New in 2023-2024:** During Phases I and II of the 2023-2024 Graduation Cohort Process, districts will also verify the TISA graduate roster for the 2023-24 school year, which includes students eligible for TISA High School Outcome Bonuses. For more information on the difference between the Graduation Cohort and the TISA Graduating Class, please consult [Section 3](#).
- **New in 2023-2024:** During Phase II of the 2023-2024 Graduation Cohort Process, districts will submit a district substitution policy listing all postsecondary credits that the district allows for graduation requirement substitutions. Districts will also complete a worksheet containing all postsecondary course codes eligible for substitution of Algebra II/Integrated Math III and Chemistry/Physics. The department will use these documents along with transcript data to identify students for exclusion from the federal graduation rate. Instructions for completing these tasks are available in [Section 6.1](#). For more information about the difference between the Tennessee Graduation Rate and the Federal Graduation Rate, please consult [Section 2](#). For more information on acceptable substitution policies, please consult [District Post-Secondary Substitution Policy Requirements](#).

Please reach out to [TNEd.Graduates@tn.gov](mailto:TNEd.Graduates@tn.gov) for all questions related to the Cohort process.

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## Section 1: Cohort Phase II-III Overview

The Graduation Cohort Process includes three distinct phases:

- **Phase I: February 5, 2024 – June 28, 2024 (June 7 District Initial Submission Deadline)**  
By the end of Phase I, districts have updated withdrawal and completion information in EIS and uploaded the required documentation for the corresponding withdrawal and completion codes. All issues regarding Phase I tasks, including (1) submitting completion and withdrawal information in EIS, (2) submitting cohort change requests, and (3) addressing other cohort-related issues, should have been addressed by the end of the Phase I remediation window; The data updated during Phase I was finalized at the end of the Phase I process.
- **Phase II: July 8, 2024 – August 16, 2024 (August 2 District Initial Submission Deadline)**  
Districts have five major tasks: (1) report summer graduates in EIS; (2) import the complete student transcript data (extract 80) in EIS for the 2024 graduating cohort (*optional*); (3) submit 60-day appeals; (4) verify the TISA graduate roster (*new*); and (5) submit a postsecondary credit substitution worksheet and district substitution policy (*new*). All issues regarding these five tasks should be addressed by the end of the Phase II remediation window, as the data updated during Phase II will be finalized by the end of the Phase II process.
- **Phase III: August 26, 2024 – October 4, 2024 (September 6 District Initial Submission Deadline)**  
Districts have three major tasks: (1) submit appeals for summer graduates (only for appealable situations); (2) submit appeals for receiving students because of a 60-day appeal approval; (3) submit appeals for federal graduation rate reporting. All issues regarding these three tasks should be addressed by the end of the Phase III remediation window, as the data updated in Phase III will be finalized by the end of the Phase III process. In this phase, districts can also review their preliminary graduation rate in the Cohort application. However, this data will not reflect possible changes resulting from Phase III appeals.

This document helps districts navigate Phases II and III of the 2023-24 Graduation Cohort Process. It outlines the Cohort Phase II and III timeline, the major tasks for districts during each phase, appeals parameters, and the process for submitting appeals.

These two phases allow districts to complete the submission of information for summer graduates and submit appeals as needed, and resolve any issues related to the graduation data in accordance with state and federal guidelines. Districts should focus on the appealable issues specified in [Section 5.1](#). Appealable issues specific to the federal graduation rate calculation are discussed in detail in [Section 5.1.7](#). Non-appealable issues listed in [Section 5.2](#) should have been addressed during Phase I; therefore, they are not appealable during Phase II and Phase III. Information regarding Phase I tasks is available in the [2023-24 Graduation Cohort Protocol](#).

It is crucial for districts to be actively engaged in the cohort process, as the graduating cohort data will be utilized for evaluating the Graduation Rate and *Ready Graduate* indicators, as well as for calculating the ACT/SAT participation rate. Furthermore, the roster of students eligible for TISA High School Outcome Bonuses will be used in the awarding of TISA bonuses. Once the data are finalized by the end of the cohort process, data related to the graduating cohort and the TISA roster are final and can no longer be appealed. For more information on the



difference between the Graduation Cohort and the roster of students eligible for TISA High School Outcomes bonuses, please consult [Section 3](#). Any questions about the 2023-24 Graduation Cohort process can be sent to [TNEducation@tn.gov](mailto:TNEducation@tn.gov).

## Section 2: Graduation Rate Guidelines

Federal law<sup>1</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 who earn a regular diploma or an alternate academic diploma, including completion types 1, 8, 11, 12, or 13, 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 2021 would be placed into the 2020 cohort and expected to graduate in spring 2024. Applying these definitions to the 2024 graduating cohort, the cohort includes students who entered grade 9 during the 2020-21 enrollment period. Graduates are students who completed high school with completion types 1, 8, 11, 12, or 13 by the end of summer 2024.

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 9th grade and earn either a regular diploma with **all required coursework in all subject areas** or an alternate academic diploma (AAD). This means that students who receive a regular 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>2</sup>. The distinction between the two is discussed below.

### 2.1. Federal Graduation Rate

When calculating the federal graduation rate, only students who complete **all required coursework in all subject areas** per the requirements of ESSA § 8101(25) and ESSA § 8101(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 regular diploma without completing Algebra II (or Integrated Math III) and Chemistry or Physics (courses normally required for all graduates). Per federal guidelines, students taking the alternative pathway cannot be counted as graduates in the federal graduation rate calculation.

<sup>1</sup> [ESEA section 8101\(25\)\(A\)\(i\); 34 C.F.R. § 200.34\(a\)\(2\)](#)

<sup>2</sup> Also see CHAPTER 0520-01-03-.06

This federal requirement regarding graduation rate calculations only affects calculations for federal reporting; it does not supersede the SBE's [High School Policy 2.103](#), which governs the awarding of regular 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 regular 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. 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 years of English language arts (ELA) and math in extended courses (A/B courses) and those who received three credits of science in accordance with the [High School Policy 2.103](#) will continue to receive a regular 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 *Ready Graduate* rate<sup>3</sup> and the ACT/SAT participation rate<sup>4</sup> for federal accountability purposes.

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<sup>3</sup> The *Ready Graduate* rate is the number of graduates with *Ready Graduate* status divided by the number of students in the graduating cohort.

<sup>4</sup> ACT participation rate equals the number of graduates with a **regular diploma** and a valid ACT/SAT score divided by the number of graduates with a regular diploma.

## Section 3: TISA Graduates Roster

Starting with the 2023-24 Graduation Cohort Process, districts will not only verify the roster of students included in the 2023-24 Graduation Cohort but will also verify the roster of TISA graduates (i.e., students eligible for 2024 TISA High School Outcome Goal 1 Bonuses). The roster of TISA graduates includes all students in the 2023-24 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 who entered ninth grade four years prior to the year in question regardless of completion status, whereas a graduating class includes only students who received a regular or alternate academic diploma (AAD) in that year, regardless of their first year entering 9th grade. For a detailed overview of the differences between the 2023-24 Graduation Cohort and the 2023-24 Graduating Class, please consult Table 1 below.

**Table 1. Graduating Cohort vs. Graduating Class**

Graduating Cohort (2023-2024)	Graduating Class (2023-2024)
<ul style="list-style-type: none"> <li>• Used in federal and state accountability</li> <li>• Includes all students that entered 9th grade in 2020-21, regardless of completion status by the summer of 2023-24</li> <li>• Includes students who entered grade 9 in 2020-21 and graduated early (i.e., prior to 2023-24)</li> <li>• Only students with “P” in the enrollment status are included</li> <li>• Students enrolled at CTE schools, adult high schools, or closed schools may be included in the cohort depending on their prior enrollment</li> </ul>	<ul style="list-style-type: none"> <li>• Used for calculating TISA outcomes</li> <li>• Includes all students who received a regular diploma or an alternate academic diploma (AAD) during the 2023-24 school year (including summer) regardless of their first year entering 9th grade or number of years taken to complete high school</li> <li>• Includes some students who entered grade 9 before 2020-21 and graduated late or who entered grade 9 after 2020-21 and graduated early (in both cases, the student must graduate in 2023-24)</li> <li>• Students who graduate from a CTE or 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 EIS. To count as a TISA graduate, a student must have a completion document with a completion type of 1 (Regular Diploma), 8 (Alternate Academic Diploma), 11 (Regular Diploma with Foreign Language Waiver), 12 (Regular Diploma with Fine Arts Waiver), or 13 (Regular Diploma with Foreign Language and Fine Arts Waiver) attached to his or her enrollment for the 2023-24 school year. Students with other completion types or with completion documents attached to another enrollment year will not be counted as TISA graduates. Districts shall ensure student completion date and completion type information for all students who graduated during the 2023-24 school year is entered correctly in EIS during Cohort Phase I (Fall and Spring Graduates) and Cohort Phase II (Summer Graduates). By the end of Phase II, the TISA graduate roster is final and cannot be appealed during the College and Career Readiness (CCR) data verification process. See Table 2 in [Section 4](#) for required tasks in Phase I and Phase II related to finalizing the TISA graduate roster.



## Section 4: Cohort Phase II-III Tasks and Timelines

[Table 2](#) summarizes the key tasks and timelines for districts in Phase II and Phase III. There are four windows within each phase. It is essential that districts complete the required tasks following the specified timeline.

**Table 2. Cohort Phase II-III Tasks Timelines**

Cohort Phase II (July 8 - August 16, 2024)		
Date	Milestone	Tasks
<b>July 8 - August 2, 2024</b>	<b>Submission window:</b> Phase II tasks complete	<p>During this window, districts should complete the following tasks by <b>August 2:</b></p> <ul style="list-style-type: none"> <li>Report summer graduates for the 2023-24 graduating cohort and 2023-24 graduating class in EIS (<b>new</b>)</li> <li>Import the complete student transcript data (extract 80) in EIS for the 2023 graduating cohort (<b>optional</b>)</li> <li>Submit appeals for appealable situations (see <a href="#">Section 5.1</a>), including: <ul style="list-style-type: none"> <li>Department/system errors</li> <li>60-day appeals</li> <li>Adult high school diploma completion</li> </ul> </li> </ul> <p>During this window, districts should begin the following task:</p> <ul style="list-style-type: none"> <li>Submit district substitution policy and postsecondary credit substitution worksheet (one per district) (<b>new</b>) – must be completed by <b>August 14</b></li> </ul>
<b>August 5-9, 2024</b>	<b>Initial response window:</b> Initial response letter sent	<p>The department will review all appeals documentation submitted by August 2 during this window and approve or deny the submitted documentation. All appeals decisions will be reflected in the Cohort application by <b>August 9</b>. Districts are encouraged to check the Cohort application for:</p> <ul style="list-style-type: none"> <li>Summer graduate information</li> <li>Reassignments resulting from 60-day appeals</li> </ul> <p>Additionally, the director of schools will receive an initial response letter by August 9 for any Phase II appeals submitted by August 2. The initial response letter will be uploaded on the Accountability application.</p>
<b>August 12-14, 2024</b>	<b>Remediation window:</b> Resubmission complete	<p>During this window, districts shall complete the following tasks by <b>August 14:</b></p> <ul style="list-style-type: none"> <li>Resubmit appeals to correct denials if additional appropriate documentation is available.</li> <li>The department will release an updated TISA graduate roster including summer graduates on the Accountability application on August 9th. Districts shall review the roster and update completion information in EIS as appropriate. This is the final chance for districts to correct any information regarding TISA graduates in EIS. (<b>new</b>)</li> <li>Submit district substitution policy and postsecondary credit substitution worksheet (one per district) (<b>new</b>)</li> </ul>
<b>August 16, 2024</b>	<b>Final Response window:</b> Final response letter sent	<p>The director of schools will receive a final response letter for the resubmitted appeals by August 16, and the finalized TISA graduate roster will be released on the Accountability application; All decisions for Phase II tasks will be final.</p>

Cohort Phase III (August 26 - October 4, 2024)		
Date	Milestone	District Tasks to be Completed
August 26 - September 6, 2024	<b>Submission window:</b> Phase III tasks complete	During this window, districts shall complete the following tasks by <b>September 6:</b> <ul style="list-style-type: none"> <li>Submit appeals for appealable situations (see <a href="#">Section 5.1</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 6 will be denied.
September 9-20, 2024	<b>Initial response window:</b> Initial response letter sent	The department will review all documentation submitted by September 6 during this window and approve or deny the submitted documentation. <ul style="list-style-type: none"> <li>The director of schools will receive an initial response letter by September 20.</li> <li>The initial response letter will be uploaded on the Accountability application.</li> </ul>
September 23-27, 2024	<b>Remediation window:</b> Resubmission complete	During this window, districts shall complete the following tasks by <b>September 27:</b> <ul style="list-style-type: none"> <li>Resubmit appeals to correct denials if additional appropriate documentation is available.</li> </ul>
September 30-October 4, 2024	<b>Final Response window:</b> Final response letter sent	The director of Schools will receive a final response letter for the resubmitted appeals by October 4; all decisions for Phase III tasks will be final; All data on the Cohort application are final.

## 4.1 Phase II Tasks and Timeline

### 4.1.1 Submission Window

There are three major tasks for districts to complete during the Phase II submission window.

- Report Summer Graduates.** The first task is to report summer graduates in EIS. Summer graduates must have a completion date after the Phase I deadline (June 7, 2024) and a completion code of SU.
  - Failure to enter the correct completion date and code will cause an error in EIS that will prevent the data from loading correctly into the Cohort application. Completion documents may have any date prior to the Attendance Start date of the following school year. However, the End of Service Action date must be before the Attendance End date of the school year in which the student is graduating.
  - Summer graduates should not have a new enrollment for summer school. This will create an error and not allow for the student to be pulled from EIS into Cohort when it is manually updated.
- Import student transcript data in EIS (optional).** In Phase II, districts may import the **complete student transcript data** for the 2024 graduating cohort in EIS. This is an optional but highly recommended task for districts, as it will help districts avoid having to submit appeals during Phase III. The department will use the course enrollment data and student transcript data, when available, to identify students who did not meet the federal graduation definition (i.e., exclusion list). Extract 80 is the data file that districts shall use to import the transcript data in EIS. Districts shall reach out to their EIS Supervisor or [DT.Support@tn.gov](mailto:DT.Support@tn.gov) for more guidance on importing student transcript data in EIS, as needed.
- Submit Cohort Appeals.** In Phase II, districts shall submit appeals for four appealable scenarios, including

(1) department error, (2) system error, (3) 60-day appeals, and (4) adult high school graduates (see [Section 5.1](#) for more information on appealable issues).

- **Submit District Substitution Policy and Substitution Worksheet (new).** To reduce the amount of appeals documentation districts have to submit during Phase III, and to make the initial Federal Graduation Rate Exclusion released at the beginning of Phase III as accurate as possible, districts should submit their substitution policy and a list of substitutable courses (entered in a single substitution worksheet for each district) during Phase II. The department will review these documents and use them to ensure students utilizing postsecondary substitutions for graduation requirements in mathematics and science are properly credited as federal graduates. For more information on an acceptable substitution policy, see [District Post-Secondary Substitution Policy Requirements](#). For more information on how to submit the substitution policy and substitution worksheet, see [Section 6.1](#)).

All required tasks must be completed within the submission window **by 9 p.m. CT on August 2, 2024**. The department will not review any new submissions or appeals submitted outside of this window.

#### 4.1.2 Initial Response Window

The department will provide an initial response to all documentation appeals submitted by August 2. The response letter will be sent to the directors of schools and uploaded to the Accountability Application **by August 9, 2024**. The department will upload an updated TISA Roster to the Accountability Application that reflects completion data submitted for summer graduates.

#### 4.1.3 Remediation Window

There are two major tasks for districts to complete during the remediation window.

- **Respond to Denied Appeals.** This window allows districts to review the records that were denied by the department as specified in the Phase II initial response letter. Districts should only resubmit an appeal when additional documentation is available to support the case. Districts must resubmit appropriate documentation to support denied appeals **by 9 p.m. CT on August 9, 2024**.
- **Review Updated TISA Graduate Roster (new).** Based on data entered in EIS by August 2, the department will update the TISA graduate roster to include summer graduates and release the updated file on the Accountability application by August 9. Districts shall review the updated roster to ensure summer graduates are accurately reflected in the TISA Graduates data file. If students are not accurately reflected in the data file, districts should correct completion data in EIS as appropriate. Any incorrect information in EIS must be addressed **by August 14**. The department will make a final roster update by August 16 and release the data on the Accountability Application. After Phase II, the TISA Graduate Roster is final and can no longer be appealed.

#### 4.1.4 Final Response Window

The department will provide a final response letter to the resubmitted appeals. The response letter will be sent to the director of schools and uploaded to the Accountability Application **by August 16, 2024**. All decisions made in the response letter are final. Additionally, the department will upload an updated TISA Roster to the Accountability Application that reflects completion data submitted for summer graduates; At the end of Phase II, the TISA Roster is

final and can no longer be appealed.

## 4.2 Phase III Tasks and Timeline

### 4.2.1 Submission Window

There are two major tasks for districts to complete during the Phase III submission window:

- **Submit Cohort Appeals.** There are three types of appeals that districts should address during the submission window, including (1) department error, (2) system error, and (3) students received because of a 60-day appeal approval (see [Section 5.1](#) for more information regarding appealable issues).
- **Submit Federal Graduation Rate Appeals.** Students with a regular diploma must *also complete all required coursework in all subject areas* to be counted as graduates in the federal graduation rate calculation (see [Section 2.1](#) for more information). Using enrollment and student transcript data from EIS, as well as district substitution worksheets submitted in Phase II, the department will identify an *exclusion list* comprised of students in the graduation cohort who earned a regular diploma but must be removed from the numerator of the federal graduation rate calculation per federal guidelines. The exclusion list will include any students who received a regular diploma but did not receive a credit in Algebra II/Integrated Math III and/or Chemistry or Physics. During Phase III, districts will submit appeals for any students on the exclusion list who completed these graduation courses or a post-secondary substitution (see [Section 5.1.7](#) for more information).

All appeals must be completed within the submission window **by 9 p.m. CT on September 6, 2024**. The department will not review any new appeals submitted outside of this window.

### 4.2.2 Initial Response Window

The department will provide an initial response to all appeals submitted during the Phase III submission window. The response letter will be sent to the directors of schools and uploaded to the Accountability Application **by September 20, 2024**.

### 4.2.3 Remediation Window

This window allows districts to review the records that were denied by the department during the Phase III initial window as specified in the initial response letter. Districts should only resubmit an appeal when additional documentation is available to support the case. Districts must resubmit appropriate documentation to support denied appeals **by 9 p.m. CT on September 27, 2024**.

### 4.2.4 Final Response Window

The department will provide a final response letter to the resubmitted appeals. The response letter will be sent to the director of schools and uploaded to the Accountability Application **by October 4, 2024**. All decisions are final.

## Section 5: Appeal Parameters and Documentation

This section describes appealable and non-appealable situations during Phases II and III, and the required documentation to support the appeals.

### 5.1 Appealable issues

#### 5.1.1 Department Error

Districts can submit appeals for data in cases where the department failed to apply a decision that it approved during a previous phase. For instance, if the department approved a student's withdrawal from the graduation cohort during Phase I, but the student is still showing as `included_in_cohort`, during Phase II, the district may submit a department error appeal. To support the appeal, districts must provide **written confirmation** that the department committed to updating the Cohort application but did not do so (e.g., moving students from the current cohort to next year's cohort; approved appeals shown in the initial or final response letters). **Note:** Districts can submit department error appeals in Phase II and Phase III.

#### 5.1.2 System Error

Districts can submit appeals when the district's EIS extracts failed to process **before** the deadline. A screenshot of the extract submission error message, including the date and time stamp, may be used to document the error. Districts should email [DT.Support@tn.gov](mailto:DT.Support@tn.gov) to resolve the issue and notify the department at [TNEG.Graduates@tn.gov](mailto:TNEG.Graduates@tn.gov) immediately when a failure to the process occurs. **Note:** Districts can submit system error appeals in Phase II and Phase III.

#### 5.1.3 60-Day Appeal (Phase II Only)

In general, students count in the graduation cohort of the district and school in which they were most recently enrolled. However, [TCA §49-1-601\(a\)](#) allows students who did not attend the same high school for at least 60 days of the most recent school year in which the student was enrolled in Tennessee public schools to be assigned to the school in which the student was enrolled for the greatest proportion of days across grades 9-12. If a student was enrolled in their most recent school for less than 60 days in the most recent school year of enrollment, the district can submit an appeal to have the student reassigned to the school and district in which they spent the majority of their time in high school.

Districts can submit a 60-day appeal with documentation (e.g., an enrollment record) demonstrating that a student was enrolled for less than 60 instructional days of the most recent school year. The student will then be reassigned to the high school at which the student was enrolled for the greatest proportion of school days in grades 9-12. The department will send notifications to any districts affected by such changes. **Note:** 60-day appeals must be submitted during Phase II.

#### 5.1.4 Student Completed Diploma Program at Adult High School (Phase II Only)

If the district has students included in the cohort who withdrew to an adult high school and then later completed a regular diploma, the district can submit an appeal during the Phase II submission window to remove the student from the cohort. The district must provide documentation confirming the student earned a regular or alternate academic diploma on time (i.e. diploma or official transcript).

### 5.1.5 District Substitution Policy and Worksheet (Phase II Only)

Students with a regular diploma must also **complete all required coursework in all subject areas** to be counted as graduates in the federal graduation rate calculation (see [Section 2.1](#) for more information). Using enrollment and student transcript data from EIS, the department will identify an **exclusion list** comprised of students in the graduation cohort who earned a regular diploma but must be removed from the numerator of the federal graduation rate calculation per federal guidelines. The exclusion list will include any students who received a regular diploma but did not receive a credit in Algebra II/Integrated Math III and/or Chemistry or Physics.

[SBE Rule 0520-01-03-.03\(7\)](#) and [SBE Graduation Substitutions Policy 3.103 \(I\)](#) allow districts to substitute post-secondary credits for graduation requirements (like Algebra II/Integrated Math III, Chemistry, and Physics) at district discretion. Districts may make substitutions when a student completes a college-level course in a relevant subject area that meets or exceeds the standards covered by the graduation requirement. In Phase II, districts will submit a copy of their post-secondary substitution policy and add courses listed as substitutable for Algebra II, Integrated Math III, Chemistry, and Physics to the district's substitution worksheet; the department will use these submissions to inform the construction of the exclusion list. See [District Post-Secondary Substitution Policy Requirements](#) for more information on acceptable post-secondary substitution policies and [Section 6.1](#) for more information on how to submit the substitution policy and substitution worksheet.

#### *District Post-Secondary Substitution Policy Requirements*

An appropriate district substitution policy should follow the guidelines of the State Board of Education.<sup>5</sup> It should, at a minimum, include a comprehensive list of all college-level courses eligible for substitution with clear guidelines regarding which college-level courses can be used as course substitutions for SBE graduation requirements. The substitutable course list included in the district substitution policy should contain (1) subject area, (2) type of college-level course (e.g., International Baccalaureate program, Cambridge program, advanced placement, dual enrollment, local dual credit, state dual credit, etc.), (3) course name, and (4) course code. The course name and course code on the substitution list should be the same as the information presented in the EIS or SIS transcript. College-level courses should only be used as substitutions if they are in the same subject area as the graduation course and exceed its standards. For instance, AP Chemistry would be an acceptable college-level substitution for Chemistry, because it is a postsecondary credit in a relevant subject area that includes and exceeds the standards of the graduation course.

**Note:** If a district's substitution policy has not changed since the 2022-23 Graduation Cohort Appeals Process, it may resubmit that substitution policy as-is, provided it was accepted in a previous cycle.

### 5.1.6 60-day Appeal for Students Received (Phase III Only)

Following an approved 60-day appeal, the department will send a letter to schools and districts whose cohort data are impacted by the 60 Day Appeals process on or before August 9 (or August 16 for 60-day appeals that are approved during the Phase II remediation window). Districts can submit an appeal for students they received because of another district's 60-day appeal. If a school receives a student back into their 2024 graduation cohort,

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<sup>5</sup>See [SBE rule 0520-01-03-.03\(7\)](#) and [SBE Graduation Substitutions Policy 3.103 \(I\)](#).

and they have sufficient documentation that the student withdrew from Tennessee public schools<sup>6</sup>, they can submit an appeal for review. The appeal must be supported by appropriate documentation (e.g., enrollment record or withdrawal documentation). This type of appeal can only be submitted during Phase III.

### 5.1.7 Federal Graduation Rate Data Appeal (Phase III Only)

Students with a regular diploma must **complete all required coursework in all subject areas** to be counted as graduates in the federal graduation rate calculation (see [Section 2.1](#) for more information). Using enrollment and student transcript data from EIS, as well as the district's post-secondary substitution policy and substitution worksheet submitted during Phase II (see [Section 5.1.5](#)), the department will identify an **exclusion list** comprised of students in the graduation cohort who earned a regular diploma but must be removed from the numerator of the federal graduation rate calculation per federal guidelines. The exclusion list will include any students who received a regular diploma but did not receive a credit in Algebra II/Integrated Math III and/or Chemistry or Physics.

At the start of Phase III, districts will be able to download the exclusion list from the Accountability application. Districts should carefully review the exclusion list and submit appeals, as needed, to finalize the list for the federal graduation rate calculation. Districts can only submit appeals to remove students from the exclusion list who have proper documentation (i.e., student transcript) of receiving credit(s) for the required course(s) or for an acceptable postsecondary substitution.

#### *Requirements for Federal Graduation Rate Appeals (Phase III)*

When submitting an appeal, districts must provide an official student transcript for each appeal case. The transcript must show the following information:

- District name
- School name
- Student ID
- Student name
- Appealed course or substituted course
- Appealed course code or substituted course code

The department will only accept official transcripts from the current district or the out-of-state sending district as the required supporting documentation. **Students who enrolled but did not receive full credit for a course are not eligible for appeals.** In cases where the student is using a college-level course as an approved substitution for a graduation requirement, the course name and course code presented in the EIS or SIS transcript should be the same as the course name and course codes included on district's substitution list submitted during Phase II (see [Section 5.1.5](#)). Any appeals without an official transcript will be denied automatically.

## 5.2. Non-appealable Cohort Issues

Non-appealable Cohort issues include those specified below:

- Cohort Change Requests (to change a student's cohort year and/or delete no-show enrollments) should have

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<sup>6</sup>See Section 5.3 of the [2023-2024 Graduation Cohort Protocol](#) for more information on appropriate withdrawal documentation.

been submitted and completed by the Phase I deadline (June 7, 2024). The department will not accept any new cohort change requests during the Phase II or Phase III appeals windows.

- The district did not correct inaccurate data elements (e.g., withdrawal code, race/ethnicity, year entered grade 9, economically disadvantaged status, 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 submitted for the first time during the appeals windows.
- The district did not enter the required completion data in EIS 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 6. Cohort Appeals Submission Process

This section describes the submission process for each phase.

### 6.1. Phase II Submission Process

During the Phase II submission window, all appeals and required documentation must be submitted before the deadlines outlined in [Table 2](#). Districts must complete the following steps for their Phase II appeals to be reviewed:

- Complete the [Cohort Phase II Appeals Submission Worksheet](#)
  - Complete all required tabs of the worksheet, including:
    - Contact Info
    - District Appeals
    - District Substitution Courses
  - See [Section 6.1.1](#) for how to complete the worksheet.
  - Save the worksheet as an Excel file with the naming convention “###\_Appeals\_Submission\_Worksheet” where ### is the district number.
- Compile supporting documentation for all appealed records.
  - Consult [Section 5.1](#) for appropriate supporting documentation for the appealable situations.
  - Compile supporting documentation into a single PDF file ordered by student State ID Number.
  - Save supporting documentation as a single PDF file with the naming convention “###\_SupportingDocumentation” where ### is the district number.
  - Any appeals without supporting documentation for the appealed students will be denied automatically.
- Compile the district’s course substitution policy.
  - An appropriate district substitution policy should, at a minimum, include a comprehensive list of all college-level courses eligible for substitution that provides a clear guideline for schools regarding which college-level courses can be used for course substitutions in all subject areas that are SBE graduation requirements. See [District Post-Secondary Substitution Policy Requirements](#) for more information.
  - Save substitution policy as a single PDF file with the naming convention “###\_SubstitutionPolicy” where ### is the district number.
- Submit the worksheet and the supporting documents using the [2023-24 Graduation Cohort Phase II Appeals Form](#).

During the remediation window, the district shall review the initial appeals response letter and resubmit the worksheet and the supporting documents, as appropriate, for denied appeals using the [2023-24 Graduation Cohort Phase II Appeals Form](#). Repeat the same process as described above **ONLY** for the records that have appropriate documentation to support the denied appeals. Districts do not need to resubmit the course substitution policy during the remediation window if it was already submitted prior to the remediation window. The Phase II submission process is discussed in detail in the following sections.

#### 6.1.1. Phase II Worksheet

Please follow all directions listed below very closely to support the timely and accurate resolution of the appeals in question. Any questions related to the Cohort process should be directed to [TNEd.Graduates@tn.gov](mailto:TNEd.Graduates@tn.gov).

**Step 1.** Download the [Cohort Phase II Appeals Submission Worksheet](#) from the Cohort application or TDOE website.

**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 [TNEducation@tn.gov](mailto:TNEducation@tn.gov) if any of the information that auto-populates 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 phone number for the graduation cohort point of contact in cell B9.
  - Enter the phone numbers without symbols; 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’s number and 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.** Fill out the “District\_Substitution\_Courses” tab.

- a. Enter the state course code for the first substitution course in cell A2.
  - The state course name should auto-populate in cell B2 – make sure that it is the expected course name before continuing to step c.
- b. Indicate whether the post-secondary course is substitutable for Algebra II/Integrated Math III or Chemistry/Physics in cell C2.
- c. Check to make sure the post-secondary course is included in the attached substitution policy. If so, select “yes” for “Included in Substitution Policy” in cell D2.

**Note:** Courses not clearly listed as approved substitutions in the attached district substitution policy will not be accepted.
- d. Check to make sure this substitution is consistent with SBE Policy 3.103. If so, select “yes” for “Consistent with SBE Policy 3.103” in Cell E2.
- e. Repeat steps a–d for all post-secondary substitutions for Algebra II/Integrated Math III or Chemistry/Physics on the district’s substitution list.

**Note:** Districts do not need to include post-secondary substitution courses for other graduation requirements (i.e., substitutions for requirements besides Algebra II/Integrated Math III and Chemistry/Physics) in the Phase II Appeals Worksheet.

**Step 5.** 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.

### 6.1.2. Phase II Submission Form

All Phase II appeals must be submitted using the [2023-24 Graduation Cohort Phase II Appeals Form](#) before the deadlines outlined in [Table 2](#). The person submitting the appeals form must have an Orion/SSO account to submit the form. Districts will need to provide the following information when submitting the form:

- District Number
- District Name
- Name and Email of person submitting form
- Director of Schools Name
- Director of Schools Email
- [Cohort Phase II Appeals Submission Worksheet](#)
  - The worksheet must be submitted as an Excel file with the naming convention “###\_Appeals\_Submission\_Worksheet” where ### is the district number.
- Supporting Documentation
  - Documentation must be submitted as a single pdf file ordered by student State ID with the naming convention “###\_SupportingDocumentation” where ### is the district number.
  - **Important Note.** Documentation must be provided for each student being appealed. Failure to include supporting documentation will result in a denial.
- Post-Secondary Substitution Policy
  - Save district post-secondary substitution policy as a single PDF file with the naming convention “###\_SubstitutionPolicy” where ### is the district number.

Districts must submit all appeals with all required documentation before the deadlines outlined in [Table 2](#). Any appeals and documentation submitted past the timeline will be denied. If you need assistance submitting the [form](#), please consult the Microsoft Form Login and Troubleshooting Guide (see [Appendix](#)) or email [TNEG.Graduates@tn.gov](mailto:TNEG.Graduates@tn.gov).

### 6.2. Phase III Submission Process

During the Phase III submission window, all appeals must be submitted before the deadlines outlined in [Table 2](#). Districts must complete the following for their Phase III appeals to be reviewed:

- Complete the [Cohort Phase III Appeals Submission Worksheet](#)
  - See [Section 6.2.1](#) for how to complete the worksheet.
  - Save the worksheet as an Excel file with the naming convention “###\_Appeals\_Submission\_Worksheet” where ### is the district number.

- Compile Supporting Documentation
  - If submitting documentation for a summer graduate or 60-day approval appeal, please save all supporting documentation for all students ordered by student State ID Number within a single PDF file. The PDF file should have the naming convention “###\_Appeals\_SupportingDocumentation” where ### is the district number. Refer to [Section 5.1](#) for appealable situations and required documentation. Any appeals without supporting documentation for the appealed students will be denied automatically.
  - If submitting documentation for a federal graduation rate appeal, please save all supporting documentation for all students ordered by student State ID Number within a single PDF file. The PDF file should have the naming convention “###\_FedGradRate\_SupportingDocumentation” where ### is the district number. Refer to [Section 5.1.7](#) for appealable situations and required documentation. Any appeals without supporting documentation for the appealed students will be denied automatically.
- Submit the worksheet and supporting documents using the [2023-24 Graduation Cohort Phase III Appeals Form](#).

During the remediation window, districts shall review the initial appeals response letter and resubmit the worksheet and the supporting documents, as appropriate, for the denied appeals using the [2023-24 Graduation Cohort Phase III Appeals Form](#). Repeat the same process as described above **ONLY** for the records with appropriate documentation to support the denied appeals. The Phase III submission process is discussed in detail in the following sections.

### 6.2.1. Phase III Worksheet

Please follow all directions listed below very closely to support the timely and accurate resolution of the appeals in question. Any questions related to the Cohort process should be directed to [TNEd.Graduates@tn.gov](mailto:TNEd.Graduates@tn.gov).

**Step 1.** Download the [Cohort Phase III Appeals Submission Worksheet](#) from the Cohort application or TDOE website.

**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 [TNEd.Graduates@tn.gov](mailto:TNEd.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.

- a. 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.
  - a. 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:** Fill out the “2023\_Fed\_Grad\_Rate” 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 and the student’s first name in cell F2.
- d. Enter the student’s graduation cohort (2024) in cell G2.
- e. Enter the graduation course requirement being appealed (Algebra II/Integrated Math III or Chemistry/Physics) in cell H2.
- f. Enter the reason for the appeal in cell I2.
- g. Enter the title of the course student completed to meet the graduation requirement in cell J2
  - If appealing a college-level course substitution, please enter the title of the course as it appears on the student’s supporting documentation (transcript or SIS report).
- h. Enter the course code of the course student completed to meet the requirement in cell K2.
- i. Enter the school year when the student received the credit for the appealed course in L2.

**Step 5.** 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.

### 6.2.2. Phase III Submission Form

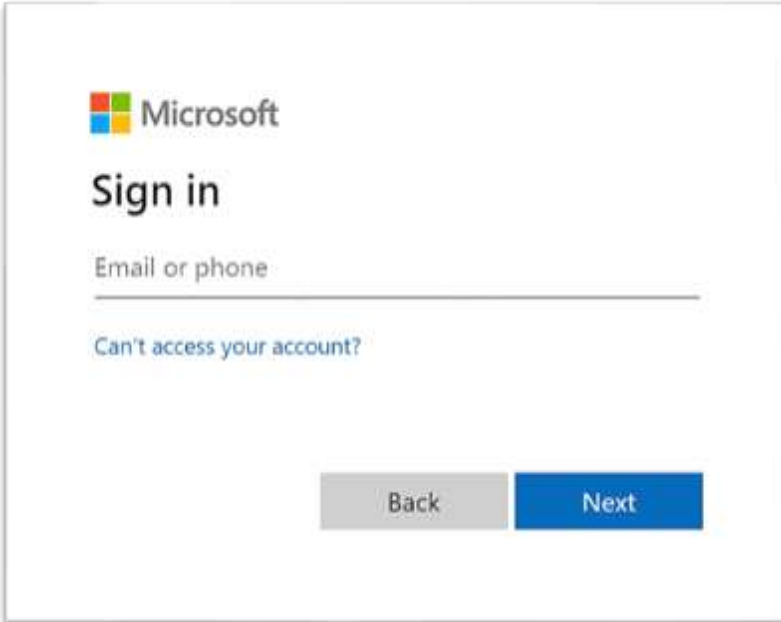
All Phase III appeals must be submitted using the [2023-24 Graduation Cohort Phase III Appeals Form](#) before the deadlines outlined in [Table 2](#). The person submitting the appeals form must have an Orion/SSO account to submit the form. Districts will need to provide the following information when submitting the form:

- District Number
- District Name
- Name and Email of the person submitting the form
- Director of Schools Name
- Director of Schools Email
- [Cohort Phase III Appeals Submission Worksheet](#)

- must be submitted as an Excel file with the naming convention **“###\_Appeals\_Submission\_Worksheet”** where ### is the district number.
- Supporting documentation
  - Supporting documentation for the approved summer graduate appeal and/or 60-day appeal(s) must be submitted as a single pdf file ordered by student State ID with the naming convention **“###\_Appeals\_SupportingDocumentation”** where ### is the district number.
  - Supporting documentation for a federal graduation rate appeal must be submitted as a single PDF file ordered by student State ID with the naming convention **“###\_FederalGradRate\_SupportingDocumentation”** where ### is the district number.
  - **Important Note:** Documentation must be provided for each student being appealed. Failure to include supporting documentation will result in a denial.

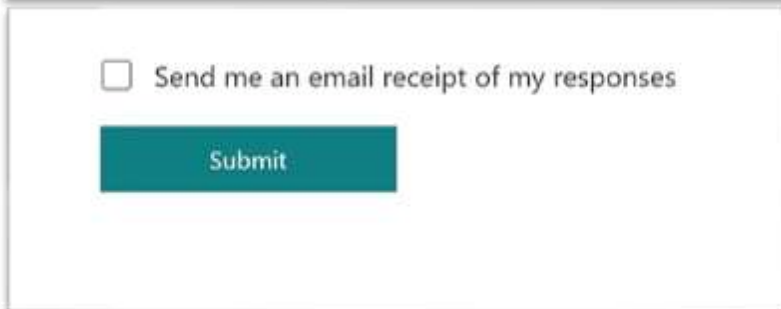
All Phase III appeals and required documentation shall be submitted before the deadlines outlined in [Table 2](#). Any submissions after the deadline will be denied. If you need assistance submitting the [Form](#), please consult the Microsoft Form Login and Troubleshooting Guide (see [Appendix](#)) or email [TNEducation@tn.gov](mailto:TNEducation@tn.gov).

# Appendix: Microsoft Form Login and Troubleshooting Guide



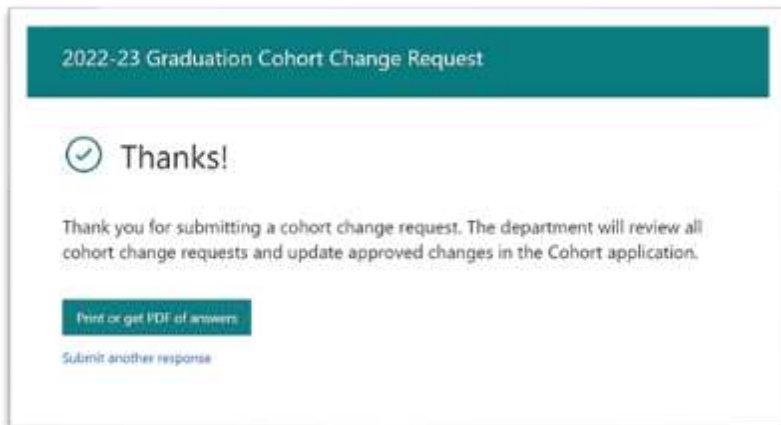
## Microsoft Form Login Requirements

- School and district accountability staff must have an SSO/Orion account to submit a Microsoft Forms for accountability-related data appeals, including ACT, Cohort, *Ready Graduate*, accountability data files, accountability and designation, and Report Card data verification process.
- When clicking on the Microsoft Form link, staff will be prompted to sign in. Make sure to sign in with your SSO/Orion account.
- If staff have trouble logging into their SSO/Orion account, they should refer to the [User Guide](#) and contact [DT.Support@tn.gov](mailto:DT.Support@tn.gov) for assistance.



## Submitting a Form

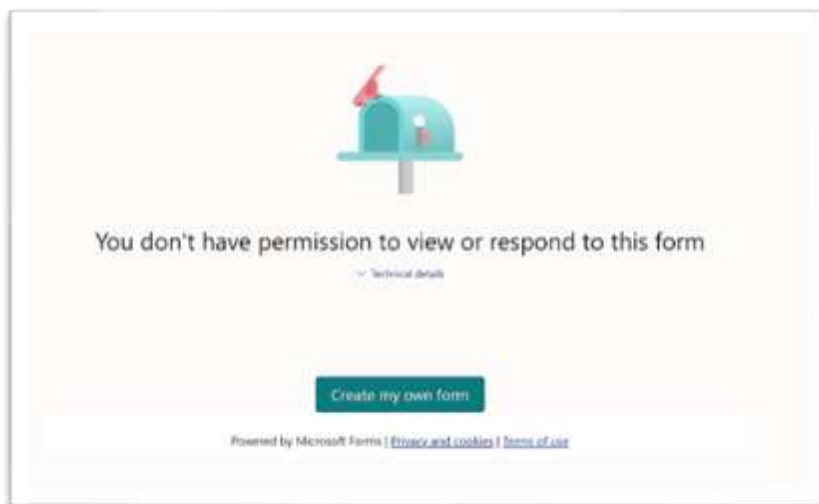
- Staff shall answer all questions and upload the required documentation following the instructions provided by the department.
- When ready to submit, check "Send me an email receipt of my responses" to receive a record of the submission.
- After clicking the Submit button, staff also has the option to save a PDF version of the submission by selecting "Print or get PDF of answers."



### Troubleshooting Common IT issues

If the message to the right shows up when attempting to access the Microsoft form, please attempt the following:

- If the SSO/Orion login information has saved in the internet browser previously, and if
- Using Google Chrome, open a new incognito window and re-sign into the SSO/Orion account.
- Using Microsoft Edge, open a new InPrivate window and re-sign into the SSO/Orion account.
- Using Firefox or Safari, open a new private window and re-sign into the SSO/Orion account.
- If attempting to open the Microsoft forms link from within the data appeals resource guides, make sure the form window opens in the same browser in which the resource guide was opened.



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