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High School Graduation Rate

Non-Regulatory Guidance



December 22, 2008

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ATTACHMENTS

Attachment A: Four-year adjusted cohort graduation rate for the first time 9th grade cohort of 2008-09.

Attachment B: Five-year adjusted cohort graduation rate for the first time 9th grade cohort of 2007-2008.

The U.S. Department of Education (Department) issues this guidance to provide States, local educational agencies (LEAs), and schools with information regarding implementation of the requirements in the Title I graduation rate regulations issued on October 29, 2008.

This guidance represents the Department’s current thinking on this topic. It does not create or confer any rights for or on any person. This guidance does not impose any requirements beyond those contained in applicable law and regulations.

If you are interested in commenting on this guidance, please e-mail us your comments at oeese@ed.gov or write to us at the following address:

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Introduction

Establishing a uniform and accurate measure of the high school graduation rate that is comparable across States is a critical step toward improving high school accountability. An adjusted cohort graduation rate will improve our understanding of the characteristics of the population of students who do not earn regular high school diplomas or who take longer than four years to graduate. Numerous reports and statistics from the U.S. Department of Labor indicate the importance of a high school diploma. For example, in 2006, the unemployment rate for high school dropouts aged 25 and older was more than 1.5 times the rate of individuals who had a high school diploma (6.8 percent compared to 4.3 percent, respectively). Data for the same year also show that median annual earnings for high school graduates were \$29,000, or nearly 32 percent higher than the \$22,000 earned by those who did not receive a high school diploma.¹ These data make very clear the high economic costs of not completing high school.

In August 2004, the National Center for Education Statistics (NCES) released a report synthesizing the recommendations of a panel of experts on graduation rate calculations. The panel recommended an adjusted cohort graduation rate as the best method for calculating the graduation rate.² In 2005, the National Governors Association (NGA) Task Force on High School Graduation Rate Data published its report. The lead recommendation was for all States to adopt and begin immediately taking steps to implement a standard four-year adjusted cohort graduation rate consistent with that proposed by the NCES panel.³

On October 29, 2008, the Department published final regulations amending the existing regulations implementing Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the No Child Left Behind Act of 2001 (NCLB).⁴ The amendments included changes to 34 C.F.R. §200.19, regarding the “other academic indicators” that States use in defining “adequate yearly progress” (AYP). Those amendments to 34 C.F.R. §200.19 included new requirements for calculating graduation rate, which is the other academic indicator for high school. Throughout this guidance, these final regulations are referred to as the “2008 Title I regulations.”

The 2008 Title I regulations require States and local educational agencies (LEAs) to report on their annual report cards a four-year adjusted cohort graduation rate, disaggregated by subgroups, at the school, LEA, and State levels, respectively. This requirement is to be implemented beginning with the report cards, required by section 1111(h) of ESEA, that include information from State assessments administered during the 2010-2011 school year. Further, States must use that rate, disaggregated by subgroups, in making AYP determinations for schools, LEAs, and the

¹U.S. Department of Education. (2008). Condition of Education 2008. Washington, DC: Author

²National Institute of Statistical Sciences and Education Statistics Services Institute. (2004). National Institute of Statistical Sciences/Education Statistics Services Institute Task Force on Graduation, Completion, and Dropout Indicators (NCES 2005-105). U.S. Department of Education. Washington, DC: National Center for Education Statistics.

³National Governors Association. (2005). Graduation Counts: A Report of the National Governors Association Task Force on High School Graduation Rate Data. Washington, DC: Author.

⁴<http://www.ed.gov/legislation/FedRegister/finrule/2008-4/102908a.html>

State beginning with the determinations that are based on 2011-2012 assessment results.⁵ Prior to the 2010-2011 deadline, the regulations permit States to use a transitional graduation rate. In addition to calculating the four-year graduation rate, a State may apply to the Department for approval to use an extended-year adjusted cohort graduation rate as part of its AYP calculations. The 2008 Title I regulations also require each State to set a goal and targets for high school graduation and to incorporate the goal and targets into its AYP definition, beginning in 2009-2010.

This non-regulatory guidance provides States, LEAs, and schools with information about how to implement the provisions in 34 C.F.R. §200.19(b). Section A of this guidance defines the four-year adjusted cohort graduation rate, the extended-year adjusted cohort graduation rate, and the transitional graduation rates that are allowable until States must implement the four-year adjusted cohort graduation rate. Section B guides States in setting a single graduation rate goal and annual graduation rate targets. Section C outlines requirements for reporting graduation rate. Section D answers questions about how States include the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate in AYP determinations, including the use of disaggregated rates for student subgroups. Section E provides information about how a State must revise its Consolidated State Application Accountability Workbook (Accountability Workbook) to include certain information and submit its revisions to the Department for technical assistance and peer review. Section F clarifies the timeline for implementing the new graduation rate provisions, as well as the process for how a State that cannot meet the deadlines outlined in the final regulations may request, from the Secretary, an extension of time to meet the requirements.

SECTION A: DEFINITIONS

Four-year adjusted cohort graduation rate definition

A-1. What is a “four-year adjusted cohort graduation rate”?

As defined in 34 C.F.R. §200.19(b)(1)(i)-(iv), the four-year adjusted cohort graduation rate (hereafter referred to as “the four-year graduation rate”) is the number of students who graduate in four years with a regular high school diploma divided by the number of students who form the adjusted cohort for the graduating class. From the beginning of 9th grade, students who are entering that grade for the first time form a cohort that is subsequently “adjusted” by adding any students who transfer into the cohort later during the 9th grade and the next three years and subtracting any students who transfer out, emigrate to another country, or die during that same period. (See questions A-18 through A-32 for more information about adjusting a cohort.)

The final regulations specify that States’ AYP definition include a *four-year* graduation rate, consistent with the statutory requirement in section 1111(b)(2)(C)(vi) of the ESEA that graduation rate be defined as the percentage of students who graduate from secondary school with a regular diploma *in the standard number of years*, because more than 90 percent of schools

⁵ In order for a school or LEA to make AYP, it must meet or exceed the State’s other academic indicator(s) (in addition to meeting proficiency and assessment participation goals). Each State must use graduation rate as its other academic indicator at the high school level. (Section 1111(b)(2)(C)(vi) and 34 C.F.R. §200.19)

in the country with a 12th grade also have a 9th grade.⁶ If, however, the standard number of years in a high school is three (i.e., high schools with grades 10-12) or even two years (high schools with grades 11-12), the State would calculate an adjusted cohort graduation rate using the appropriate number of years for the school—e.g., a three-year or two-year adjusted cohort rate. For schools with a 12th grade that have more than four grades (e.g., schools with grades K-12 or 7-12), the four-year graduation rate is calculated in the same manner that it is calculated for high schools with only four grades, by taking the number of first-time 9th grade students who graduate in four years with a regular high school diploma divided by the number of students who form the adjusted cohort for the graduating class.

A-2. Is the four-year graduation rate identical to the graduation rate recommended by the National Governors Association Task Force (i.e., the “NGA rate”)?

The four-year graduation rate required by 34 C.F.R. §200.19(b)(1) is similar but not identical to the NGA rate. The NGA rate permits special education students and recent immigrant students with limited English proficiency (LEP) to be assigned to different cohorts to allow them more time to graduate, while the four-year graduation rate does not allow for such “cohort reassignment.” The NGA rate also permits students who graduate with modified high school diplomas to count as graduates, while the four-year graduation rate strictly adheres to section 1111(b)(2)(C)(vi) of the ESEA, which defines graduation rate as the “percentage of students who graduate from secondary school *with a regular diploma* in the standard number of years” (emphasis added). The legislative history accompanying this provision suggests that Congress intended a “regular diploma” to exclude an alternative degree that is not fully aligned with a State’s academic standards (e.g., a General Education Development (GED) credential, a modified diploma, and a certificate of attendance).

A-3. How is the four-year graduation rate calculated?

The four-year graduation rate is calculated by dividing the number of students who graduate in four years or less with a regular high school diploma by the number of students who form the adjusted cohort for that graduating class. (See question A-33 for the definition of a regular high school diploma and questions A-18 through A-32 for more information about adjusting a cohort.)

The following formula provides an example of the four-year graduation rate for the cohort entering 9th grade for the first time in the fall of the 2008-2009 school year and graduating by the end of the 2011-2012 school year. (See question A-6 for more information about the option to include summer graduates.)

⁶ U.S. Department of Education, National Center for Education Statistics, Common Core of Data (CCD), “Public Elementary/Secondary School Universe Survey,” 2005–06, Version 1a.

Number of cohort members who earned a regular high school diploma
by the end of the 2011- 2012 school year

Number of first-time 9th graders in fall 2008 (starting cohort) plus students who transfer in,
minus students who transfer out, emigrate, or die during school years 2008-2009, 2009-2010,
2010-2011, and 2011-2012

Appendix A provides an example of how a four-year cohort would be tracked from year-to-year
to calculate the four-year graduation rate.

**A-4. Why must States base the four-year graduation rate on “first-time in 9th grade”
cohorts?**

Cohort-based graduation rates are accurate only if each student is assigned to a single cohort.
For example, without a single cohort assignment, a student who repeated 9th grade might be
included in two separate cohorts of 9th graders—the class in which the student originally started
9th grade and the class in which the student was assigned for his or her second year of 9th grade.
Unless the student skipped a grade later in high school or caught up with the original cohort in
some other manner, that student would not graduate within four years of starting 9th grade.
Therefore, to ensure an accurate measure of a four-year graduation rate, the cohort must be based
only on students who are first-time 9th graders.

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

Yes. The four-year graduation rate counts a student who graduates with a regular high school
diploma in four years or less as a high school graduate in his or her original cohort—that is, the
cohort with which he or she started 9th grade. For example, a student who enters the 9th grade
for the first time in the 2011-2012 school year and graduates in three years would be included in
the cohort of students expected to graduate in the 2014-2015 school year, even though that
student would receive his or her diploma in the 2013-2014 school year. The student may be
included only in the graduation rate calculated for the cohort of students who started 9th grade in
2011-2012; effectively, the student’s graduation information is “banked” for a year until his or
her cohort graduates in 2014-2015. Thus, the numerator in the graduation rate calculation
includes only *members of the cohort* that graduate in a particular year, not other students who
may also graduate that year.

**A-6. May the four-year graduation rate include students who graduate in the summer
after their fourth year of high school?**

A State may, but is not required to, include students who graduate in the summer after their
fourth year of high school among the cohort members who graduate in four years. However, the
inclusion of such students in the four-year graduation rate may not delay annual AYP
determinations. In order not to delay those determinations, a State that includes summer school
graduates typically “lags” graduation rates for AYP determinations. For example, such a State
would announce AYP determinations for the 2011-2012 school year prior to the start of the

2012-2013 school year using assessment results from the 2011-2012 school year and the graduation rate from the 2010-2011 school year (which includes students who graduated in summer 2011). Lagging graduation rate in this manner may provide a State with a more complete picture of the on-time graduation rate, while also allowing additional time to review and ensure the accuracy of graduation rate data without delaying annual AYP determinations. See question D-3 for information about how lagged graduation rate data factor into the timeline for implementing the graduation rate provisions.

The following formula provides an example of the four-year graduation rate for the cohort entering 9th grade for the first time in the fall of the 2007-2008 school year and graduating by the end of summer 2011.

Number of cohort members who earned a regular high school diploma
through summer 2011

Number of first-time 9th graders in fall 2007 (starting cohort) plus students who transfer in,
minus students who transfer out, emigrate, or die during school years 2007-2008, 2008-2009,
2009-2010, 2010-2011, and through summer 2011

A-7. How is an adjusted cohort graduation rate calculated for a high school that does not have each of grades 9-12?

The graduation rate is calculated only for the grades included in a high school. For example, if a high school only has grades 10-12, the State would use a three-year adjusted cohort graduation rate that would include only grades 10-12. The adjusted cohort would consist of first-time 10th graders in a given year at the school plus any students who transfer into the cohort during the next three years, minus any students who transfer out, emigrate to another country, or die during the three years. The three-year adjusted cohort graduation rate would be calculated by dividing the number of students who receive a regular high school diploma in three years or less by the adjusted cohort. As noted in question A-1, the final regulations specify that States use a *four-year* graduation rate, consistent with the statutory requirement in section 1111(b)(2)(C)(vi) of the ESEA that graduation rate is to be defined as the percentage of students who graduate from secondary school with a regular diploma *in the standard number of years*, because more than 90 percent of schools with a 12th grade in the country also have a 9th grade; therefore, the standard number of years is four years after starting the 9th grade.⁷

A-8. How is the four-year graduation rate calculated for an LEA or State that has high schools with varying grade configurations?

There may be more than one way to calculate the four-year graduation rate for an LEA or State that has high schools with varying grade configurations (e.g., some high schools with grades 9-12, others with grades 10-12). The Department believes that, unless an LEA does not serve students in grade 9, the four-year graduation rate for an LEA should be calculated based on the

⁷ Id.

number of first time 9th graders enrolled in a given year across all the schools in that LEA. This approach would maximize comparability of on-time graduation rates among LEAs and States with schools with different grade configurations and hold LEAs and States accountable for students who earn a regular high school diploma within four years of starting 9th grade, irrespective of the number of grades in the high school they attend. Similarly, the four-year graduation rate for a State should be calculated based on the number of first time 9th graders enrolled in a given year across all the schools in the State.

A-9. If a student drops out before entering 9th grade, is the student included in the four-year graduation rate?

No. In order to be included in the four-year graduation rate at the school level, a student must be enrolled as a first-time 9th grader. Similarly, in a high school with grades 10-12, a student must be enrolled as a first-time 10th grader to be included in the adjusted cohort graduation rate at the school level. (As noted in question A-8, the four-year graduation rate for an LEA should be calculated based upon the number of first time 9th graders enrolled in a given year across all the schools in the LEA, irrespective of the number of grades in the high school they attend.) However, States are encouraged to hold all schools accountable for students who drop out, for example, by including, as an additional academic indicator, a measure of on-time promotion.

A-10. If a student changes subgroup membership by the end of high school, how would that student be counted in the four-year graduation rate?

In some cases, a student who is part of one subgroup as a 9th grader may no longer be part of that subgroup as a 12th grader (e.g., a student might be LEP upon entering high school, but designated proficient in English by the end of high school). States are responsible for developing clear and consistent rules for how to count such students in the four-year graduation rate. Some States count students in the subgroups in which they were members in 9th grade, while others count students in the subgroups in which they were members in 12th grade. Each State should have “business rules” for how such students are to be counted that are applied consistently throughout the State, and consistently across grade spans (i.e., elementary, middle, and high school).

A-11. How is a student who graduates in more than four years counted in the four-year graduation rate?

A student who graduates in more than four years is counted as a non-graduate in the four-year graduation rate. Such a student must be included in the denominator of the four-year graduation rate and may not be included in the numerator because the student did not graduate in four years or less with a regular high school diploma. The student may not be removed from the cohort or assigned to a different cohort when calculating the four-year graduation rate. However, as explained in question A-13, such a student may be counted as a graduate in an extended-year graduation rate in a State that chooses to use such a graduation rate.

A-12. How is a student with a disability who has an individualized education program (IEP) that includes a plan to complete graduation requirements in more than four years included in the four-year graduation rate?

Only students who graduate with a regular high school diploma in four years or less may be included in the numerator of the four-year graduation rate. Thus, a student who takes more than four years to graduate, regardless of the reason, must be included in the adjusted cohort for the four-year graduation rate (the denominator) but may not be counted as a graduate (the numerator) when calculating the four-year graduation rate. However, as explained in question A-13, a student with a disability who graduates with a regular high school diploma in more than four years may be included in an extended-year graduation rate in a State that chooses to use such a graduation rate.

A student with a disability who does not graduate with a regular high school diploma, but instead receives an alternative diploma, certificate of completion, or any other degree or certificate that is not fully aligned with a State’s academic content standards may not be counted as graduating in calculating either the four-year or extended-year graduation rate.

Extended-year adjusted cohort graduation rate definition

A-13. May a State include students who graduate in more than four years with a regular high school diploma in graduation rate calculations?

Yes. A State may use an “extended-year adjusted cohort graduation rate” (hereafter referred to as the “extended-year graduation rate”⁸) in AYP determinations, subject to approval by the Secretary, that takes into account students who graduate with a regular high school diploma in more than four years (34 C.F.R. §200.19(b)(1)(v)). The option to use an extended-year adjusted cohort graduation rate in AYP determinations allows a State to give schools and LEAs credit for successfully graduating students who take longer than four years to graduate high school with a regular high school diploma. A State may not have an extended-year graduation rate to account only for students in particular subgroups (e.g., only a five-year graduation rate for students with disabilities).

While the regulations do not limit the number of years a State may include in an extended-year graduation rate, a State requesting an extended-year rate of more than five years should justify, and support with data, why such an extended-year rate is needed. Any State interested in including an extended-year graduation rate in AYP determinations must amend its Accountability Workbook and submit it to the Secretary for peer review and approval. (See question E-2.)

A-14. What is an extended-year adjusted cohort graduation rate?

⁸ As noted in question A-15, a State may have one or more extended-year graduation rates, but for ease of reference, this guidance will use the term “extended-year graduation rate” rather than “extended-year graduation rate or rates.”

An extended-year adjusted cohort graduation rate is defined as the number of students who graduate in four years or more with a regular high school diploma divided by the number of students who form the adjusted cohort for the four-year graduation rate, provided that the adjustments add to the cohort all students who transfer into the cohort by the end of the year of graduation being considered and subtract students who transfer out, emigrate to another country, or are deceased by the end of that year (34 C.F.R. §200.19(b)(1)(v)). An extended-year graduation rate follows the same rules as the four-year graduation rate. The following formula shows an example of the calculation of a five-year adjusted cohort graduation rate based on the class entering 9th grade in fall 2007 and graduating five years later at the end of the 2011-2012 school year. (If a State chooses to lag its graduation data, as discussed in question A-6, this example would include students graduating during the summer of 2012.)

Numerator in the four-year adjusted cohort graduation rate plus the number of students from the cohort who earned a regular high school diploma by the end of the 2011-2012 school year

Denominator in the four-year adjusted cohort graduation rate plus students who transferred in during the 2011-2012 school year minus students who transferred out, emigrated, or died during the 2011-2012 school year

Appendix B provides an example of how a five-year cohort would be tracked from year to year to calculate an extended-year graduation rate.

A-15. May a State have multiple extended-year graduation rates?

Yes. A State may have more than one extended-year graduation rate to separately account for students who graduate in different numbers of years (e.g., a five-year and a six-year graduation rate).

A-16. Must a State use an extended-year graduation rate?

No. The use of an extended-year graduation rate is voluntary. However, if a State chooses to use an extended-year graduation rate, the State and its LEAs must report, beginning with the first year for which the State calculates such a rate, the extended-year graduation rate separately from the four-year graduation rate (34 C.F.R. §200.19(b)(4)(ii)(B)).

A-17. If a State uses an extended-year graduation rate, must it use the rate consistently across the State for reporting and AYP determinations?

Yes. A State's four-year graduation rate and any extended-year graduation rate it elects to use must be clearly defined and calculated consistently across all high schools, and LEAs in the State for purposes of both reporting and making AYP determinations. A State may choose to calculate a graduation rate that differs from the requirements in 34 C.F.R. §200.19(b) for other local and State purposes, but only the four-year graduation rate and any extended-year graduation rate

approved by the Secretary as defined in 34 C.F.R. §200.19(b)(1) may be used to meet the Title I accountability requirements.

Adjusting a cohort

A-18. How is a cohort “adjusted”?

The four-year graduation rate follows a cohort, or a group of students, who begin as first-time 9th graders in a particular school year and who graduate with a regular high school diploma in four years or less. An extended-year graduation rate follows the same cohort of students for an additional year or years. The cohort is “adjusted” by adding any students transferring into the cohort and by subtracting any students who transfer out, emigrate to another country, or die during the years covered by the rate.

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

Only a student who transfers out and enrolls in another school or in an educational program that culminates in the award of a regular high school diploma, emigrates to another country, or dies may be removed from a high school’s or LEA’s cohort.⁹ Before removing a student from a cohort, a school or LEA must obtain confirmation in writing that the student transferred out, emigrated, or is deceased. No other students may be removed from the cohort. Thus, schools and LEAs must ensure that a student who drops out of high school is not deemed a transfer for purposes of calculating graduation rate; rather, the student must remain in the adjusted cohort—that is, the denominator of the graduation rate calculation. The 2008 Title I regulations do not require a State to track and report on the drop out rate, although data on drop outs is collected by the Department of Education independently of these requirements (see question C-7).

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

A *transfer into* a cohort occurs when a student enrolls after the beginning of the entering cohort’s first year in high school, up to and including in grade 12. A *transfer out* of a cohort occurs when a student leaves a school and enrolls in another school or in an educational program that culminates in the award of a regular high school diploma. A student who is retained in grade, enrolls in a GED program, or leaves school for any other reason may not be counted in the four-year or extended-year graduation rate as a transfer and must remain in the adjusted cohort (i.e., must be included in the denominator of the graduation rate for that cohort) (34 C.F.R. §200.19(b)(1)(ii)(B)(2)).

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

A student who transfers into a school should be assigned to the cohort in which the student started 9th grade for the first time. This information should be easily obtained for the vast majority of students who transfer into a school. A State’s longitudinal data system will provide

⁹ “Removing a student from his or her cohort” means removing the student from the denominator of the graduation rate equation.

this information for students who transfer between schools within the State. Schools and LEAs should make every effort to obtain this information for students who transfer from another State or another country.

If a student who has repeated a grade transfers into a school, the student should be assigned to the cohort in which the student started 9th grade for the first time. This assignment prevents the student from being included in two separate cohorts of 9th graders—the cohort in which the student originally started 9th grade and the cohort in which the student was assigned in the school to which he or she transferred. 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 9th grade.

A-22. If a student re-enrolls in a public high school after having dropped out of school for a period of time, how may a school or LEA count that student in the four-year or extended-year graduation rate?

The adjusted cohort graduation rate requires a State to have in place an accurate student record system that can track the progress of individual students over time. This system must record when a student has dropped out of school (and may not count him or her as a student who has transferred out). If, for example, a student who was a first-time 9th grader in 2008-2009 drops out in 2009-2010 after tenth grade, and then re-enrolls in high school in 2011-2012, that student may be deemed to have transferred into the receiving school and should be assigned to the cohort in which the student was a member when he or she started 9th grade for the first time (2008-2009). 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 9th grade, and therefore would count as a non-graduate in the four-year graduation rate. However, if the student graduates in more than four years, he or she may be counted as a graduate, in an extended-year graduation rate, if the State chooses to use one. As long as the student re-enrolls before the State determines the four-year graduation rate for that student's cohort, the student would no longer be recorded as a drop out and the student record system should be adjusted accordingly.

A-23. May a school or LEA consider a student to be a transfer if the student leaves a public high school and enrolls in a private school?

Yes. If a student leaves a public high school to enroll in a private school, that student would be considered to be a transfer out under 34 C.F.R. §200.19(b)(1)(ii)(B)(I). (See question A-27 regarding the official written documentation required to count a student as a transfer in calculating the four-year or extended-year graduation rate.)

A-24. May a school or LEA consider a student to be a transfer if the student leaves a public high school to be home schooled?

Yes. A student who leaves a public high school to be home schooled would be considered to be a transfer if the home school meets the State's requirements for compulsory attendance or other

State laws or policies applicable to home schools. See A-27 for examples of official written documentation needed to confirm that a student has transferred to a home school.

A-25. May a school or LEA consider a student to be a transfer if the student leaves a public high school and enrolls in another educational program?

A student who leaves a public high school and enrolls in another educational program may be considered a transfer only if that educational program culminates in the award of a regular high school diploma. For instance, if a student leaves a public high school because the student is placed in a juvenile detention center, the student would be a transfer if the center provides and the student participates in an educational program that culminates in the award of a regular high school diploma (as defined in 34 C.F.R. §200.19(b)(1)(iv)). Otherwise, the student may not be considered a transfer and must remain in the adjusted cohort for purposes of calculating the four-year and extended-year graduation rate.

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

It is critical for a school or LEA to have written confirmation that a student has transferred, emigrated to another country, or died before a student is removed from a cohort. Written documentation facilitates audits and, thus, will help ensure that States, LEAs, and schools have an accurate measure of graduation rate. Often LEAs and States have classified as a transfer a student who leaves a school for any reason, even if the student does not enroll in another school or in an educational program that culminates in the award of a regular high school diploma. Unless a school or LEA can confirm in writing that a student has transferred out, emigrated to another country, or is deceased, the school or LEA must consider that student to be in the adjusted cohort for purposes of calculating the four-year or extended-year graduation rate.

A-27. What documentation is required to confirm that a student has transferred out--i.e., transferred to another school or to an educational program that culminates in the award of a regular high school diploma?

To confirm that a student transferred out, a school or LEA must have “official written documentation” that a student has transferred to another school or to an educational program that culminates in the award of a regular high school diploma (34 C.F.R. §200.19(b)(1)(ii)(B)(I)). In the case of a student who moves to another public school within the State, that 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. Other examples of official written documentation include: a request for student records from a receiving public or private high school or an educational program (that culminates in a regular high school diploma); or a written record of a response from an official in the receiving school or program acknowledging the student’s enrollment. With respect to a home schooled student, official written documentation may include, for example, a letter of withdrawal or other written confirmation from the parent or guardian; any documentation that meets the home school notification or compulsory attendance requirements in the State; or any other written documentation accepted in the State to verify a child is home schooled. A conversation with a

parent or neighbor of a student, for instance, would not be considered official written documentation of a transfer.

A-28. What documentation is required to confirm that a student has emigrated to another country?

A school or LEA must have written confirmation that a student has emigrated to another country (34 C.F.R. §200.19(b)(1)(ii)(B)), 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" for a student who emigrates to another country because the Department recognizes that it may be difficult, if not impossible, to obtain transcripts or other official documentation from another country confirming that the student is enrolled in school.

A-29. What documentation is required to confirm that a student is deceased?

A school or LEA must have written confirmation that a student is deceased before removing the student from the cohort (34 C.F.R. §200.19(b)(1)(ii)(B)). A letter from a parent or an obituary is sufficient documentation. Official written documentation of a student's death, such as a death certificate, is not necessary.

A-30. How can an LEA document the transfer of a migrant student?

The Department's Migrant Student Information Exchange system includes information on migrant students that can be accessed by all States and LEAs to help ensure that the academic records of these highly mobile students are preserved during their frequent moves. This system should be of great assistance to States in documenting the enrollment of migratory students, as defined in section 1309 of the ESEA, in another school or in an educational program that culminates in the award of a regular high school diploma.

A-31. Is a student who leaves school because the student is incarcerated considered a transfer?

An incarcerated student may be considered a transfer only if the prison or juvenile facility to which the student is confined has a school (as defined under State law) or provides an educational program that culminates in the award of a regular high school diploma. If the facility does not have a school or educational program, or provides an educational program that does not culminate in the award of 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 the graduation rate calculation for the school, LEA, and State in which the student last attended high school.

A-32. 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?

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. Removing a student from the cohort whose status cannot be documented could produce an inaccurate graduation rate if that student dropped out of school rather than transferred. It is critical that an LEA carefully document student transfers and accurately calculate the four-year graduation rate in order to (a) give parents and the public accurate information about the success of a school, LEA, and State in graduating students and (b) ensure that AYP determinations are based on valid graduation rate calculations. States should establish clear and consistent business rules and data checks to safeguard against incorrect coding of students who leave a school or LEA. Along with establishing business rules, States should also train staff how to properly code student transfers.

Regular high school diploma

A-33. How is a "regular high school diploma" defined?

Under 34 C.F.R. §200.19(b)(1)(iv), a "regular high school diploma" means the standard high school diploma awarded to students in a State that is fully aligned with the State's academic content standards and does not include a GED credential, certificate of attendance, or any alternative award. The term "regular high school diploma" also includes a "higher diploma" that is awarded to students who complete requirements above and beyond what is required for a regular diploma.

A-34. May a GED, alternative diploma, or certificate of attendance be counted as a regular high school diploma?

No. Alternative graduation credentials that are not fully aligned with a State's academic content standards may not be counted as a regular high school diploma for the purpose of calculating the four-year or extended-year graduation rate. Thus, students who graduate with a credential other than a regular high school diploma, such as a GED, modified diploma, or certificate of attendance, may not be included in the numerator, but must be included in the denominator of the four-year and extended-year graduation rate.

Transitional graduation rate

A-35. What graduation rate may a State use until it implements the four-year graduation rate?

All States are required to report the four-year graduation rate on report cards, required under section 1111(h) of ESEA, that report assessment results for the 2010-2011 school year. Until that time, States may use a graduation rate that measures the percentage of students from the beginning of high school who graduate with a regular high school diploma in the standard number of years or another definition developed by the State and approved by the Secretary that more accurately measures the rate of student graduation from high school with a regular high school diploma (34 C.F.R. §200.19(b)(2)). In most cases, the transitional graduation rate will be the one a State used for Title I reporting and accountability purposes prior to the issuance of the 2008 Title I regulations. States should, however, implement the four-year graduation rate (as

defined in 34 C.F.R. §200.19(b)(1)(i)-(iv)) as soon as they are able because it provides the most accurate information about the success of schools, LEAs, and States in graduating students on time with a regular high school diploma.

A-36. If a State uses a transitional graduation rate, must it submit that rate to the Secretary for approval?

Yes. Any State that uses a transitional graduation rate must submit to the Secretary the definition of that rate and the State's timeline for implementing the four-year graduation rate as part of its revised Accountability Workbook (34 C.F.R. §200.19(b)(6)(i)(A)-(B)).

A-37. How long may a State use a transitional graduation rate?

A State must begin using the four-year graduation rate for reporting assessment results for the 2010-2011 school year and for determining AYP based on school year 2011-2012 assessment results. Until that time, a State may use a transitional graduation rate. Any State that cannot meet the 2010-2011 deadline for reporting the four-year graduation rate may request an extension of that deadline from the Secretary. (See questions F-2 through F-6 for more information about requesting an extension of the deadline.) After receiving such a request, the Secretary may permit a State to continue to use its approved transitional graduation rate until it can implement the four-year graduation rate. However, if the circumstances in a State are such that there will be a significant delay in implementing the four-year graduation rate, the Secretary may require the State to use a more rigorous transitional graduation rate (e.g., the Averaged Freshman Graduation Rate) until such time as the State is able to implement the four-year graduation rate.

SECTION B. GOAL AND ANNUAL TARGETS

B-1. Must a State establish a graduation rate goal and annual targets?

Yes. Under 34 C.F.R. §200.19(b)(3), a State must set (a) a single graduation rate goal that represents the rate the State expects all high schools in the State to meet, and (b) annual graduation rate targets that reflect continuous and substantial improvement from the prior year toward meeting or exceeding the State's graduation rate goal. High schools and LEAs with low rates of graduation should not make AYP by simply maintaining the same low rate or minimally increasing it from year to year. At a time when a high school diploma is the absolute minimum credential needed for success in the labor force, States must set aggressive goals and hold LEAs and high schools accountable for graduating more of their students.

The 2008 Title I regulations require States to submit to the Department, for peer review, their graduation rate goal and targets (34 C.F.R. §200.19(b)(6)(i)(C)). States must provide an explanation of how the State's graduation rate goal represents the rate the State expects all high schools in the State to meet and how the State's annual targets demonstrate continuous and substantial improvement from the prior year toward meeting or exceeding the State's goal (34 C.F.R. §200.19(b)(6)(i)(D)). In addition, States also must submit the graduation rate for the most recent school year of the high school at the 10th percentile, the 50th percentile, and the 90th

percentile in the State, ranked in terms of graduation rate (34 C.F.R. §200.19(b)(6)(i)(E)). Such information will provide the Department and the public with a better understanding of how States are doing in graduating students on time with a regular diploma, as well as context to evaluate the State's goal and targets.

B-2. When is a State required to set a graduation rate goal and annual targets that meet the requirements in the 2008 Title I regulations?

Beginning with AYP determinations based on school year 2009-2010 assessment results, a State must have a single goal and annual targets that meet the criteria in 34 C.F.R. §200.19(b)(3)(i), regardless of whether the State is using the four-year graduation rate or a transitional graduation rate. A State may amend its Accountability Workbook to change its goal and targets once it begins using the four-year graduation rate for reporting and AYP determinations.

Graduation rate goal

B-3. Must a State set the same graduation rate goal for all high schools?

Yes. As required in 34 C.F.R. §200.19(b)(3)(i)(A), each State must set a single graduation rate goal that represents the graduation rate it expects all high schools in the State to meet. Moreover, if a State chooses to implement an extended-year graduation rate, the goal for this rate must be the same as the rate for the four-year graduation rate.

B-4. Is a State required to use a specific process or method to determine its graduation rate goal?

No. There is no specific process or method that a State must use to establish its graduation rate goal. Given the variation in State assessment and accountability systems and differences in State graduation requirements, the Department believes that this decision is best left to each State. Additionally, the State's graduation rate goal need not be 100 percent because the Department recognizes that not all students graduate with a regular high school diploma. However, because all but a small percentage of students can and should graduate with a regular diploma on time, the Department expects each State to establish a rigorous graduation rate goal. This goal must be submitted to the Department, in its revised Accountability Workbook, along with an explanation of how the goal represents the rate it expects all high schools in the State to meet. (See question E-2.)

Annual graduation rate targets

B-5. In addition to establishing a graduation rate goal, must a State establish annual graduation rate targets?

Yes. A State must establish annual graduation rate targets that reflect continuous and substantial improvement from the prior year toward meeting or exceeding the State's graduation rate goal

(34 C.F.R. §200.19(b)(3)(i)(B)).¹⁰ High schools and LEAs may meet the other academic indicator (i.e., graduation rate) by either meeting (or exceeding) the State’s goal or meeting (or exceeding) the annual graduation rate targets.

B-6. Must a State’s annual graduation rate targets be the same for all high schools and LEAs in the State?

No. Although a State may set a single annual graduation rate target (e.g., a 10 percentage point increase in the graduation rate from the prior year), the State may establish targets that vary for different schools and LEAs within a State. Among the possible methods that a State might use in establishing its targets are the following:

- A State could create “performance bands” by grouping schools based on their current graduation rates and requiring different levels of growth for each band. For example, a State might establish a target for schools below the 25th percentile to increase their graduation rate by 10 percentage points; a target for schools between the 25th and 50th percentiles to increase their graduation rate by 5 percentage points; and so on.
- A State could require schools below the State’s graduation rate goal to reduce the percentage of students who do not graduate on time by a particular percentage (e.g., 10 percent) from the preceding school year. Such a method would require more improvement for schools with the lowest graduation rates that are the farthest from the State’s goal.
- A State could set a “floor,” below which it would not be possible to meet the other academic indicator (i.e., graduation rate) in determining AYP. Above that floor, the State could set targets towards meeting the State’s graduation rate goal. For example, a State might establish a graduation rate goal of 95 percent, a floor of 60 percent, and targets requiring a 5 percentage point increase from the prior year. Using this method, a school with a graduation rate of 58 percent (below the floor) would not meet the other academic indicator and, thus, would not make AYP. On the other hand, a school with a graduation rate of 70 percent (above the floor) would have to demonstrate at least a 5 percentage point improvement in its rate from the previous year to meet the other academic indicator and make AYP (assuming it met all other requirements for making AYP).
- A State could set a floor but require two targets: a more aggressive target for schools with a graduation rate below the floor and a less aggressive target for schools with a graduation rate above the floor. For example, a State might set a goal of 90 percent, a floor of 60 percent, and two targets: a 10 percentage point increase for schools below the floor of 60 percent and a 5 percentage point increase for schools above the floor of 60 percent.

¹⁰ In order to indicate that a State may set more than one target, for ease of reference, this guidance uses the term “targets” when referring to a State’s target or targets. The State may establish targets that vary for different schools and LEAs within a State.

It is important to note that these are merely examples of how a State might set different targets for high schools and LEAs in the State and are not meant to be exhaustive; the Department is open to a variety of ways that States might set their graduation rate targets. However, if a State uses a method that allows for more than one annual target, the Department would expect the State to require schools and LEAs with lower graduation rates to make more progress than schools and LEAs closer to the State's graduation rate goal.

B-7. How will the Department determine whether a State's annual targets demonstrate "continuous and substantial improvement" toward the State's graduation rate goal?

The regulations require States to establish annual targets that would, if met, result in "continuous and substantial improvement" from the prior year but do not specify what those targets must be. The term "continuous and substantial" reflects the Department's intent that schools and LEAs below their State's graduation rate goal continually increase their graduation rate until reaching the goal and that the required amount of progress be substantial enough to result in schools and LEAs meeting the goal within a reasonable period of time. A target such as "any improvement" or an improvement of as little as 0.1 percentage point from the previous year would not meet the requirement that targets reflect continuous and substantial improvement in a graduation rate. The Education Trust examines States' goals and targets in the report, *Counting on Graduation: An Agenda for State Leadership*, and also calls for States to set a more aggressive goal and annual targets.¹¹

The Department will review each State's annual targets in relation to the State's graduation rate goal, along with the State's rationale and supporting data. As explained in question E-2, a State must submit, among other information, the following as part of its revised Accountability Workbook:

- The State's graduation rate goal and targets (34 C.F.R. §200.19(b)(6)(i)(C)).
- An explanation of how the State's graduation rate goal represents the rate the State expects all high schools to meet and how the State's targets demonstrate continuous and substantial improvement from the prior year toward meeting or exceeding the goal (34 C.F.R. §200.19(b)(6)(i)(D)); and
- The graduation rate of the schools at the 10th percentile, the 50th percentile, and the 90th percentile in the State (ranked in terms of graduation rate) (34 C.F.R. §200.19(b)(6)(i)(E)).

The purpose of these requirements is to provide information to the Department and the public that will increase understanding of the rigor of a State's goal and targets. By knowing a State's graduation rate goal, its targets, and the graduation rates of the schools at the various percentiles, the Department and the public can determine the number of years it will take for schools in the State to reach the State's goal, assuming that the schools meet the target each year. For example,

¹¹ Habash, A. (2008). *Counting on Graduation: An Agenda for State Leadership*. Washington, DC: The Education Trust. The report can be found at: <http://www2.edtrust.org/NR/rdonlyres/6CA84103-BB12-4754-8675-17B18A8582AC/0/CountingonGraduation1008.pdf>

if a State establishes 90 percent as its graduation rate goal and a 5 percentage point increase each year for its targets, and if the school in the State at the 50th percentile had a graduation rate of 50 percent, the Department would be able to determine that it would take eight years for that school to reach the State's goal, assuming that it met the target each year.

B-8. If a State chooses to establish an extended-year graduation rate, must the State use the annual targets it uses for the four-year graduation rate?

If a State chooses to implement an extended-year graduation rate, the targets for the extended-year graduation rate may differ from those for the four-year graduation rate. Note, however, that the goal for an extended-year rate must be the same as the goal for the four-year graduation rate (see question B-3).

B-9. Must a school that meets a State's graduation rate goal also meet the State's annual targets?

No. In order to meet the "other academic indicator," a school or LEA must either meet or exceed the graduation rate goal or meet the targets that demonstrate continuous and substantial improvement from the prior year toward meeting or exceeding the State's goal.

SECTION C. REPORTING

C-1. When are States and LEAs required to report the four-year graduation rate?

Under 34 C.F.R. §200.19(b)(4)(ii)(A), a State and its LEAs must report the four-year graduation rate on report cards providing assessment results for the 2010-2011 school year.¹² For report cards providing assessment results for the 2008-2009 and 2009-2010 school years, States and LEAs may report either a transitional graduation rate or the four-year graduation rate (34 C.F.R. §200.19(b)(4)(ii)(C)). States and LEAs should report their graduation rate using the four-year graduation rate as soon as they are able.

C-2. Must an LEA report a graduation rate for each of its high schools?

Yes. An LEA must report a graduation rate, consistent with the timeline in 34 C.F.R. §200.19(b)(4), in the aggregate and disaggregated by subgroups, for any school with a graduating cohort unless doing so would reveal personally identifiable information (i.e., unless the number of students is below the State's minimum group size for reporting purposes) (34 C.F.R. §200.19(b)(4)(i)).

C-3. When must States and LEAs first report the four-year graduation rate disaggregated by subgroups? For which subgroups must the data be disaggregated?

¹² An LEA's report card must include the graduation rate of the LEA, in the aggregate and disaggregated by subgroups, and the graduation rate for each of the schools in the LEA, in the aggregate and disaggregated by subgroups (Section 1111(h)(2)(B); 34 C.F.R. §200.19(b)(4)(i)).

Beginning with report cards providing assessment results for the 2010-2011 school year, States and LEAs must report the four-year graduation rate in the aggregate and disaggregated by subgroups. The required subgroups are those specified in 34 C.F.R. §200.13(b)(7)(ii): economically disadvantaged students, students from major racial and ethnic groups, students with disabilities, and LEP students. States and LEAs are *not* required to disaggregate graduation rate data by migrant status or gender for the purpose of reporting graduation rates.¹³ A State's desire to lag data to include summer graduates or to use an extended-year graduation rate in AYP determinations is not a sufficient reason to extend the 2010-2011 deadline for reporting the four-year graduation rate.

For report cards providing assessment results for the 2008-2009 and 2009-2010 school years, a State and its LEAs must report the graduation rate, in the aggregate and disaggregated by the subgroups listed above, using either the State's transitional graduation rate or the four-year graduation rate.

C-4. May a State and its LEAs report an extended-year graduation rate in place of the four-year graduation rate?

No. If a State includes an extended-year graduation rate in its AYP determinations, it must calculate and report that rate separately from, and in addition to, the four-year graduation rate.

C-5. Where must States and LEAs report graduation rate?

States and LEAs must report graduation rate data, in the aggregate and disaggregated by subgroups, on their annual report cards. In addition, States must submit aggregated and disaggregated graduation rates to *EDFacts*, the centralized portal through which States submit their education data to the Department (OMB collection 1810-0614). These data will be used to generate the Consolidated State Performance Report information on graduation rates.

Beginning with the 2010-2011 school year, States must report the following data to *EDFacts*:

- The four-year graduation rate and the extended-year graduation rate (if any) at the school, LEA, and State levels, in the aggregate and disaggregated by subgroup; and
- The number of students in the numerator and in the denominator of the four-year graduation rate calculation and the extended-year graduation rate calculation (if any).

States that can do so are highly encouraged to report the data to *EDFacts* beginning with the 2008-2009 school year.

¹³ The list of disaggregated groups in section 1111(h)(1)(C)(i) of the ESEA, which includes gender and migrant status in addition to the subgroups in §200.13(b)(7)(ii), pertains to reporting disaggregated achievement results on a State's academic assessments. Section 1111(h)(C)(vi) of the ESEA, which requires reporting graduation rates for secondary school students, contains no similar list of disaggregation categories. Accordingly, the Department has taken its cue from section 1111(b)(2)(C)(v)(II) of the ESEA and §200.13(b)(7)(ii), which list the subgroups for which a State must disaggregate data for AYP purposes. It is these categories that a State uses to calculate "safe harbor" and that these regulations now require for disaggregating AYP results. Therefore, these regulations require reporting of disaggregated graduation rates only by the categories that are used for other AYP purposes, because graduation rate data will already be disaggregated by those categories.

C-6. May a State and its LEAs include in their annual report cards additional information about graduation rate?

Yes. Under section 1111(h) of the ESEA, a State and its LEAs may include in their annual report cards any other information, in addition to the information required by the statute, they deem appropriate. For example, a State or LEA may include information on the percentage of students who drop out, the percentage of first-time 9th graders who were promoted on time, or the number of students graduating with modified diplomas or alternative credentials. Such information might help parents and members of the public better comprehend the facts and circumstances surrounding the reported graduation rate.

C7. Do the 2008 Title I regulations require States or LEAs to report dropout data on their report cards?

No. Dropout data are not required to be reported on State or LEA report cards. However, irrespective of these regulations, data on the number of students who drop out are collected as part of the Common Core of Data (a data collection of the Department's National Center for Education Statistics that annually collects fiscal and non-fiscal data about all public schools, LEAs, and States in the United States). In addition, States must annually report a disaggregated State-level drop out rate as part of their Consolidated State Performance Report. The Department does not anticipate additional reporting requirements regarding drop out data at this time.

SECTION D. GRADUATION RATE IN ACCOUNTABILITY DETERMINATIONS

Including graduation rate in AYP determinations

D-1. When must a State begin to use the four-year graduation rate in AYP determinations?

Unless a State receives approval for an extension from the Secretary, the State must include the four-year graduation rate in AYP determinations beginning with determinations based on the assessments administered in the 2011-2012 school year (34 C.F.R. §200.19(b)(5)(i)). However, States should begin using the four-year graduation rate in AYP determinations as soon as they are able.

D-2. When may a State begin using an extended-year graduation rate in AYP determinations?

A State may begin using an extended-year graduation rate as soon as it has the necessary data to calculate the rate. Each State must describe in its Accountability Workbook how it will use an extended-year graduation rate with its four-year graduation rate to determine whether its schools and LEAs have met the other academic indicator in calculating AYP. The Accountability Workbook must be peer-reviewed and approved by the Secretary before the State may use an extended-year rate in AYP determinations (34 C.F.R. §200.19(b)(6)(i)(F)). A State's desire to

use an extended-year graduation rate in AYP determinations is not a sufficient reason to extend the 2010-2011 deadline to report the four-year graduation rate.

D-3. May a State “lag” its graduation rate data to include summer graduates in its four-year or extended-year graduation rate?

Yes. As explained in question A-6, a State may lag its graduation rate data in order to include summer graduates in AYP determinations. Using lagged graduation rate data in AYP determinations means that the four-year graduation data from the previous academic year will be used in AYP determinations with the assessment results and participation rate for the current academic year. Lagging data is permitted for both the four-year and extended-year graduation rates.

As noted in question C-3, a State’s desire to lag data is not a sufficient reason to extend the 2010-2011 deadline to report the four-year graduation rate. A State must report the four-year graduation rate for 2010-2011 and use that rate in AYP determinations for 2011-2012, regardless of whether the State can use lagged data in calculating its four-year or extended-year graduation rate.

If a State intends to lag its graduation rate data in AYP determinations, the State must amend its Accountability Workbook for approval by the Secretary. The State should include in its request a description of how the State will handle the transition to the lagged four-year or extended-year graduation rate, including whether the State will use the same year’s graduation data to make AYP determinations for two consecutive years.¹⁴ Once employed, lagging should be used consistently throughout the State and over time.

States and LEAs that lag their graduation rate data in AYP determinations should be clear about this practice on their report cards. For example, the State and LEA should explain on their report cards that the previous school year’s graduation rate data are used in the current school year’s AYP determination in order to include summer graduates.

D-4. How may a State include an extended-year graduation rate in its AYP determinations?

The Department anticipates that States will propose a number of ways to include an extended-year graduation rate in their AYP determinations. If a State chooses to use an extended-year graduation rate, the AYP calculation would include different cohorts of students. For example, if a State were to use a five-year graduation rate as part of its AYP determination, the State would base its AYP determinations in 2011-2012 on the four-year adjusted cohort that started 9th grade

¹⁴ For example, in 2011-2012, a State may not have enough years of data to lag its four-year graduation rate to include summer graduates, so it must use the four-year graduation rate that includes students who graduate by the end of the 2011-2012 school year (without summer graduates). In 2012-2013, the State begins to lag its graduation rate data, and again uses the four-year graduation rate from the 2011-2012 school year, but this time includes summer graduates.

in 2008-2009 and the five-year adjusted cohort that started in 9th grade in 2007-2008. The table below presents this example.

Four-year and extended-year graduation rates included in AYP determinations based on assessments administered in 2011-2012			
Rate	First-time 9th graders	Cohort population	Regular high school diploma recipients
Four-year graduation rate	2008-2009	First-time 9th graders in 2008-2009 plus all students who transfer into the cohort minus students who transfer out, emigrate, or die by the end of the 2011-2012 school year	All students in the cohort population who receive a regular high school diploma in four years or less by the end of the 2011-2012 school year
Five-year graduation rate	2007-2008	First-time 9th graders in 2007-2008 plus all students who transfer into the cohort minus students who transfer out, emigrate, or die by the end of the 2011-2012 school year	All students in the cohort population who receive a regular high school diploma in five years or less by the end of the 2011-2012 school year

Two possible ways to include an extended-year graduation rate in determining whether a school meets the other academic indicator for AYP calculations are outlined below. Please note that these are examples and do not represent all the ways a State might include an extended-year graduation rate in AYP calculations. We encourage States to contact the Department with any specific questions or requests for technical assistance related to calculating AYP with an extended-year graduation rate.

- A State could set separate annual targets (but have the same goal) for the four-year graduation rate and the extended-year graduation rate. The State would first examine whether a school or LEA met the goal or the targets for the four-year graduation rate. If it did not, the State could then determine whether the school or LEA met the extended-year graduation rate targets. Meeting the goal or the targets for either of the rates would mean that the school or LEA met the other academic indicator for AYP. The Department expects that States using such a methodology will set aggressive targets, including more aggressive targets for the extended-year rate than for the four-year rate.
- A State could combine its extended-year graduation rate with the four-year graduation rate and compare the combined graduation rate with the State’s goal and annual targets to determine if a school or LEA met the other academic indicator in calculating AYP. For

example, a State that includes a five-year extended-year graduation rate in its AYP determinations might assign the four-year graduation rate 80 percent of the weight and the five-year graduation rate 20 percent of the weight. If a school's four-year graduation rate is 62 percent and its five-year graduation rate is 68 percent, the weighted rate would be:

$$\text{Weighted rate} = [(.80 * 62.0) + (.20 * 68.0)] = 63.2$$

A weighted rate would be calculated for each subgroup. The State would then compare the weighted rates (e.g., 63.2 percent at the school level) with the State's graduation rate goal and annual targets to determine if the school, in the aggregate and each subgroup, met the other academic indicator for AYP. For States that use such a weighted rate, the Department anticipates approving only rates that give the predominant weight to the four-year graduation rate. The Department strongly encourages any State using such a weighted rate to give predominant weight to the four-year rate.

D-5. What does it mean to make “progress on one or more of the academic indicators” in order to make AYP through “safe harbor”?

Under section 1111(b)(2)(I) of the ESEA, if a subgroup, school, or LEA does not meet or exceed the State's annual measurable objective in reading/language arts or mathematics in a given year, the subgroup, school, or LEA may make AYP if (1) the percentage of students who were not proficient in that year decreased by at least 10 percent from the prior year and (2) the subgroup, school, or LEA made “progress on one or more of the academic indicators described in [section 1111(b)(2)(C)(vi) or (vii)]” (“safe harbor”). “Progress” on the other academic indicator is determined by a State's implementation of the requirements in 34 C.F.R. §200.19.

- Other academic indicator for elementary and middle schools: Under 34 C.F.R. §200.19(a)(2), a State may, but is not required to, increase over time the goals of its other academic indicators for elementary and middle schools. If a State sets goals that increase over time, a subgroup, school, or LEA may make AYP through “safe harbor” only if it meets or exceeds the requisite increase as defined by the State. On the other hand, if a State does not require a specific increase, a subgroup, school, or LEA may make AYP through “safe harbor” if it demonstrates “progress” from the prior year on the other academic indicator.
- Other academic indicator for high schools: “Making progress” on the other academic indicator for high schools means meeting or exceeding the State's graduation rate goal or annual targets. This is because 34 C.F. R. §200.19(b)(3) requires a State to set (1) a single graduation rate goal that represents the rate the State expects all high schools to meet and (2) annual graduation rate targets that reflect continuous and substantial improvement from the prior year toward meeting or exceeding the State's graduation rate goal. Accordingly, a subgroup, school, or LEA must meet or exceed the State's graduation rate goal or annual targets in order to make AYP through “safe harbor.”

Disaggregating graduation rate data for AYP determinations

D-6. When must a State include disaggregated graduation rates in AYP determinations?

A State must include disaggregated graduation rates in AYP determinations beginning with determinations based on assessments administered in the 2011-2012 school year (34 C.F.R. §200.19(b)(5)(i)). If a State is not able to calculate the four-year graduation rate by 2011-2012, it must disaggregate data for its transitional graduation rate for use in AYP determinations. If a State chooses to implement the four-year graduation rate before the deadline, it is not required to disaggregate data using the four-year graduation rate for AYP determinations until the 2011-2012 deadline.

D-7. Why is it important to disaggregate graduation data for AYP purposes?

Nearly six years after the implementation of NCLB, we now know that simply reporting disaggregated graduation rate data is not sufficient to address the problem of wide disparities in graduation rates among different student subgroups. We believe schools and LEAs must be held accountable for the differences in graduation rates among subgroups. Just as disaggregating assessment results helps ensure that high performance by the “all students” group does not mask low performance by subgroups of students, disaggregating graduation rate data helps to ensure that a high graduation rate among the “all students” group does not mask low graduation rates among certain student subgroups.

D-8. How have the 2008 Title I regulations changed the requirements for disaggregating graduation rate data?

Prior to the 2008 Title I regulations, a State was required to disaggregate graduation rate data for reporting purposes under section 1111(h) of the ESEA, when calculating safe harbor under 34 C.F.R. §200.20(b)(2), and if the State included additional other academic indicators in AYP under section 1111(b)(2)(C)(vii) of the ESEA. However, disaggregated graduation rate data were not required to be included in the so-called “status” model for AYP calculations. Under the 2008 Title I regulations, a State also must disaggregate graduation rate data for determining AYP for all high schools, LEAs, and the State beginning with AYP determinations based on assessments administered during the 2011-2012 school year (34 C.F.R. §200.19(b)(5)(i)).

D-9. Must States disaggregate graduation rate data for the “other academic indicator” used in making AYP determinations for the same subgroups that are used in AYP proficiency determinations?

Yes. The regulations require disaggregation of graduation rate data for the same subgroups that are used to determine whether students in various subgroups have achieved proficiency. The subgroups for which graduation rate data must be disaggregated are the following: economically disadvantaged students; students from major racial and ethnic groups; students with disabilities, as defined in section 9101(5) of the ESEA; and LEP students, as defined in section 9101(25) of the ESEA. (See question C-3.)

D-10. Must data for an extended-year graduation rate be disaggregated?

Yes. If a State chooses to use an extended-year graduation rate, that rate must be disaggregated by the subgroups listed in 34 C.F.R. §200.13(b)(7)(ii) for reporting and for AYP determinations.

Using statistical measures in graduation rate calculations for AYP determinations

D-11. May a State apply a minimum group size for including graduation rate in AYP determinations?

Yes. 34 C.F.R. §200.7 requires that a State determine the minimum number of students sufficient to yield statistically reliable information for each purpose for which disaggregated data are used and to protect the privacy of individual students.¹⁵ Because graduation rates must be disaggregated for AYP calculations, a State may apply a minimum group size in order to guard against a school not making the other academic indicator in determining AYP because of fluctuations in data that can result when AYP is calculated based on the performance of a small number of students. For example, if only five students are enrolled in grade 12 in a small, rural high school and the State's graduation rate goal is 85 percent, every member of the cohort would need to graduate on time for the school to meet the State's graduation rate goal. The minimum group size mitigates against minor year-to-year fluctuations in data when there are very small numbers of students in the student body in general, or its subgroups, causing a school or LEA to not make AYP. A State must also apply a minimum group size for reporting graduation rates to protect the privacy of individual students.

D-12. Are there any limits to the minimum group size for graduation rate?

The Department does not expect to approve a State's minimum group size for graduation rate that is larger than the minimum group size for its assessment participation rate. Similar to participation rate, graduation rate is a count and is not sensitive to measurement error. However, it is sensitive to fluctuations in very small cohorts of students. As such, the Department believes it is appropriate to permit a minimum group size for graduation rate that is the same as or less than the minimum group size used with participation rates. The Department, however, does not believe a State's minimum group size for graduation rate should exceed the minimum group size for its participation rate.

D-13. Will the Department approve the use of confidence intervals to determine whether a high school or LEA meets the other academic indicator (i.e., graduation rate)?

No. The Department does not believe that it is appropriate to use a confidence interval with graduation rate because the graduation rate is not based on a sample of a school's population; it is based on the full population of a given cohort in the school.

¹⁵ States may have different minimum group sizes for different purposes. For instance, a State's minimum group size for reporting might be lower than its minimum group size for proficiency because it has a different purpose. The purpose of the minimum group size for reporting is to protect the privacy of individual students, whereas the purpose of the minimum group size for proficiency is to provide reliable proficiency information while ensuring the maximum inclusion of all students and student subgroups in AYP determinations.

D-14. Will the Department permit a State to average graduation rate data across years in making AYP determinations?

Yes. Section 1111(b)(2)(J) of the ESEA permits a State to use an average of data over two or three years and thereby minimize annual variations in data, particularly those involving very small populations that may lead a school or LEA not to make AYP. Thus, a State may average graduation rate data across years in making AYP determinations. A State may either (a) average graduation rate data for the school year for which the determination is made with data from one or two school years immediately preceding that school year, or (b) choose the highest graduation rate from among the rate for the current year or from the two or three year average when determining whether the school or LEA has met the other academic indicator for AYP determinations.

While the statute allows flexibility to average data across years for making AYP determinations, it is important to note that, for reporting purposes, States and LEAs must report on their report cards the graduation rate for the current year without averaging, unless the number of students in that rate is below the State's minimum group size for reporting purposes.

D-15. Does the “full academic year” provision apply to graduation rate?

No. Under section 1111(b)(3)(C)(xi) of the ESEA, a State may not include in AYP determinations the assessment results of students who have not been enrolled in a single school or LEA for a “full academic year.” Thus, each State has defined “full academic year,” typically by some number of days or months between a date certain and the testing window. The concept of “full academic year,” both by its placement in the statute under the assessment requirements, and logically, does not apply to graduation rate. Earning a diploma is a multi-year process, and the four-year and extended-year graduation rates follow cohorts of students over four or more years. These rates intentionally account for students moving in and out of a school. Thus, calculating graduation rates is inconsistent with the concept of a student's placement in a single grade for a “full academic year.”

SECTION E. ACCOUNTABILITY WORKBOOK

E-1. Must a State revise its Accountability Workbook to address the graduation rate requirements in the 2008 Title I regulations?

Yes. Each State must submit a revised Accountability Workbook to the Department for technical assistance and peer review (34 C.F.R. §200.19(b)(6)(ii)).

E-2. What information related to graduation rate must a State include in its revised Accountability Workbook?

In accordance with 34 C.F.R. §200.19(b)(6)(i), each State must include the following information in its revised Accountability Workbook regarding graduation rate:¹⁶

- The graduation rate definition that the State will use to determine AYP based on school year 2009-2010 assessment results.
- A description of the progress the State is making toward meeting the deadline for calculating and reporting the four-year graduation rate on report cards providing assessment results for the 2010-2011 school year.
- The State's graduation rate goal and annual targets beginning with the 2009-2010 school year.
- An explanation of how the State's graduation rate goal represents the rate the State expects all high schools in the State to meet and how the State's annual targets demonstrate continuous and substantial improvement from the prior year toward meeting or exceeding the State's goal.
- The graduation rate for the most recent school year of the high school at the 10th percentile, the 50th percentile, and the 90th percentile in the State, ranked in terms of graduation rate.
- If the State intends to use an extended-year graduation rate in AYP determinations, a description of how it will use that rate with its four-year graduation rate to determine whether its schools and LEAs have made AYP.

E-3. When must a State submit its revised Accountability Workbook?

A State must submit its revised Accountability Workbook in time for relevant changes to be in effect for AYP determinations based on school year 2009-2010 assessment results (34 C.F.R. §200.19(b)(6)(ii)). Note that this timeframe is for submitting the information required in E-2, not the timeframe for implementing, for example, the four-year graduation rate.

SECTION F. TIMELINE AND EXTENSION

Timeline

F-1. What is the timeline for implementing the graduation rate requirements?

The following table shows the timeline for implementing the graduation rate requirements in the 2008 Title I regulations:

¹⁶ Section 200.7(a)(ii) also requires certain other information regarding the State's minimum group size to be included in its revised Accountability Workbook.

Implementation Timeline for Graduation Rate

	School Year and Regulatory Requirements			
	2008-2009	2009-2010	2010-2011	2011-2012
<u>AYP</u>	AYP based on 2008-2009 assessment results	AYP based on 2009-2010 assessment results	AYP based on 2010-2011 assessment results	AYP based on 2011-2012 assessment results
	States must calculate high school graduation rate for AYP determinations in the aggregate using an approved transitional rate or the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate.			States must calculate high school graduation rate for AYP, in the aggregate and disaggregated by subgroup, using the four-year graduation rate (and may use an extended-year graduation rate).
<u>Reporting</u>	States must report graduation rate data, in the aggregate and disaggregated by subgroup, using an approved transitional rate or the four-year graduation rate (any extended-year graduation rate must be reported separately).		Beginning with report cards providing assessment results for the 2010-2011 school year, States must report graduation rate data, in the aggregate and disaggregated by subgroup, using the four-year graduation rate (any extended-year graduation rate must be reported separately).	
<u>Goals and Targets</u>	States may use current goals and targets.	States must have a single goal and one or more targets that meet the criteria in the regulations. States may need to change their goal and targets when they begin using the four-year graduation rate for AYP.		

Extension of Deadline

F-2. What if a State cannot meet the deadline in the 2008 Title I regulations?

If a State or its LEAs cannot calculate the four-year graduation rate in time to report it on either the State or LEA report card providing assessment results for the 2010-2011 school year, the State may request an extension of the deadline from the Secretary (34 C.F.R. §200.19(b)(7)(i)). The Secretary will approve such a request on a case-by-case basis. The length of the extension will be determined based on a review of the State’s detailed plan and timeline, and the

reasonableness of the request. Any extension of the reporting deadline will necessarily include an extension of the 2011-2012 deadline for using the four-year graduation rate in AYP determinations. For the first year that a State is able to calculate the four-year graduation rate, the Department will not require the State to use the four-year graduation rate for both reporting and accountability purposes because the Department understands that, when a State first implements the four-year graduation rate, it will likely need time to check the accuracy of its calculations and make adjustments to its system before using the four-year rate in AYP determinations. Even if a State receives an extension of the reporting deadline and of the deadline for using the four-year rate in AYP determinations, it must still disaggregate its transitional graduation rate by each subgroup described in 34 C.F.R. §200.13(b)(7)(ii) at the school, LEA, and State levels, beginning with AYP determinations based on school year 2011-2012 assessment results (34 C.F.R. §200.19(b)(7)(iii)).

F-3. When must a State request an extension of the deadline to implement the four-year graduation rate?

Any State that wants an extension of the deadline for reporting the four-year graduation rate must submit the request to the Secretary by March 2, 2009 (34 C.F.R. §200.19(b)(7)(ii)).

F-4. If a State is unsure if it can meet the 2010-2011 deadline, should it submit a request for an extension?

Yes. If a State is unsure if it can meet the 2010-2011 reporting deadline, it should submit a request for an extension by March 2, 2009.

F-5. What are the consequences for a State that does not request and receive an extension and does not meet the 2010-2011 deadline?

Any State that does not meet the 2010-2011 deadline for reporting the four-year adjusted cohort graduation rate and that did not submit a request for an extension by March 2, 2009 and have its request granted by the Secretary will be out of compliance with the regulations. As such, the Secretary has the discretion to take appropriate action, including, but not limited to, the following: placing a condition on a State's Title I, Part A grant award; requiring the State to enter into a compliance agreement with the Department; or withholding Title I, Part A State administration funds.

F-6. What evidence should a State submit to support its request for an extension?

Any request for extension must include: (1) evidence demonstrating that the State cannot meet the deadline, and (2) a detailed plan and timeline addressing the steps the State will take to implement, as expeditiously as possible, the four-year graduation rate (34 C.F.R. §200.19(b)(7)(ii)). For example, a State that cannot meet the deadline might include documents outlining the efforts the State has already made to implement the four-year graduation rate, an explanation of the challenges and barriers the State faces in implementing the four-year graduation rate on time, and possible strategies to overcome those barriers.

Attachment A

Four-year adjusted cohort graduation rate for the first time 9th grade cohort of 2008-09

School Year 2008-09		School Year 2009-10		School Year 2010-11	
First-time 9th grade students in 2008-09 =	100	Adjusted 08-09 9th grade cohort =	105	Adjusted 08-09 9th grade cohort =	100
Dropouts =	10	Dropouts =	5	Dropouts =	5
Transfers out =	15	Transfers out =	10	Transfers out =	10
Transfers in =	20	Transfers in =	5	Transfers in =	5
Diplomas earned 08-09 =	0	Diplomas earned 09-10 =	0	Diplomas earned 10-11 =	2
Cohort end of 08-09 =	$100 - 15 + 20 = 105$	Cohort end of 09-10 =	$105 - 10 + 5 = 100$	Cohort end of 10-11 =	$100 - 10 + 5 = 95$
4-year adjusted cohort graduation rate =	NA	4-year adjusted cohort graduation rate =	NA	4-year adjusted cohort graduation rate =	NA
5-year adjusted cohort graduation rate =	NA	5-year adjusted cohort graduation rate =	NA	5-year adjusted cohort graduation rate =	NA

School Year 2011-12

Adjusted 08-09 9th grade cohort =	95
Dropouts =	1
Transfers out =	5
Transfers in =	10
Diplomas earned 11-12 =	63
Cohort end of 11-12 =	$95 - 5 + 10 = 100$
4-year adjusted cohort graduation rate =	$(2+63)/100 = 65\%$
5-year adjusted cohort graduation rate =	NA

For **AYP** for 2011-12:

- The 4-year adjusted cohort graduation rate is based on the cohort starting 9th grade for the first time in 2008-09 = 65%
- The 5-year adjusted cohort graduation rate (see attachment B) is based on the cohort starting 9th grade for the first time in 2007-08 = 67%

The cohort is the class of first time 9th graders of 2008-09.

The arrows show how to follow the cohort across sequential years.

The cohort size is adjusted at the end of each school year for out transfers and in transfers.

The 4-year graduation rate for AYP year 2011-12 is the percentage of students in the 2008-09 adjusted cohort (denominator) who earned a regular diploma by the end of 2011-12.

The 5-year graduation rate for AYP year 2011-12 is the percentage of students in the 2007-08 adjusted cohort (denominator) who earned a regular diploma by the end of 2011-12 (see attachment B).

Attachment B

Five-year adjusted cohort graduation rate for the first time 9th grade cohort of 2007-08

School Year 2007-08		School Year 2008-09		School Year 2009-10	
First-time 9th grade students in 2007-08 =	105	Adjusted 07-08 9th grade cohort =	110	Adjusted 07-08 9th grade cohort =	105
Dropouts =	10	Dropouts =	5	Dropouts =	5
Transfers out =	15	Transfers out =	10	Transfers out =	10
Transfers in =	20	Transfers in =	5	Transfers in =	5
Diplomas earned 07-08 =	0	Diplomas earned 08-09 =	0	Diplomas earned 09-10 =	1
Cohort end of 07-08 =	$105 - 15 + 20 = 110$	Cohort end of 08-09 =	$110 - 10 + 5 = 105$	Cohort end of 09-10 =	$105 - 10 + 5 = 100$
4-year adjusted cohort graduation rate =	NA	4-year adjusted cohort graduation rate =	NA	4-year adjusted cohort graduation rate =	NA
5-year adjusted cohort graduation rate =	NA	5-year adjusted cohort graduation rate =	NA	5-year adjusted cohort graduation rate =	NA

School Year 2010-11		School Year 2011-12		Summary of cohort as of 2011-12	
Adjusted 07-08 9th grade cohort =	100	Adjusted 07-08 9th grade cohort =	105	Of 106 students in the cohort at the end of 2011-12:	
Dropouts =	1	Dropouts =	5	- 26 had dropped out;	
Transfers out =	5	Transfers out =	2	- 66 had graduated on time or early	
Transfers in =	10	Transfers in =	3	(within 4 years) in 2010-11;	
Diplomas earned 10-11 =	65	Diplomas earned 11-12 =	5	- 71 had graduated within 5 years,	
Cohort end of 10-11 =	$100 - 5 + 10 = 105$	Cohort end of 11-12 =	$105 - 2 + 3 = 106$	(by the end of 2011-12);	
4-year adjusted cohort graduation rate =	see att. A for 2011-12 on-time rate	4-year adjusted cohort graduation rate =	see att. A for 2011-12 on-time rate	- and 9 were still in school.	
5-year adjusted cohort graduation rate =	NA	5-year adjusted cohort graduation rate =	$(1+65+5)/106 = 67\%$		

The cohort is the class of first time 9th graders of 2007-08.

The arrows show how to follow the cohort across sequential years.

The cohort size is adjusted at the end of each school year for out transfers and in transfers.

The 4-year graduation rate for AYP year 2011-12 is the percentage of students in the 2008-09 adjusted cohort (denominator) who earned a regular

diploma by the end of 2011-12 (see attachment A).

The 5-year graduation rate for AYP year 2011-12 is the percentage of students in the 2007-08 adjusted cohort (denominator) who earned a regular

diploma by the end of 2011-12.