



OFFICE OF RESEARCH AND EDUCATION ACCOUNTABILITY

GRADUATION AND DROPOUT RATES IN TENNESSEE



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Introduction

For decades, the perceived effectiveness of K-12 education systems has been measured in part by high school graduation rates. Accordingly, schools with low graduation rates have been a cause for concern and subject to related accountability provisions. Until recently, though, federal law did not require states to use a specific formula for calculating graduation rates, leading to inconsistent data that was difficult to analyze and compare.

The federal Every Student Succeeds Act (ESSA) of 2015¹ requires states to use a specific formula for calculating graduation rates: the adjusted cohort graduation rate (ACGR). The ACGR compares the number of 12th grade students who graduate with a regular diploma with the number of students enrolled in 9th grade four years earlier, referred to as a cohort. Students who exit a district for reasons such as transferring to another school district, withdrawing to home school, or moving to another country are removed from the cohort and do not negatively impact the district's ACGR.

States must report a four-year ACGR according to federal rules. The ACGR for Tennessee was 89.8 percent for the 2021-22 school year.

The **adjusted cohort graduation rate (ACGR)** is determined by dividing the number of students who graduate in a year by all of those who began with the cohort in 9th grade four years earlier.

The **cohort dropout rate** is determined by dividing the number of students who fit the dropout criteria (see p. 3) by all of those who began with the cohort in 9th grade four years earlier.

A **cohort** is based on the number of students who enter 9th grade for the first time. Cohorts are adjusted by adding into the cohort any student who transfers in later and subtracting any student from the cohort who transfers out, emigrates to another country, transfers to a prison or juvenile facility, or dies during that same period.

Federal law does not, however, require states and districts to track and report dropout rates, though dropout data is collected from states by the U.S. Department of Education (USDOE). Nearly half of all states, including Tennessee, voluntarily report dropout rates on the education report cards required by ESSA.^A Students are classified as dropouts based on high school completion and withdrawal criteria. Tennessee's high school dropout rate was 8.6 percent for the 2021-22 school year.

In response to a legislative request, the Comptroller's Office of Research and Education Accountability (OREA) studied the federal and state criteria used for determining dropout rates and graduation rates. OREA also examined criteria that could be considered beyond the control of districts and schools, as well as any flexibility provided by the USDOE and the Tennessee Department of Education (TDOE) to districts and schools. Additionally, OREA was asked to study whether the criteria for determining dropouts have a disproportionate impact on urban schools and districts and those which serve large special populations (e.g., students with disabilities, English learners, etc.).

^A In 1997, the General Assembly passed Public Chapter 215 to include dropout rates in Tennessee's annual report from TDOE's commissioner. In 2007, the General Assembly passed Public Chapter 358 requiring disaggregated graduation rate data be published in the annual report card and made available online. Dropout rate data was also published online beginning with Tennessee's 2007 report card.

Federal law requires states and districts to report the adjusted cohort graduation rate but not dropout rates

Dropout rates

The federal government does not require the tracking and reporting of dropout rates.^B At least 22 states, including Tennessee, voluntarily post dropout rates on their annual state report cards, however.

National dropout data from the past three years is unreliable due to effects of the COVID-19 pandemic, including the suspension of state policies used to categorize dropouts^C and inconsistent attendance tracking. Additionally, states use varying definitions for dropout rates, so national data is difficult to compare. For example, some states (e.g., Colorado) report dropout rates that measure how many 7th-12th graders disenroll from schools in a given year. Tennessee uses a cohort dropout rate formula, which divides the number of students who fit the dropout criteria by all those who began with the cohort in 9th grade four years earlier (including all graduates, GED completers, and dropouts), rounded to one decimal place. This is the formula used to calculate the dropout rates posted on the state's annual report card. Several other states, including New York, Texas, and Michigan, also use a cohort dropout rate formula.

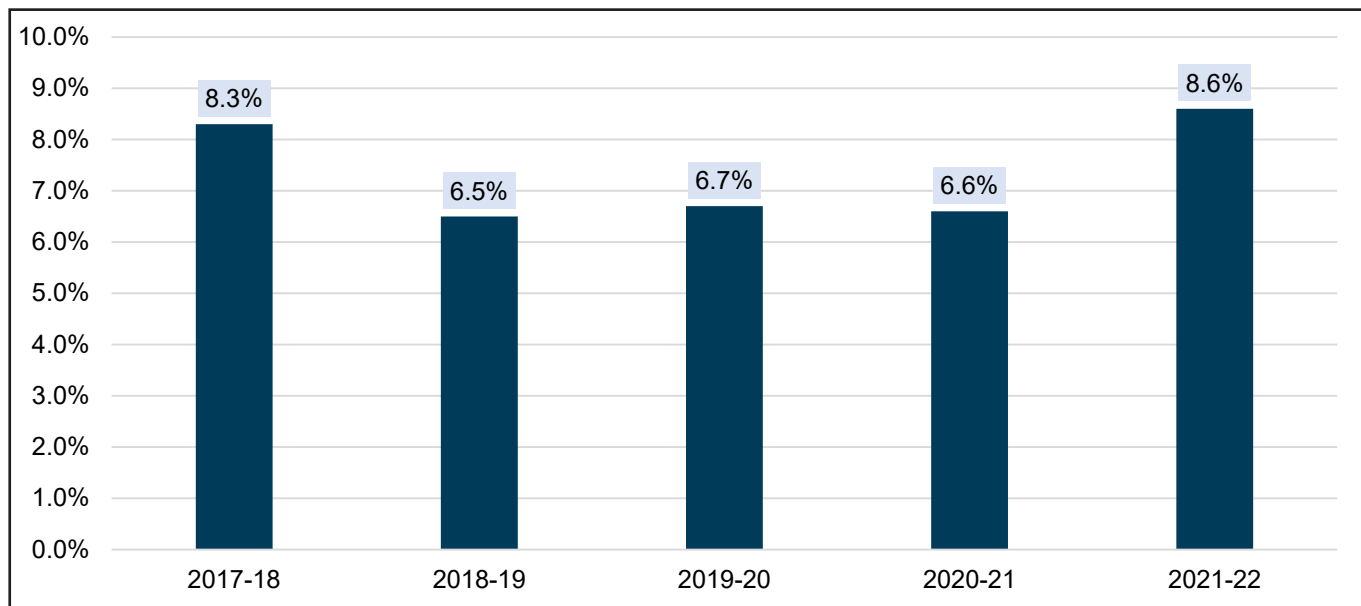
Tennessee uses a **cohort dropout rate formula** based on the same 9th grade cohort used for calculating the ACGR.

$$\frac{\text{Total number of dropouts}}{\text{Total number of students in the 9th grade cohort}}$$

Tennessee's dropout rate was 8.6 percent in 2021-22

Tennessee's high school cohort dropout rate decreased from 8.3 percent in the 2017-18 school year to 6.5 percent in 2018-19. Rates for the next two school years remained steady amid the COVID-19 pandemic. In the 2021-22 school year, however, the dropout rate rose to 8.6 percent, a 2 percentage point increase from the previous year.

Exhibit 1: Tennessee's dropout rate dropped by nearly 2 percentage points in 2018-19, but rose by 2 percentage points in 2021-22



Source: Tennessee Department of Education.

^B USDOE, through its statistical agency the National Center for Education Statistics (NCES), collects dropout data through surveys administered by the U.S. Census Bureau and U.S. Bureau of Labor Statistics. NCES reports dropout rates using two definitions. The *event dropout rate* measures the percentage of 15-24 year olds in grades 10 through 12 who left high school between one October and the next (e.g., October 2020 to October 2021). The *status dropout rate* measures the percentage of all 16-24 year olds who are not enrolled in school and do not possess a high school diploma or an alternative credential (e.g., GED or HiSET). Both rates differ from the *cohort dropout rate* formula used by Tennessee.

^C For example, in 2020, Oregon officials suspended a policy that automatically counted as a dropout any student who missed 10 or more consecutive days. The policy was reinstated in the 2021-22 school year, resulting in a dropout rate increase from 1.8 to 4 percent.

In 2021-22, 27 districts had dropout rates above the state rate of 8.6 percent. Eight districts had dropout rates of over 15 percent. The Achievement School District posted the highest dropout rates in the state that year at 42.9 percent.

Exhibit 2: Eight districts had dropout rates of over 15 percent in 2021-22

District	Count of graduation cohort	Dropout rate
Achievement School District	511	42.9%
TN School for the Blind	15	20.0%
West Carroll	67	19.4%
Memphis-Shelby County	7,563	18.1%
Richard City	24	16.7%
Davidson County	5,846	16.2%
TN Public Charter School Commission	120	15.8%
Carter County	451	15.1%

Note: The Education Division of the Department of Children’s Services is excluded from this list because it is a nontraditional district where students are often temporarily enrolled.

Source: Tennessee Department of Education.

Most Tennessee school districts had dropout rates at or below the state rate in 2021-22, including 12 districts with rates of 1 percent or lower. Six districts reported zero dropouts in that year’s graduation cohort.

Exhibit 3: Twelve districts had dropout rates of 1 percent or lower in 2021-22

District	Count of graduation cohort	Dropout rate
Huntingdon	99	1.0%
Alvin C. York Institute	103	1.0%
Meigs County	120	0.8%
Milan	138	0.7%
Wayne County	167	0.6%
Greeneville	199	0.5%
Alcoa	171	0.0%
South Carroll	30	0.0%
Clay County	76	0.0%
Bradford	42	0.0%
Oneida	77	0.0%
TN Schools for the Deaf	15	0.0%

Source: Tennessee Department of Education.

Graduation rates

Federal law did not require states to report graduation rates until the No Child Left Behind Act of 2001 (NCLB). NCLB expanded education accountability under Title I of the Elementary and Secondary Education Act (ESEA) by requiring states to measure adequate yearly progress on standardized math and reading tests and at least one other academic indicator, which for high schools was graduation rates. NCLB gave states the flexibility to set their own target graduation rates, and states had to meet or exceed their target rates to meet the required adequate yearly progress threshold. The law did not specify a minimum target graduation rate for states, nor did it require states to increase their graduation rates over time.

States also had the flexibility under NCLB to decide which formula to use to calculate their graduation rates, as long as the rate was – as the law required – “valid and reliable.” As of July 2005, 12 states used a cohort graduation rate definition, while Tennessee was one of 32 states that used a departure classification definition,

also known as the “leaver rate” formula. The “leaver rate” formula divided the number of on-time graduates by the number of high school “leavers,” including the number of graduates in a given year – regardless of when they started high school and how long it took them to graduate – and dropouts. The formula was considered unreliable because it was not based on a cohort of students who started high school four years prior and because it depended on the reliability of dropout data. Additionally, some states that used the leaver rate formula counted students who received a general equivalency diploma (GED)^D as graduates; NCLB prohibited this practice.²

The use of varying formulas under NCLB resulted in state data that was difficult to compare and lacked consistent quality. In 2008, the USDOE published a rule requiring states to transition to an adjusted cohort graduation rate (ACGR). The Every Student Succeeds Act (ESSA) of 2015, which replaced NCLB, codified the USDOE rule.^E The USDOE published corresponding regulations in 2016.³ Tennessee started using the ACGR with its 2010-11 high school cohort.

States must follow strict federal guidelines to calculate the ACGR

The ACGR includes only those students who receive a regular high school diploma or a state-approved alternate diploma, which is available for students with the most significant cognitive disabilities (see box for more information on Tennessee’s alternate academic diploma). A student cannot be included in the ACGR of a school or district if they earned a GED, certificate of completion, certificate of attendance, or similar credential.

States must follow strict federal guidelines established in ESSA and USDOE rules when forming a 9th grade cohort, when adjusting the cohort over the next four years, and when calculating the ACGR at the end of the summer following a cohort’s fourth year of high school.

Alternate academic diplomas

Federal law gives states the option to offer a state-defined alternate diploma to students with the most significant cognitive disabilities. The alternate diploma must be standards-based and aligned with the state’s requirements for a regular diploma. Students who receive the alternate diploma count as graduates in the state’s adjusted cohort graduation rate calculation.

Tennessee’s alternate academic diploma (AAD) was first implemented in the 2018-19 school year. The AAD is available at all public high schools in Tennessee and counts towards school and district graduation rates.

Requirements for participation include:

- participation in high school alternate assessments,
- minimum of 22 course credits,
- receipt of special education services and supports and satisfactory progress on an individualized education program (IEP),
- satisfactory attendance and conduct records, and
- a completed transition assessment that measures postsecondary education and training, employment, independent living, and community involvement.

Forming a cohort

The ACGR measures the number of students within a cohort who graduate on time (i.e., within four years of starting high school). Students are grouped into cohorts based on when they enter 9th grade for the first time. A 9th grade cohort includes students who enrolled in a high school no later than the date by which student membership data is collected annually by USDOE (on or about October 1).

^D As of 2016, the GED is no longer offered in Tennessee, and the only high school equivalency exam offered in Tennessee is the High School Equivalency Test (HiSET).

^E ESSA requires states to publish an annual report card that includes the ACGR as well as other academic and performance indicators disaggregated by student subgroups.

A student who transfers into a high school at any point after a 9th grade cohort is formed must be assigned to the cohort year in which the student started 9th grade for the first time, regardless of factors such as progress towards graduation. For example, a student who starts 9th grade in 2023-24 is expected to graduate with his cohort in 2027. If the student drops out after his freshman year (missing the 2024-25 school year) and returns for the 2025-26 school year after a year out of school, he will remain in his original cohort but will be a year behind on the credits needed for graduation. If the student is unable to make up the missing credits in time to graduate by the end of the summer following the 2026-27 school year, the student will not count as a graduate and will negatively affect the school and district's graduation rate.^F

Adjusting a cohort

Once a 9th grade cohort is formed, it may be adjusted only within the guidelines set by ESSA and USDOE rules. According to federal guidelines, a state may allow cohort adjustments *only* for students who have:

- transferred *into* a cohort (i.e., enrolled in a high school after the beginning of the cohort's first year in high school, at any point through 12th grade);
- transferred *out* to a high school or educational program from which the student is expected to receive a regular high school diploma or state-approved alternate diploma (e.g., a public school in another district or state, private school, or homeschool program);
- emigrated to another country;
- transferred to a prison or juvenile facility that offers a regular high school diploma or state-defined alternate diploma;^G or
- died.

To remove a student from a cohort, the school or district must have written confirmation of one of the above reasons. Without written confirmation, a student must remain in the cohort. Forms of acceptable written confirmation include records from the receiving public or private school, a letter of withdrawal from a homeschooling parent or guardian, or written confirmation of a student's death or emigration to another country.^H Students may be added to and/or removed from a cohort until their expected graduation by the end of the summer four years after the start of 9th grade (e.g., the cohort that started 9th grade in 2023 is expected to graduate by the end of summer 2027).

A state may *not* allow cohort adjustments for students who are:

- retained in a grade,
- enrolled in a GED or HiSET program, or
- transferred to a prison or juvenile facility that does not provide (or from which the student is not expected to receive) a regular high school diploma or state-defined alternate diploma (e.g., the alternate academic diploma in Tennessee).

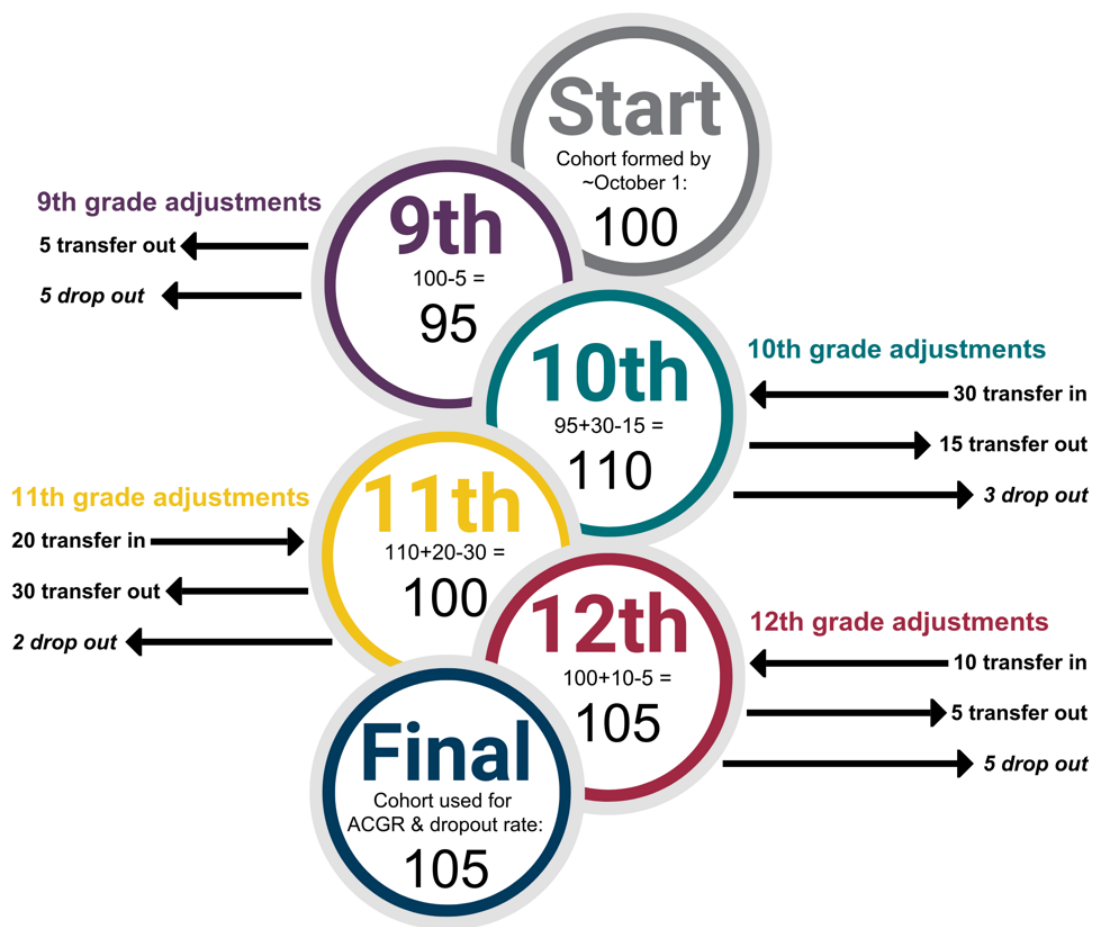
These students must remain in the adjusted cohort and will negatively affect the district and school's graduation rate. Students who complete a GED or HiSET program remain in the cohort and do *not* count as graduates, but they also do *not* count as dropouts when calculating the dropout rate. Students who drop out and do not complete a GED/HiSET remain in the cohort and negatively impact both the ACGR and the dropout rate.

^F In the 2023 TDOE graduation cohort process, "end of summer" typically means the earliest first day of the fall semester in Tennessee.

^G See page 18 for more information on incarcerated students.

^H In the case of death or emigration, official death certificates or school records from a foreign school are not necessary.

Exhibit 4: Example of cohort adjustments over four years of high school



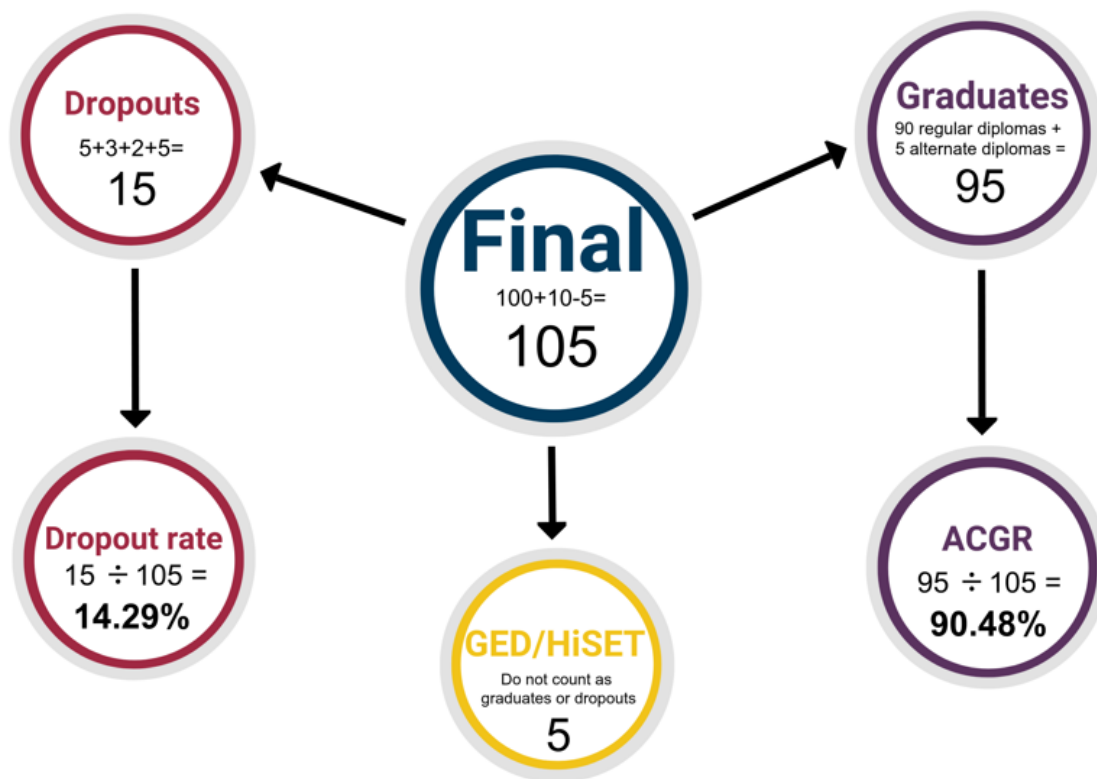
Note: Students who drop out at any point in high school remain in the 9th grade cohort used to calculate the ACGR and dropout rates.

Calculating the ACGR

At the end of the summer following a cohort's fourth year of high school, districts and schools calculate the ACGR using the original 9th grade cohort as the base. In the ACGR equation, the *denominator* is the number of first-time 9th grade students in the starting cohort, including those who dropped out at any point between 9th grade and the end of the summer following the fourth year of high school, as well as any students who transferred into the cohort at any point through their senior year. Students who fall into the approved categories for removal (e.g., transferred to a school in another state) are subtracted from the denominator.

The number of students in the cohort who earned on-time regular high school diplomas or state-approved alternate diplomas is the *numerator* of the equation. The ACGR is calculated by dividing the numerator by the denominator, as shown in Exhibit 5. Additionally, the final adjusted cohort is used as the denominator in the dropout rate formula.

Exhibit 5: Example of how the ACGR and dropout rate are calculated



Note: Students who drop out at any point in high school remain in the 9th grade cohort used to calculate the ACGR and dropout rates.

The extended-year ACGR

ESSA gives states the option to report an extended-year adjusted cohort graduation rate. The extended-year ACGR uses the same formula as the regular ACGR but includes the number of students in the cohort who earned a regular high school diploma or alternate diploma one or more years beyond the fourth year of high school (e.g., a five-year ACGR). Over half of all states publish an extended-year ACGR on their annual state report cards. At least five states track and report rates up to seven years beyond when a cohort starts high school. Tennessee does not track and report an extended-year ACGR.

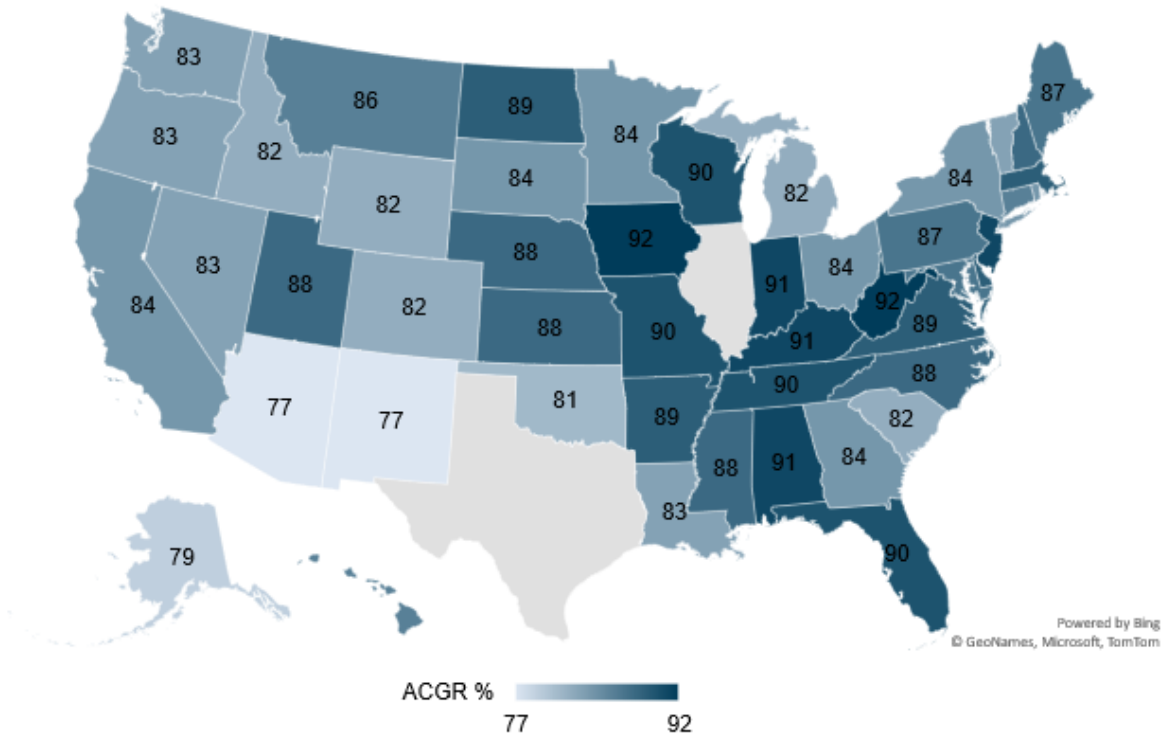
Tennessee's ACGR has been steady since 2018

Tennessee's ACGR has remained steady over the past few school years, with slight fluctuations each year. The graduation rate in 2017-18 and 2018-19 was 88.5 and 89.1 percent, respectively. When graduation requirements were adjusted temporarily due to the COVID-19 pandemic, Tennessee's ACGR increased to 89.7 percent for the 2019-20 school year.^{1,4} Tennessee ranked 7th in the nation for graduation rates that year. The graduation rate for the nation was 87 percent in 2019-20, up from the 79 percent recorded for the 2010-11 school year.^{1,5}

¹ In March 2020, the Tennessee General Assembly passed Public Chapter 652 authorizing the State Board of Education to promulgate emergency rules to address the effects of the COVID-19 pandemic. The emergency rules lowered the number of credits required for graduation from 22 to 20 for the 2019-20 school year, including four math credits, four English credits, three science credits, and two social studies credits. Additionally, students in 12th grade that year were not required to take the state civics test or the ACT/SAT. Graduation requirements reverted to pre-pandemic criteria for the 2020-21 school year.

¹ A 2020 study by the Brookings Institution showed that national high school graduation rates increased in the 2019-20 school year, presumably due to relaxed graduation requirements in response to the COVID-19 pandemic. The study found that national rates returned to pre-pandemic levels in 2020-21.

Exhibit 6: Tennessee’s ACGR ranked 7th in the nation in 2019-20⁶

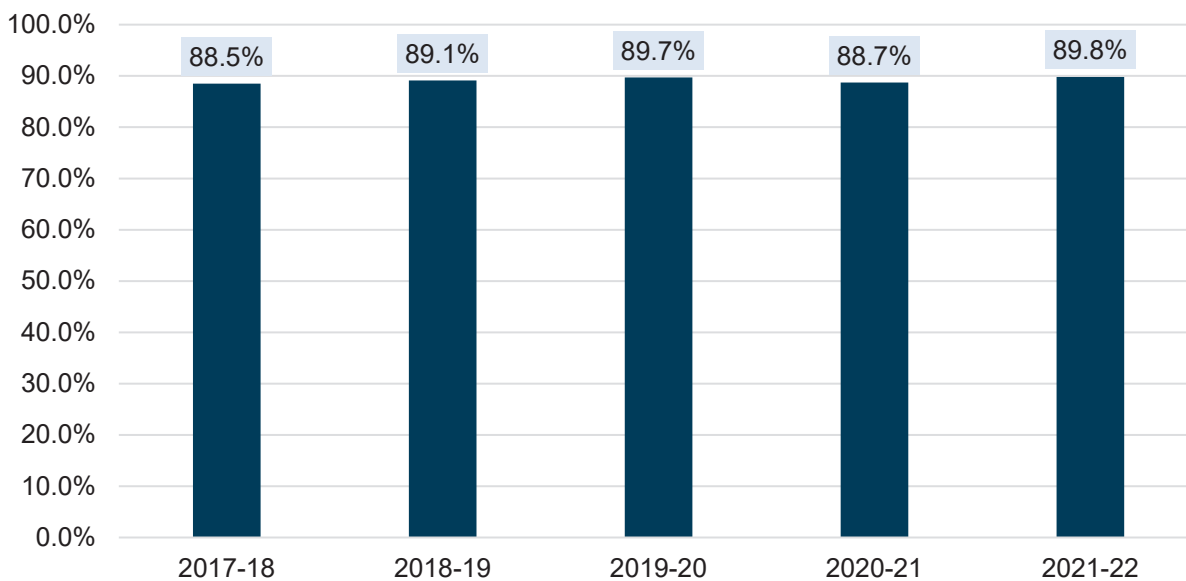


Notes: (1) Reliable data was unavailable for Illinois and Texas, but the national ACGR includes estimated rates for both states. (2) Some states adjusted graduation requirements for the 2019-20 school year due to effects of the COVID-19 pandemic. (3) Graduation rates are rounded to the next whole number. Source: National Center for Education Statistics, *The Condition of Education 2023*, Public High School Graduation Rates, U.S. Department of Education, Institute of Education Sciences, <https://nces.ed.gov/programs/coe/indicator/coi>.

In the 2020-21 school year, Tennessee’s ACGR decreased by 1 percentage point. In 2021-22, the ACGR rose to 89.8 percent. Between 2017 and 2022, the state’s ACGR did not change by more than 1.2 percentage points.

TDOE released guidance in March 2023 regarding an additional verification process to ensure Tennessee’s ACGR is calculated per federal guidelines. (See page 16 for more information.) A subgroup of students will be removed from the numerator of the federal graduation rate calculation if they do not meet the federal graduation rate guidelines, which may affect Tennessee’s reported ACGR starting with the 2022 cohort.

Exhibit 7: Tennessee’s ACGR has been steady over the past few years | 2018-2022



Source: Tennessee Department of Education.

The ACGR of most Tennessee school districts (96 out of 132 districts^K) was over 90 percent for the 2021-22 school year. Nine school districts had graduation rates of 98 percent or higher.

Exhibit 8: Nine districts had ACGRs of 98 percent or higher for the 2021-22 school year

District	Count of graduation cohort	Count of graduates	ACGR
Alvin C. York Institute	103	102	99.0%
Stewart County	176	174	98.9%
Trousdale County	83	82	98.8%
Milan	138	136	98.6%
Greeneville	199	196	98.5%
Alcoa	171	168	98.2%
Dyersburg	155	152	98.1%
Huntingdon SSD	99	97	98.0%
Wilson County	1,632	1,599	98.0%

Source: Tennessee Department of Education.

Twenty-five districts had ACGRs of between 80 and 90 percent for 2021-22. The graduation rates of four districts was under 80 percent.

Exhibit 9: Four districts had ACGRs of under 80 percent for the 2021-22 school year

District	Count of graduation cohort	Count of graduates	ACGR
West Carroll	67	53	79.1%
TN Schools for the Deaf	*	*	60.0%
Achievement School District	511	262	51.3%
TN School for the Blind	*	*	6.7%

Notes: (1)* The precise number has been withheld to protect student privacy in accordance with TDOE’s suppression policy. (2) The Education Division of the Department of Children’s Services is excluded from this list because it is a nontraditional district where students are often temporarily enrolled.

Source: Tennessee Department of Education.

TDOE and the graduation cohort process

USDOE places responsibility on states for ensuring the integrity and quality of its ACGR calculation and the data it uses for those calculations. States are required to maintain data systems that accurately report the ACGR through policies, procedures, infrastructure, and internal controls, including business rules, data quality checks, official guidance documents, and procedures for monitoring district data reporting. ESSA outlines state responsibilities for ensuring the integrity and quality of graduation rate calculations.¹

TDOE has created a process through which districts and schools can update data related to student enrollment and graduation status through their student information systems and other platforms supported by the department. Codes are used to indicate student status, and TDOE annually releases Education Information Systems (EIS) Appendices to support districts and schools with valid codes for withdrawal, completion (or graduation), enrollment, and other categories.

In Tennessee, graduation rate calculation, verification, and reporting processes are overseen by the TDOE. The department outlines these processes in its Graduation Cohort Protocol, published annually.⁷ The protocol contains definitions, reporting codes, a reporting timeline with dates specific to that cohort year, and appeals processes.

^K There are 148 school districts in Tennessee, of which 132 serve some number of students in 12th grade.

¹ In 2017, USDOE issued high school graduation guidance to provide states, districts, and schools with information to assist them in meeting their obligations under ESSA. See Appendix A for more information on this guidance.

Tennessee schools use nine completion codes to track the graduation status of each student in a cohort.^M

Exhibit 10: Tennessee completion codes

EIS code	Completion document type	Status
1	Regular diploma	Graduate
3	Special education diploma and did not take alternate assessments	Non-graduate
5	No diploma; senior but did not complete	Non-graduate
6	GED (also used for HiSET – high school equivalency test)	Non-graduate
7	Occupational Diploma (valid as of 2015-16) – Completed the occupational diploma Skills, Knowledge, and Experience Mastery Assessment (SKEMA) and two years of paid or non-paid work experience	Non-graduate
8	Alternate Academic Diploma (AAD) – Students graduating with a special education diploma who are taking the alternate assessment and who meet the graduation requirements set by the state board	Graduate
11	Regular diploma with foreign language waiver	Graduate
12	Regular diploma with fine arts waiver	Graduate
13	Regular diploma with foreign language and fine arts waiver	Graduate

Note: EIS code numbers are skipped when a code is no longer in use and removed as an option in EIS.
 Source: Tennessee Department of Education.

Additionally, Tennessee has a system of 16 withdrawal codes, 14 of which are used to track a student’s status in the graduation cohort and whether or not they count as a dropout. (See Exhibit 11.)

Exhibit 11: Tennessee withdrawal codes

EIS code	Withdrawal type and definition	Number of times used for 2022 cohort	Cohort status	Counted as dropout?
0	Dropout, under 18. Transfers to adult high schools, GED program, or Job Corps should be coded as dropouts.^	1,267	Remains in cohort	Yes, unless the student earns an on-time high school diploma or passes the HiSET by the end of the summer after their cohort graduates
1	Dropout, 18 and over. Transfers to adult high schools, GED program, or Job Corps should be coded as dropouts.^	2,019	Remains in cohort	Yes, unless the student earns an on-time high school diploma or passes the HiSET by the end of the summer after their cohort graduates
2	Withdrawn and placed in the custody of the Department of Children’s Services (DCS) to be educated in a youth development center or DCS-affiliated school.	23	Removed from cohort	No
3	Transferred to other Tennessee school system.	733	Removed from cohort; placed in another district’s cohort	No
4	Transferred to other school in the same system.	925	Remains in district’s cohort and reassigned to new school	No

^M To track student status, schools and districts enter data in an information system linked to the state’s Education Information System (EIS), an operational database maintained by TDOE. EIS contains all electronic education data on student demographics, attendance records, course credits, and more. EIS data is used to satisfy federal data reporting requirements, including the ACGR.

EIS code	Withdrawal type and definition	Number of times used for 2022 cohort	Cohort status	Counted as dropout?
5	Transferred out of state. Proof that the student is actually enrolled is required.	5,647	Removed from cohort	No
6	Transferred to any Tennessee non-public school contained on the state list. Proof that the student is actually enrolled is required.	3,056	Removed from cohort	No
7	Doctor-certified permanent withdrawal. This code should be used only for students who are so sick or incapacitated (in the opinion of a physician licensed by the State Board of Medical Examiners) that no return to school is anticipated and the withdrawal is considered permanent. Students with a temporary medical condition should be kept enrolled and treated as homebound students.	*	Remains in cohort	Yes
8	Deceased.	144	Removed from cohort	No
10	Withdrawn to a home school (formal intent to register must be on file).	1,239	Removed from cohort	No
11	Court order to placement with the Department of Corrections, county jail, or city jail. (Student was tried and convicted as an adult.) These facilities do <i>not</i> offer regular high school diplomas or alternate academic diplomas.	12	Remains in cohort	Yes, unless the student passes the HiSET by the end of the summer after their cohort graduates
12	Early graduate; a student who receives a regular high school diploma in less than four years.	4,713	Remains in cohort; counted as graduate	No
13	Permanent dismissal from TN voluntary pre-K program	N/A	Not applicable to cohort	N/A
15	TN Early Intervention Services transition; non-eligible for special education services	N/A	Not applicable to cohort	N/A
16	A special education student who has been awarded a completion document and is entitled to continue their education due to the free appropriate public education (FAPE) requirement. This withdrawal is only to be used when the student is withdrawing permanently; it is not to be used to indicate the end of year action when a student is returning the next school year.	*	Only included in the graduation rate of one cohort based on year entered 9 th grade	No
17	Transferred to and enrolled in out-of-state online school; excluded from cohort only if adequate documentation is provided.	3,585	Removed from cohort	No

Notes: (1) * Fewer than 10 students. The precise number has been withheld to protect student privacy in accordance with TDOE's suppression policy. (2) ^As of 2016, the GED is no longer offered in Tennessee, and the only high school equivalency exam offered in Tennessee is the High School Equivalency Test (HiSET). (3) EIS code numbers are skipped when a code is no longer in use and removed as an option in EIS.
Source: Tennessee Department of Education.

The most common reasons students are counted as dropouts in Tennessee’s largest districts

Students counted as dropouts fall into one of the 16 codes used to track students who withdraw from school. For example, a student under the age of 18 who drops out of high school and has not earned a diploma or passed the HiSET falls would be assigned code 0 (zero) and would be counted as a dropout. Other codes are used to track students who transfer to other schools. If there is not official documentation that the student has enrolled in the other school, however, the student will be counted a dropout.^N

Exhibit 12 displays the most common codes used for students counted as dropouts in the 2021-22 school year.^O In Davidson County, the most frequent code used for dropouts was code 0, described previously. The most frequent code used for dropouts in Memphis-Shelby County Schools (MSCS) was code 4, which refers to students who transferred to another school in MSCS. A student who transfers to another school does not necessarily drop out of school. However, the student will be counted as a dropout if the district cannot document the student enrolled in another school.

Exhibit 12: The most common reasons students are counted as dropouts in the state’s largest districts during the 2021-22 school year

	Rutherford County	Hamilton County	Knox County	Davidson County	Memphis-Shelby County Schools	Achievement School District
Code 0: Dropout under 18	23	94	52	353	207	24
Code 1: Dropout 18 and over	45	123	190	349	141	16
Code 3: Expected to transfer to another TN district, but did not enroll	*	*	13	24	70	82
Code 4: Expected to transfer to another school in the same district, but did not enroll	*	*	*	48	537	*
Code 7: Doctor certified permanent withdrawal	*	*	*	*	*	*
Code 11: Court order	*	*	*	*	*	*
No completion or withdrawal code (did not graduate, continue enrollment, or enroll elsewhere)	68	64	55	*	212	78
Other	13	*	39	169	200	11
Dropout total	164	292	357	949	1,369	219
Students in 2022 cohort	4,130	3,137	4,456	5,846	7,563	511

Note: * Denotes fewer than 10 students suppressed in accordance with TDOE’s suppression policy. “Other” includes students who have a withdrawal code with no completion code, as well as students who were seniors but did not complete graduation requirements and have not re-enrolled.

Source: Tennessee Department of Education.

^N In accordance with federal guidelines, students who earn an on-time regular diploma will be counted as graduates, while students who earn a HiSET will be considered non-graduates.

^O The Achievement School District is included in this analysis because all of its 26 schools are located in the state’s largest school districts – Davidson County and Memphis-Shelby County.

Phases of the graduation cohort cycle

There are four phases to the annual graduation cohort cycle. Most phases consist of multiple tasks that a district must complete to ensure the accuracy of the graduating cohort data used to calculate the graduation rate. The phases described below are for the 2022-23 graduation cohort cycle and school year.

2022-23 Phase I: November 28, 2022, until June 30, 2023

In Phase I, districts submit completion information and withdrawal information in their local information systems. TDOE guidance specifies the appropriate code for districts and schools to use based on a student's status at the end of their graduating school year.⁸ The codes and related information submitted by districts is reviewed by TDOE for accuracy and compliance with federal guidelines.

Most students receive a regular diploma and therefore fall under completion code 1. The following completion types and codes are used to calculate a district's graduation rate.

EIS code	Completion document type	Required action
1	Regular diploma	Code and graduation date are entered by district in EIS.
8	Alternate Academic Diploma (AAD) – Students graduating with a special education diploma who are taking the alternate assessment and who meet the graduation requirements set by the state board	Code and graduation date are entered by district in EIS.
11	Regular diploma with foreign language waiver	Code and graduation date are entered by district in EIS.
12	Regular diploma with fine arts waiver	Code and graduation date are entered by district in EIS.
13	Regular diploma with foreign language and fine arts waiver	Code and graduation date are entered by district in EIS.

Source: Tennessee Department of Education.

For students who have withdrawn from a school, however, one of 16 withdrawal codes is used. For some of these 16 codes, no additional steps are required from the district after selecting the code. For other codes, however, districts must supply supporting documentation to TDOE. The documentation must then be approved by TDOE before the requested action can be completed for the student. This process is followed for codes that remove a student from a district's cohort because such students are not included in the district's graduation rate. For example, withdrawal code 5 is used for students who transfer to a school in another state. A Tennessee district seeking to classify a student under code 5 must have official written confirmation that the student enrolled in a school in the other state. Without official written confirmation, the student may not be removed from the cohort and will count against the district in the graduation rate calculation. The following withdrawal codes are used for calculating graduation rates during Phase I:

EIS code	Withdrawal type and definition	Required action
0	Dropout, under 18. Transfers to adult high schools, GED program, or Job Corps should be coded as dropouts.	Code is entered by district in EIS.
1	Dropout, 18 and over. Transfers to adult high schools, GED program, or Job Corps should be coded as dropouts.	Code is entered by district in EIS.
2	Withdrawn and placed in the custody of the Department of Children's Services (DCS) to be educated in a youth development center or DCS-affiliated school.	Code is entered and documentation must be uploaded and approved.
3	Transferred to other Tennessee school system.	Code is entered by district in EIS and remains until student enrolls at new school.

EIS code	Withdrawal type and definition	Required action
4	Transferred to other school in the same system.	Code is entered by district in EIS and remains until student enrolls at new school.
5	Transferred out of state. Proof that the student actually enrolled is required.	Code is entered and documentation must be uploaded and approved.
6	Transferred to any Tennessee non-public school contained on the state list. Proof that the student actually enrolled is required.	Code is entered and documentation must be uploaded and approved.
7	Doctor certified permanent withdrawal. This code should be used only for students who are so sick or incapacitated (in the opinion of a physician licensed by the State Board of Medical Examiners) that no return to school is anticipated and the withdrawal is considered permanent. Students with a temporary medical condition should be kept enrolled and treated as homebound students.	Code is entered and documentation must be uploaded and approved.
8	Deceased.	Code is entered and documentation must be uploaded and approved.
10	Withdrawn to a home school (formal intent to register must be on file).	Code is entered and documentation must be uploaded and approved.
11	Court order to placement with the Department of Corrections, county jail, or city jail. (Student was tried and convicted as an adult.) These facilities do <i>not</i> offer regular high school diplomas or AAD.	Code is entered by district in EIS.
12	Early graduate; a student who receives a regular high school diploma in less than four years.	Code is entered by district in EIS.
17	Transferred to and enrolled in out-of-state online school; excluded from cohort only if adequate documentation is provided	Code is entered and documentation must be uploaded and approved.

Source: Tennessee Department of Education.

In addition, districts can submit cohort change requests to TDOE to address various issues. For example, when a student completes the 8th grade, their information is automatically transferred to their zoned high school. If the student does not actually enroll in that high school, districts can submit a cohort change request. Districts can also submit change requests for issues such as duplicate student identification numbers and students who began 9th grade in a different year from what is shown in the state's Education Information System (EIS).

2022-23 Phase II: July 17, 2023, through August 18, 2023

In Phase II, districts have several tasks to complete and additional opportunities to ensure the codes and documentation are accurate for all students. First, districts must properly report summer graduates in EIS with the appropriate completion code. Next, districts can submit appeals for students whose removal from the cohort was denied by TDOE in Phase I. Districts have the opportunity to upload different documentation or make necessary corrections through appeals.

Districts can also submit a 60-day appeal during Phase II. These appeals are used when a student enrolls in a district for less than 60 days and then withdraws without a diploma. Through a successful 60-day appeal, such students are removed from the district's cohort and reassigned to the district where they spent the majority of their time in high school.

2022-23 Phase III: August 28, 2023, through September 20, 2023

In Phase III, districts may submit appeals for summer graduates that were not approved by TDOE in Phase II. Districts can also submit appeals for students who were added to their cohort after a 60-day appeal filed by another district was approved by TDOE during Phase II. The review and verification of preliminary graduation rates also occurs in Phase III.

2022-23 Phase IV: September 25, 2023, through September 28, 2023

Cohort and graduation data are made available to districts on September 25 before public release on September 28.

60-day appeals in law

A student who has attended the same high school in a district for less than 60 school days of the most recent school year and has dropped out is eligible for a 60-day appeal if they have not enrolled at a new school. The student may be assigned to the high school at which they were enrolled for the greatest proportion of school days while enrolled in grades 9 through 12.

Districts submit appeals to TDOE for students who meet these requirements, and, if approved, the student will not count in the appealing district's cohort and will be assigned to another Tennessee district's cohort. The student may count as a dropout for another Tennessee district if that is where the student spent the greatest proportion of school days throughout grades 9-12.

Source: TCA 49-1-601(a).

Tennessee will start publishing a second graduation rate on the 2023 report card

In April 2021, USDOE's Office of Elementary and Secondary Education conducted a Consolidated Performance Monitoring Report of TDOE.⁹ USDOE relies on these reports in their oversight and assistance of K-12 formula grant programs. Reports use a system of four ratings when assessing state programs: *met requirements with commendation*, *met requirements*, *met requirements with recommendation*, and *action required*.

In its report, USDOE rated TDOE's graduation rate procedures as *action required* because Tennessee's procedures were found to be inconsistent with requirements in federal law. Tennessee law establishes specific requirements that students must meet to earn a traditional high school diploma, including specific courses within a minimum of 22 credits. USDOE found Tennessee allowed certain students with disabilities to obtain a traditional high school diploma based on less rigorous course requirements, particularly in math. USDOE concluded that "despite the less rigorous coursework requirements permitted for some students with disabilities, TDOE includes those students as having received a regular high school diploma for purposes of calculating its ACGR." To correct the issue, the USDOE required TDOE to submit updated procedures for calculating graduation rates. TDOE was to begin using these updated procedures for the 2021-22 school year. TDOE was also required to provide USDOE with evidence that the updated procedures for calculating graduation rates were communicated to districts for the 2021-22 school year.

USDOE required Tennessee to recalculate graduation rates for the 2022 cohort. Tennessee also recalculated graduation rates for the prior year (the 2021 cohort) because of graduation-related accountability provisions. The improvement target for graduation rates is based on the prior year's rate; thus, Tennessee recalculated the rate for 2021 as well as 2022 so that both years used the same calculation method.¹⁰

Based on the findings from the Consolidated Performance Monitoring Report and subsequent USDOE notices, TDOE published guidelines in March 2023 to address the required action steps outlined by USDOE. Moving forward, TDOE will calculate and report two graduation rates for accountability purposes beginning with the 2023 cohort:

- The *federal graduation rate* will be reported on the state report card and used to identify schools according to federal accountability requirements.^P The rate will also be used for other federal reporting purposes. The federal graduation rate will be calculated following federal guidelines. Only students who complete all required math courses will be counted as having received a regular high school diploma.
- The *Tennessee graduation rate* will be used to calculate the Ready Graduate rate and ACT/SAT participation rates per State Board policy.^{11, Q} The Ready Graduate rate measures the percent of students who earn a regular high school diploma and meet specific milestones that increase the probability for postsecondary success (e.g., earning a composite score of 21 or higher on the ACT.) Tennessee's Ready Graduate indicator is a school quality and student success indicator in the state's ESSA plan and appears on the state's annual report card. Tennessee students must take the ACT/SAT to receive a regular high school diploma.

Tennessee voluntarily reports dropout rates on the state report card

The dropout rate as shown on the annual state report card reflects the number of Tennessee students who dropped out of high school or withdrew from a school or district without enrolling elsewhere or obtaining either a regular diploma or an alternate academic diploma (AAD). TDOE calculates dropout rates by dividing the number of dropouts by the number of students in the graduation cohort, rounded to one decimal place.^R

Dropouts include students who:

- are coded as withdrawing from school altogether, transferring to another school in the same district, or transferring to another Tennessee district and have not received a regular diploma, an alternate academic diploma, or passed the HiSET before the end of summer after their cohort's high school graduation date, or
- are not enrolled in school as of October 1 after their cohort's high school graduation date and do not have a withdrawal code (e.g., transferred out of state) or a completion code (e.g., passed the HiSET), or
- are not coded as withdrawing or receiving a regular diploma, an alternate academic diploma, or passed the HiSET by the end of their cohort's on-time graduation date, but are coded as withdrawing from school altogether, transferring to another school in the same district, or transferring to another Tennessee district in the following school year.

Using guidance from the National Center for Education Statistics (NCES), TDOE defines a dropout as an individual who:

- was enrolled in school at some time during the previous school year;
- was not enrolled at the beginning of the current school year;
- has not graduated from high school or completed a state-approved educational program; and
- does not meet any of the following exclusionary conditions:
 - transfer to another public school system, private school, or specifically approved state education program,
 - temporary absence due to suspension or excused illness, or
 - death.

Students are also classified as dropouts after 10 consecutive days of unexcused absences and after all requirements for truancy intervention have been followed, according to the TDOE Attendance Manual.^{12, S}

^P Any school with a graduation rate of less than 67 percent is designated a priority school, as are those among the lowest performing five percent of schools in the state. Priority schools are identified every three years. Additional Targeted Support and Improvement (ATSI) schools are those with a student group (e.g., English learners, students with disabilities, etc.) that meets the priority schools' criteria. For example, a school with a graduation rate of less than 67 percent for students with disabilities would be designated an ATSI school. ATSI schools are identified every three years.

^Q State Board of Education High School Policy 2.103.

^R The dropout rate figures on the annual state report card lag by one year (i.e., the dropout rate listed on the 2023 report card reflects the 2021-22 school year).

^S For more information on the classification of absences as *excused* or *unexcused* and Tennessee's truancy intervention laws, see OREA's 2021 report *Student Attendance in Tennessee*.

Federal graduation rate requirements do not allow exceptions

Incarcerated students, students whose enrollment is difficult to determine, and students who permanently withdraw from school because they are severely ill or incapacitated can negatively affect district and school graduation and dropout rates. Federal graduation rate requirements do not allow flexibility for such cases.

Incarcerated students

Criminal behavior by students, especially when it occurs outside of school hours, cannot be controlled by district and school officials. The incarceration of students as a result of their behavior can negatively affect district and school graduation and dropout rates, however. When the incarceration occurs, its duration, and the facility where a student is placed are factors in whether a district and school's graduation and dropout rates are negatively affected. Students who are incarcerated well before their anticipated high school graduation date may miss a significant amount of school, fall behind on accumulating the necessary credits, and not graduate on time.

According to ESSA, when a student leaves high school to enter a prison or juvenile facility, the student may only be considered a transfer – and removed from a cohort of the district and school they attended before incarceration – *after* an adjudication of delinquency. Students held in custody pending a court date remain in the district and school cohort. If the student's cohort graduates while the student is awaiting adjudication and the student has not met state graduation requirements, this negatively affects the district and school graduation rate. The data for determining how often such cases occur is unavailable.

Upon adjudication, an incarcerated student can be transferred out of a cohort of the district and school they previously attended. But this is only allowed by federal guidelines if the student is placed in a correctional facility with a certain type of education program. The facility's education program must be one from which the student is expected to graduate with a regular high school diploma or receive a state-defined alternative diploma, (e.g., the alternate academic diploma in Tennessee. See page 5 for more information.).^T Students placed in these facilities are transferred out of the cohort of their home district and school cohort and added to the cohort of the facility. As of July 2023, there were eight such facilities in Tennessee, all of which are DCS-licensed facilities serving adjudicated youth.^U These facilities employ certified special education and general education teachers, and youth placed there may work towards a high school diploma or HiSET.

Students who are tried and convicted as adults, however, negatively affect their home district and school's graduation rate and may also negatively affect the dropout rate. This is because adult correctional facilities do not provide education services allowing inmates to obtain a regular high school diploma. Students incarcerated in these facilities who do not already possess the needed credits for high school graduation remain in their home district and school's cohort and negatively affect the graduation rate. Twelve students in the statewide cohort students who graduated in 2022 were placed in a facility without an educational program that offers a high school diploma and counted as dropouts for their home districts.

Some students placed in a facility without an educational program that offers a high school diploma may not have a negative effect on the dropout rate of their home district and school, however. Adult correctional facilities provide education services for individuals seeking to pass the HiSET exam. Students who pass the HiSET by the end of summer after their cohort graduates from high school do not count against the dropout rate of their home district and school.

^T TCA 49-6-3023 requires TDOE to promulgate rules for the education of incarcerated students. The rules must include procedures for funding, transferring educational records, and providing instruction to incarcerated students for a minimum of four hours each instructional day. All requirements under the Individuals with Disabilities Education Act (IDEA) apply to qualified students who are in a juvenile or adult correctional facility.

^U DCS-licensed facilities include hardware secure facilities (i.e., youth receive all services in-house and are not allowed to exit or enter at will) and staff secure facilities (i.e., youth receive treatment and education in-house, but medical and dental treatment can be completed off campus). For a list of facilities, see Appendix B.

Lack of enrollment confirmation for transfer students

Confirmation of a student's enrollment status determines whether the student will have a positive or negative effect on graduation and dropout rates. The enrollment status of some students can be difficult to determine, particularly in the case of students who transfer out of a district. Under federal law, if a school or district cannot obtain official written documentation that a student has transferred out, the student cannot be removed from a cohort and will negatively affect the district and school's graduation rate. USDOE guidance acknowledges confirmation of student status can be difficult in some cases but considers confirmation to be imperative in order to maintain data integrity.

For example, a student's family may inform the Tennessee school their child currently attends that they intend to move out of state and provide the name and location of the new school. In order to remove the student from the cohort at the Tennessee school, officials must obtain documentation from the school in the other state to confirm the student enrolled there. If the student did not enroll at the school the family specified, officials at the student's Tennessee school may have challenges in obtaining documentation that would meet the federal requirements for withdrawing the student from the cohort. Federal guidance is clear that, however challenging obtaining written documentation may be, the student may not be removed from the cohort in Tennessee without documentation of the student's status. If documentation cannot be obtained, the student remains in the cohort in Tennessee and will negatively affect the graduation rate for the district and school they attended before moving out of state.

Permanent medical withdrawals

Federal requirements also do not allow flexibility for permanent medical withdrawals. Students who are severely ill or incapacitated (in the opinion of a physician licensed by the State Board of Medical Examiners) to the point that no return to school is anticipated are permanently withdrawn. Based on federal guidelines, such students are counted as dropouts and negatively affect the graduation rate of their school and district.

There were fewer than 10 students statewide coded as permanent medical withdrawals during the 2021-22 school year.

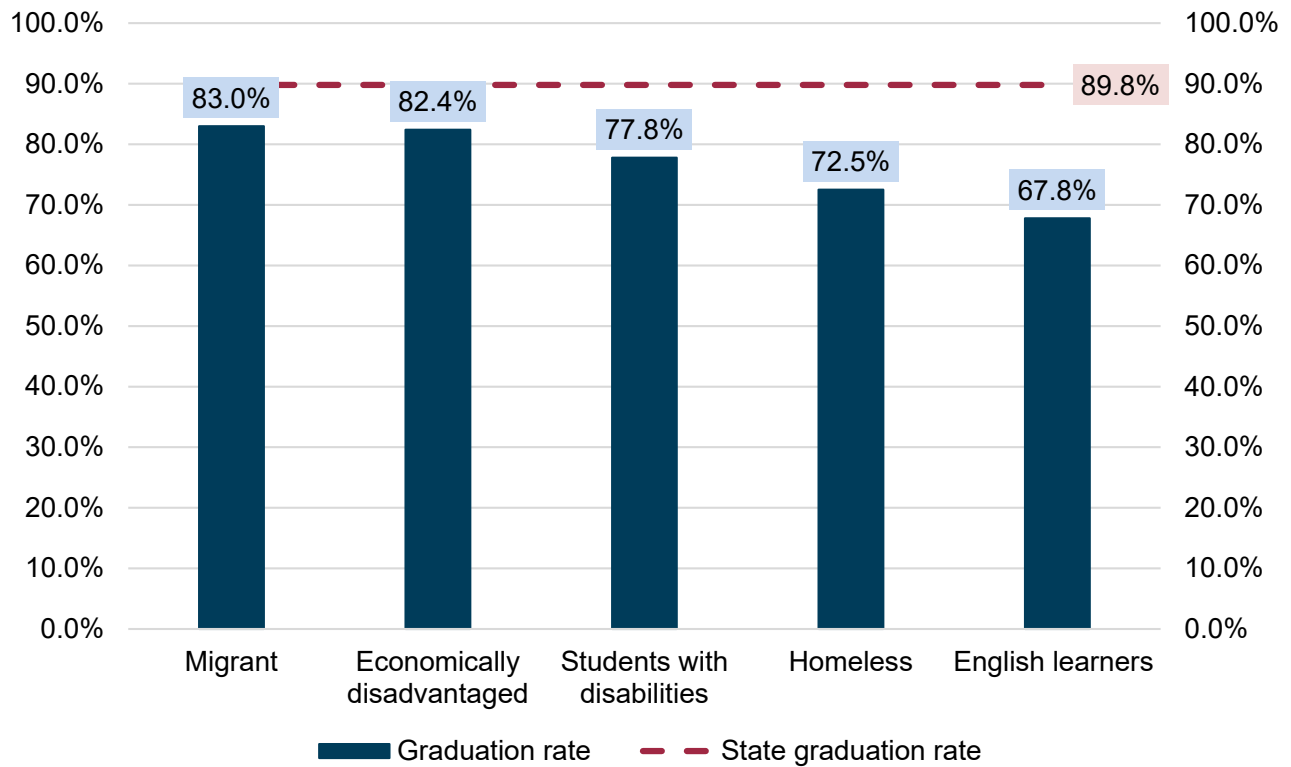
According to state guidelines, students with a temporary medical condition should be kept enrolled and treated as homebound students.

English learners and other student subgroups drop out at higher rates and graduate at lower rates than their peers

Certain student subgroups are more likely to drop out and not graduate from high school because of multiple factors. Some economically disadvantaged students may drop out to work full time to provide their family with financial support, for example. English learners, especially older students, may need additional time to learn English and may not graduate on time as a result.

In 2021-22, English learners in Tennessee had an ACGR of 67.8 percent, 22 percentage points below the state rate of 89.8 percent. Other student subgroups, including homeless students and students with disabilities, were also below the state rate.

Exhibit 13: Graduation rates for certain student subgroups were below the overall state rate for Tennessee in 2021-22

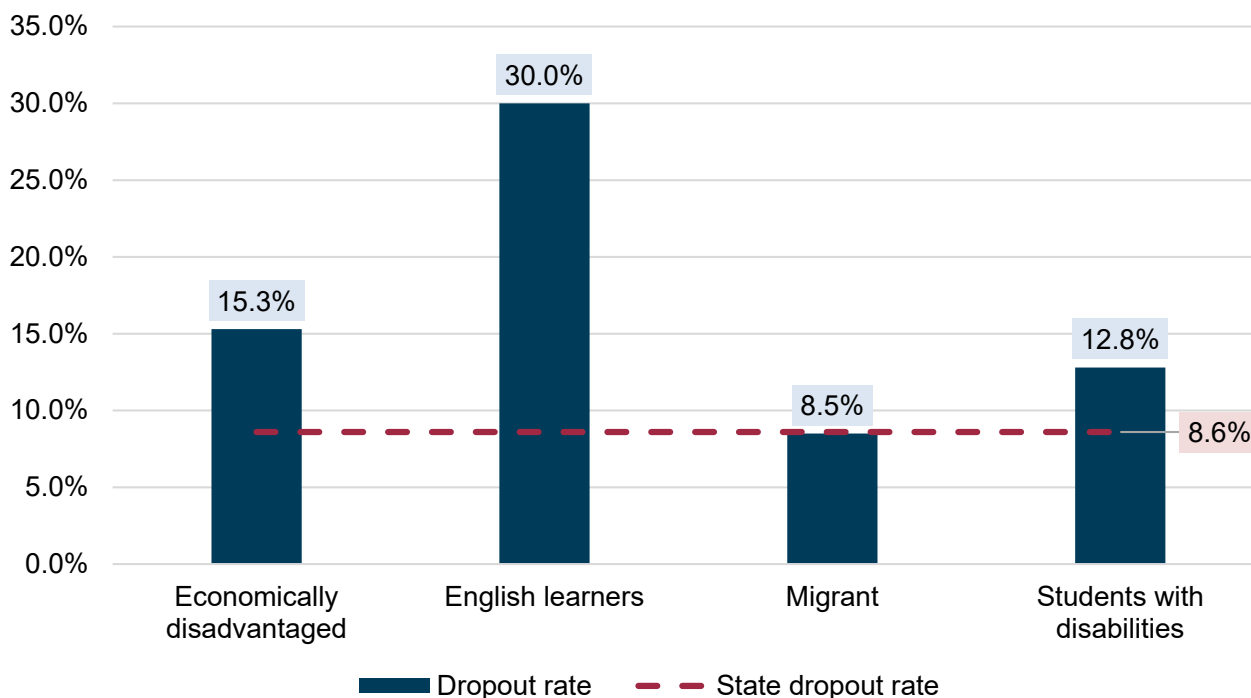


	Total in graduation cohort	Total graduates	Graduation rate
All students	71,887	64,580	89.8%
Migrant	47	39	83.0%
Economically disadvantaged	27,072	22,302	82.4%
Students with disabilities	8,934	6,951	77.8%
Homeless	2,534	1,837	72.5%
English learners	3,660	2,482	67.8%

Source: Tennessee Department of Education.

In conjunction with having the lowest ACGR, English learners had the highest dropout rate in the state in 2021-22, with a rate of 30 percent. The dropout rate for economically disadvantaged students was 15.3 percent that year, while students with disabilities had a 12.8 percent dropout rate. At 8.5 percent, migrant students were slightly below the state dropout rate of 8.6 percent.

Exhibit 14: English learners had the highest dropout rate for 2021-22



	Total in graduation cohort	Total dropouts	Dropout rate
All students	71,887	6,191	8.6%
Migrant	*	*	8.5%
Economically disadvantaged	27,072	4,153	15.3%
Students with disabilities	8,934	1,147	12.8%
English learners	3,660	1,098	30.0%

Note: * The precise number has been withheld to protect student privacy in accordance with TDOE’s suppression policy.
 Source: Tennessee Department of Education.

Out of 127 Tennessee districts with graduating cohorts (i.e., districts that serve students through 12th grade), 30 districts identified English language learners as having the highest dropout rate of all student subgroups. Twenty-eight districts identified economically disadvantaged students as having the highest rate, while 21 districts identified students with disabilities as having the highest dropout rate.

Dropout rates for student subgroups (i.e., economically disadvantaged, English learners, migrant students, and students with disabilities) were also analyzed in Tennessee’s largest districts.^v The student subgroup with the highest dropout rate was identified and included in Exhibit 15.

^v The Achievement School District is included in this analysis because all of its 26 schools are located in the state’s largest school districts – Davidson County and Memphis-Shelby County.

Exhibit 15: In Tennessee’s largest school districts, English learners were the student group most likely to have the highest dropout rate in 2021-22

Large or urban district name	Student subgroup with highest dropout rate	Subgroup dropout rate	Dropout rate of all students in the district
Davidson County	English learners	37.7%	16.2%
Hamilton County	English learners	36.2%	9.3%
Knox County	English learners	32.2%	8.0%
Rutherford County	English learners	10.1%	4.0%
Memphis-Shelby County	English learners	35.4%	18.1%
Achievement School District	English learners	41.7%	42.9%

Note: Davidson County’s highest dropout rate was calculated from a subgroup of fewer than 10 students. That data is suppressed, and the second highest rate was included in the table.

Source: Tennessee Department of Education.

Higher dropout rates among English learner students (including students whose home languages are Spanish, Arabic, and Kurdish, among others) have been identified in Tennessee as well as nationally.

A 2017 USDOE report points to the variation within the English learner population. The report found that standard warning indicators were unable to accurately identify many future dropouts among newcomer English learner students (i.e., those who have enrolled in a United States school in the previous three years and are still classified as an English learner student).^{13,w} Newcomer English learners are one type of English learner student. The report points to variation within the English learner population. For example, some English learners were born in the United States, some are new immigrants, and others are refugees. These English learner students differ in their prior exposure to English, and, for those from other countries, in the amount of formal schooling they received in their native language prior to their arrival in the United States.

The report found notable differences among subgroups of English learner students in graduation and dropout rates. Four-year graduation rates for newcomer English learner students were 33.8 percentage points lower than long-term proficient English learner students (i.e., English learner students who reached proficiency in or before 6th grade). Dropout rates were 5.8 percentage points higher. One of the report’s conclusions is that efforts to reduce the dropout rate should take into account differences within the English learner student population. The report suggests that, currently, national data does not capture the variation in dropout and graduation rates for different types of English learner students, but examining data for subgroups for English learner students may be helpful in identifying particular areas of support.

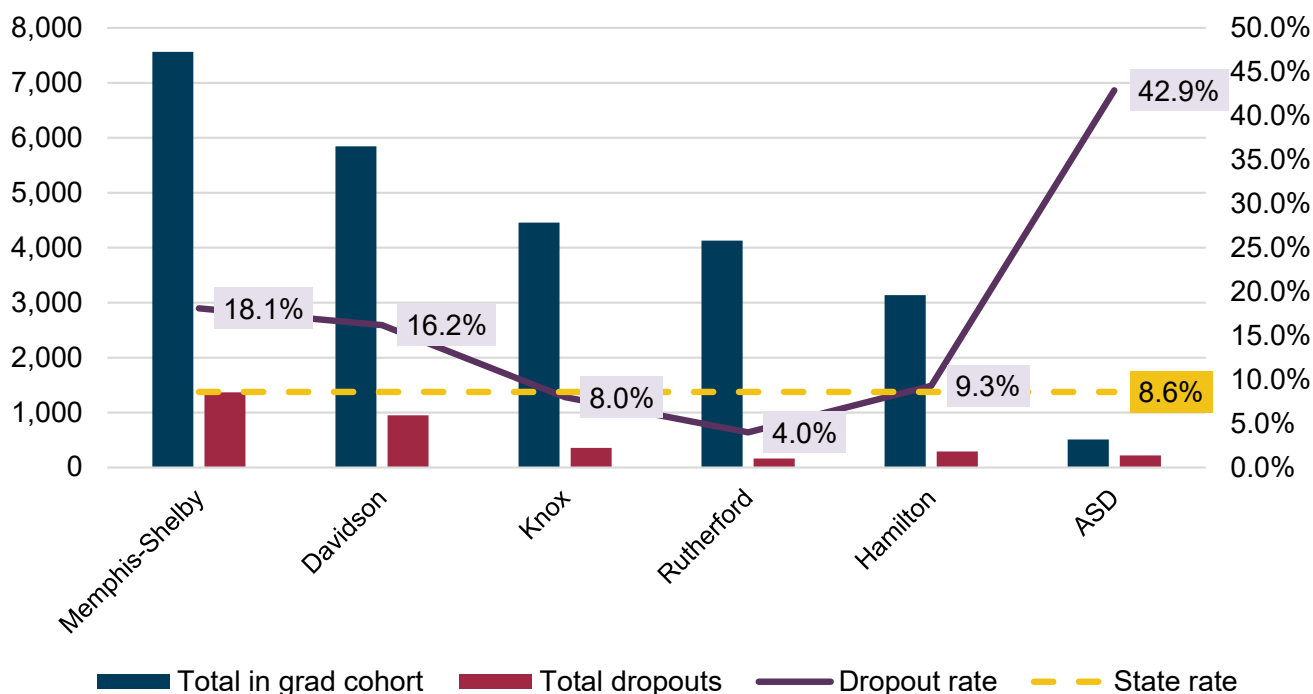
A 2019 report on four-year graduation rates for English learners found that, when states opted to publish extended-year graduation rates, English learner student graduation rates increased when a fifth and sixth year were taken into consideration, as compared to more modest increases in the rate for the overall student population.¹⁴ Across 23 states that published extended-year graduation rates, the increase from the four-year to the five-year rate ranged from 1 percent to 6 percent for all students and from 1 percent to 13 percent for English learner students.

^wThe USDOE report defines newcomer English students as recent immigrants who first entered a school in grades 7, 8, or 9 and were still classified as current English learner students in grade 9. The report also defines early warning indicators as some combination of attendance, course failures, grade point average, and suspensions or expulsions used to identify and provide support for students at risk of dropping out.

Most of Tennessee’s largest districts have dropout rates *above* and graduation rates *below* the state rate

Four of the six largest school districts in Tennessee had dropout rates above the overall state average of 8.6 percent for the 2021-22 school year.^x The Achievement School District had the highest dropout rate that year at 42.9 percent, followed by Memphis-Shelby County (18.1 percent) and Davidson County (16.2 percent). Hamilton County’s dropout rate was 9.3 percent. Knox County reported a rate of 8 percent, while Rutherford County’s rate was 4 percent.

Exhibit 16: All but two of Tennessee’s six largest districts had a dropout rate above the state rate in 2021-22

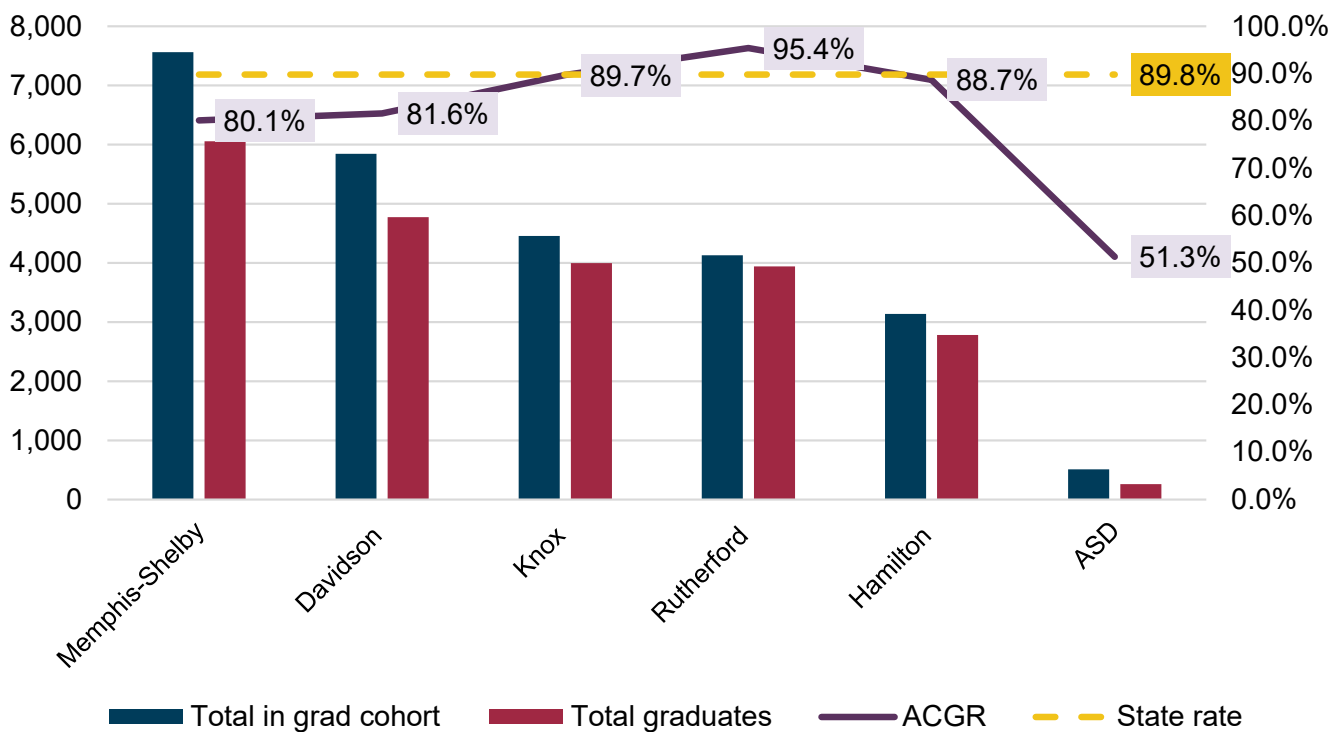


Source: Tennessee Department of Education.

Five of Tennessee’s six largest school districts had graduation rates below the state rate in the 2021-22 school year. At 51.3 percent, the Achievement School District had the lowest graduation rate of the six districts. The graduation rate for Memphis-Shelby County was 80.1 percent, while the rate for Davidson County was 81.6 percent. Hamilton County, at 88.7 percent, was closer to the state rate, and there was a 0.1 percentage point difference between the state rate and Knox County’s rate. Rutherford County’s graduation rate (95.4 percent) exceeded the state rate.

^xThe Achievement School District is included in this analysis because all of its 26 schools are located in the state’s largest school districts – Davidson County and Memphis-Shelby County.

Exhibit 17: Graduation rates for Tennessee’s six largest school districts | 2021-22



Source: Tennessee Department of Education.

Policy consideration

TDOE could publish an extended-year graduation rate in addition to its four-year graduation rate.

Under ESSA, states have the option to publish an extended-year ACGR in addition to a four-year ACGR. Over half of all states report a five-, six-, or seven-year ACGR to highlight the students who needed extra time to meet graduation requirements. While not required for federal accountability purposes, extended-year graduation rates show educators, parents, and policymakers which student subgroups’ graduation rates rise at the five-year mark and beyond. For example, in a study of six districts in Washington state in 2008-09, the five-year ACGR of English learners was 12.5 percentage points higher than the same group’s four-year ACGR.¹⁵ Other states have seen similar trends with English learners and other subgroups. The graduation rate for English learner students, students with disabilities, and economically disadvantaged students increased the most among all five-year graduates, according to a 2019 study by the Migration Policy Institute.¹⁶ The increase of English learner students to graduate in five years was greater than any other student subgroup in 14 of 23 states reporting extended-year graduation rates. The addition of a six-year graduation rate increased the graduation rate for English learner students between 1 and 4 percent; the increase for all graduating students was no more than 2 percent.

Additionally, extended-year ACGRs may help educators identify areas of support for those student groups to more fully develop college- and career-ready language and academic skills.

Appendix A: USDOE answers to questions about federal requirements for calculating graduation rates

Question	USDOE Answer
<p>May a general equivalency diploma, alternative diploma, certificate of attendance, or diploma based on meeting IEP goals be counted as a regular high school diploma?</p>	<p>No. A state may not include a recognized equivalent of a diploma as a regular high school diploma for the purpose of calculating the four-year or extended-year ACGR. Thus, students who graduate with a credential other than a regular high school diploma, such as a general equivalency diploma, modified diploma, certificate of completion, certificate of attendance, or a diploma based on meeting a student's IEP goals, may not be counted in the number as having earned a regular high school diploma, but must be included in the denominator of the four-year and extended-year ACGR.</p>
<p>When may a school or LEA remove a student from a cohort?</p>	<p>Only a student who transfers out and enrolls in another high school or in an educational program (including a program in a prison or juvenile facility) from which the student is expected to receive a high school diploma or state-defined alternate diploma that meets the necessary requirements, emigrates to another country, or dies may be removed from a high school's or LEA's cohort.</p> <p>Before removing a student from a cohort, a school or LEA must obtain confirmation in writing that the student transferred out, emigrated, transferred to a prison or juvenile facility, or died. A student may not be removed from the cohort for any other reason. Thus, a state must ensure that its LEAs and schools ensure that a student who drops out of high school is not deemed a transfer for purposes of calculating the ACGR; rather, the student must remain in the adjusted cohort – that is, the denominator of the graduation rate calculation.</p>
<p>When a student transfers into a high school, to which cohort should a school or LEA assign the student?</p>	<p>A student who transfers into a high school must be assigned to the cohort in which the student started grade 9 for the first time.</p> <p>If a student who has repeated a grade transfers into a high school, the student must be assigned to the cohort in which the student started grade 9 for the first time. Unless the student skipped a grade later in high school or caught up with the original cohort in some other manner, that student could not graduate within four years of starting grade 9.</p>
<p>May a school or LEA consider a student to be a transfer if the student leaves a public high school to enter a prison or juvenile facility?</p>	<p>A student who leaves high school to enter a prison or juvenile facility may be considered a transfer only after an adjudication of delinquency and if the student is in a prison or juvenile facility that has a school (as defined under state law) or provides an educational program from which the student is expected to receive a regular high school diploma or state-defined alternate diploma that meets the necessary requirements during the period in which the student is assigned to the prison or juvenile facility. If the facility does not have a school or educational program or provides an educational program that does not offer a regular high school diploma, the student may not be considered a transfer, may not be removed from the cohort, and must remain in the denominator of graduation rate calculation for the school, LEA, and state in which the student last attended high school.</p>
<p>How must a school or LEA treat a student who has been detained and is awaiting adjudication?</p>	<p>A student who is in a prison or juvenile facility awaiting a hearing or release and not yet adjudicated as delinquent may not be removed from the cohort of the sending school or LEA. If a student's cohort graduates while the student is awaiting adjudication, and the student has not met the graduation requirements for the state, the student must remain in the cohort of the sending school and cannot be counted as a graduate.</p>

Question	USDOE Answer
<p>What documentation is required to confirm that a student has transferred out – i.e., transferred to another high school or to an educational program from which the student is expected to receive a regular high school diploma or state-defined alternate diploma?</p>	<p>In the case of a student who moves to another public school within the state, the transfer would most likely be officially documented and recorded in the state’s data system; thus, a record from the state’s data system would be considered official written documentation.</p> <p>Other examples of official written documentation include: a request for student records from a receiving public or private high school or educational program (that offers a regular high school diploma or alternate diploma that meets necessary requirements); or a written record of a response from an official in the receiving school or program acknowledging the student’s enrollment.</p> <p>With respect to a home-schooled student, official written documentation may include, for example, a letter of withdrawal or other written confirmation from a parent or guardian; any documentation that meets the homeschool notification or compulsory attendance requirements in the state; or any other written documentation accepted in the state to verify a child is homeschooled. A conversation with a parent or neighbor of a student, for instance, would not be considered written documentation of a transfer.</p>
<p>What documentation is required to confirm that a student has emigrated to another country?</p>	<p>A school or LEA must have written confirmation that a student has emigrated to another country but need not obtain official written documentation. For example, if a parent informs a school administrator that the family is leaving the country, the school administrator may document this conversation in writing and include it in the student’s file. The regulations do not require written documentation to be “official” due to difficulty of obtaining transcripts or other official documentation from another country.</p>
<p>If, after multiple attempts, an LEA cannot obtain official written documentation that a student has transferred out, may the LEA remove the student from the cohort?</p>	<p>No. Although in some cases it may be difficult for an LEA to obtain official written documentation of a student’s transfer, the student may not be removed from the cohort simply because the student’s status cannot be documented.</p>

Source: USDOE, *Every Student Succeeds Act High School Graduation Rate Non-Regulatory Guidance*, January 2017.

Appendix B: DCS-licensed facilities for incarcerated students

Hardware secure	Staff secure
Wilder Youth Development Center	Memphis Youth Academy
Mt. View (hardware secure)	Rosewood Academy
Hollis Treatment Center	Walnut Academy
	Standing Tall Music City
	Mt. View (staff secure)

Source: Tennessee Department of Children's Services.

Endnotes

¹ “Every Student Succeeds Act,” *U.S. Code 20* (2015), 6301 et seq.

² Kim Potts, *On the Horizon: Calculating and Reporting High School Graduation Rates*, Tennessee Comptroller’s Office of Research and Education Accountability, April 2009.

³ U.S. Department of Education, *Every Student Succeeds Act High School Graduation Rate Non-Regulatory Guidance*, January 2017.

⁴ State Board of Education, Chapter 0520-01-03-.11, repealed February 23, 2021; Public Chapter 652 (2020).

⁵ Douglas N. Harris and Feng Chan, *How has the pandemic affected high school graduation and college entry?*, Brookings Institution, May 10, 2022.

⁶ National Center for Education Statistics, *The Condition of Education 2023*, Public High School Graduation Rates, U.S. Department of Education, Institute of Education Sciences, <https://nces.ed.gov/programs/coe/indicator/coi>.

⁷ Tennessee Department of Education, 2022-23 Graduation Cohort Protocol, December 2022.

⁸ Tennessee Department of Education, EIS Appendices, October 2022.

⁹ U.S. Department of Education, *Tennessee Consolidated Performance Review Report*, November 2021.

¹⁰ Tennessee Department of Education, *2021 & 2022 Graduating Cohorts Appeals Guide: Additional Verification Process for Federal Graduation Rate Reporting*, March 3, 2023.

¹¹ State Board of Education, High School Policy 2.103, revised August 4, 2023.

¹² Tennessee Department of Education, *TDOE Attendance Manual*, updated 2021.

¹³ Theresa Deussen, Havalá Hanson, and Biraj Bisht, *Are two commonly used early warning indicators accurate predictors of dropout for English learner students? Evidence from six districts in Washington state*, National Center for Education Evaluation and Regional Assistance, U.S. Department of Education, March 2017.

¹⁴ Julie Sugarman, *The Unintended Consequences for English Learners of Using the Four-Year Graduation Rate for School Accountability*, Migration Policy Institute, April 2019.

¹⁵ Ibid.

¹⁶ Ibid.

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