



December 2010

Adjusted Cohort Graduation Rate in the District of Columbia

On October 29, 2008, the U.S. Department of Education finalized rulemaking that established a uniform graduation rate calculation required for all states.

Cohort graduation rates will improve DC's understanding of the students who do, and do not, earn a regular high school diploma within four years, and those students who take more than four years to earn a regular diploma. Further, cohort rates will more clearly describe the variety of paths taken by students who do not earn regular diplomas.

LEAs in the District of Columbia should begin preparing for the cohort graduation rate by:

1. Reading and understanding this guidance document.
2. Implementing the new withdrawal codes required by OSSE starting in the 2011-2012 school year.
3. Maintaining appropriate documentation for transfer students beginning immediately (though not required until the 2011-2012 school year).

This guidance document may not answer all questions but provides an important framework for understanding the rules established by the U.S. Department of Education in this matter. OSSE will release further guidance relating to the cohort graduation rate in the coming year; OSSE welcomes questions and suggestions from LEAs as to additional issues that could be covered in future guidance documents.

Questions on the Adjusted Cohort Graduation Rate in the District of Columbia may be addressed to Elizabeth Cohen, elizabeth.cohen@dc.gov or (202) 481-3848.



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A. The Four-year Adjusted Cohort Graduation Rate

A-1. What is the Four-year Adjusted Cohort Graduation Rate?

Pursuant to federal regulations, the term four-year adjusted cohort 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 that graduating class.¹

The term “adjusted cohort” means the students who enroll after the beginning of the entering cohort’s first year in high school, up to and including in grade 12.²

Practically speaking, this means that an incoming class of 9th graders shall be 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.

The four-year cohort graduation rate is the percentage of students in a cohort, adjusted for transfers into and out of the school, district, or state, that graduate with a regular high school diploma within four years of entering high school.

Thus, the final calculation for the class of 2011 will look like this:

of Students in Cohort who Graduated in June or August 2011 with a Standard Diploma
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of First Time 9 th Grade Students in Fall 2007 + Transfers-in – Transfers out – Emigrants – Students who passed away

Graduation rates will be calculated at the school, local education agency (LEA) and state level, and the rates will also be determined for major racial/ethnic subgroups as well for students with disabilities, students who are English language learners, and students who are economically disadvantaged. In addition, the final outcome (e.g., graduate, dropout, move to another state) for each student will be identified and the totals for each outcome will be reported for each school and LEA, as well as the state.

OSSE will prepare the data and calculate rates for schools, LEAs, and the state. LEAs will be asked to provide outcome data to students pursuant to section C of this guidance. LEAs will also have the opportunity to validate the enrollment of students included in the LEA’s cohort as well as in each school’s cohort within the LEA pursuant to section B of this guidance.

¹ 34 C.F.R. §200.19(b)(1)(i)(A)

² 34 C.F.R. § 200.19(b)(1)(ii)

The guiding principles for the determination of a cohort graduation rate are summarized below.

1. *The cohort graduation rate will be calculated for the state and every school and district with a grade 12 that issues diplomas.*
2. *The graduation rate will be calculated for major racial and ethnic subgroups, as well as the limited English proficient, students with disabilities, and economically disadvantaged subgroups.*
3. *All students enrolling in grades 9 through 12 in a public school in DC will be assigned to a cohort.*
4. *Students who transfer into a school or district will be added to that school and district's cohort.*
5. *Only students who transfer to another diploma granting school or district will be removed from a school's or district's cohort.*
6. *Only students attaining a regular diploma within four years are counted as graduates in the cohort graduation rate. Students attaining a regular diploma in more than four years will be counted as graduates in the extended year cohort graduation rate.*
7. *A student's cohort designation shall not be reassigned after its initial determination.*
8. *The cohort graduation rate is valid.*

A-2. When will this new rate be implemented?

In accordance with federal mandates, the new methodology will be used to calculate graduation rates beginning in September 2011.

OSSE will report on the graduation rate for the cohort of students who entered high school in 2007-2008; these are the students who were expected to graduate in 2011. The numerator includes only regular high school diplomas earned in four years or less. Students earning adult high school diplomas, modified diplomas, extended diplomas, general educational development (GED) certificates, or other high school credentials will be included in the adjusted cohort (i.e., the denominator), but will not be included in the count of regular high school diplomas (i.e., the numerator).

OSSE is planning to report the four-year cohort rate on the 2011-2012 Adequate Yearly Progress reports required under the No Child Left Behind Act, and on the 2010-2011 school and district report cards.

A-3. How is the four-year cohort rate different from previously reported graduation rates?

Prior to the Class of 2011, the graduation rate calculation that the District of Columbia produced was based on a single year of data and reported as the number of graduates in a school year divided by the number of graduates plus the number of dropouts. The four-year cohort graduation rate will follow a set of entering high school students and determine the percentage that received a regular diploma within four years. Key differences between the old graduation rate and the new cohort rate are as follows:

- The four-year cohort graduation rate includes modified diplomas, extended diplomas, GEDs, and Adult High School diplomas in its calculation, but these students are included in the rate as non-graduates; the old graduation rate did not include these other outcomes in its calculation.
- The four-year cohort graduation rate looks at a single cohort of students and follows their progress over four school years; the old rate used only a single year of data on graduates and dropouts.

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- Students who graduate in three years or less will have their graduation “banked.” Their graduation will be reported in the year in which their cohort is expected to graduate.
 - The four-year cohort graduation rate takes into account students who transfer in and who transfer out of a particular school; the old rate looked at a single year of data and it did not reflect changes in enrollment over time.
 - The new rate is a measure of graduation within four years; the old rate had no time limit for students to complete their diploma.

A-4. Why 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. Does the four-year graduation rate include students who graduate in the summer after their fourth year of high school?

Yes. The District of Columbia will include students who graduate in the summer after their fourth year of high school among the cohort members who graduate in four years.

A-7. Will the District of Columbia produce any rate other than the four-year rate?

Yes. The District of Columbia will produce a five-year graduation rate in addition to the four-year rate. The first year in which the five-year rate will be produced will be 2012, which will be a five year rate for students who entered ninth grade for the first time in 2007.

B. Identifying the 9th Grade Cohort

The first step in calculating a cohort rate for the District of Columbia class of 2011 is to determine the group of students who entered 9th grade for the first time in 2007-2008. Using up to five years of data from the annual enrollment audit, OSSE has developed a preliminary database of first-time 9th grade students. In order to be included in this preliminary list, the student must appear on the 2007 enrollment audit final roster as a 9th grade student, and not be included on any enrollment audit roster as a 9th grade student from 2002-2006.

LEAs will have an opportunity to validate their preliminary 9th grade cohort prior to final calculations of the cohort graduation rate. LEAs will validate the cohort at the LEA level as well as for individual schools within the LEA. OSSE will validate the cohort at the state level.

C. Identifying Outcomes of Students

LEAs will be asked to provide outcomes for all students in the cohort. Possible outcomes include:

- Graduated with standard diploma
- Left with non-standard diploma (e.g. Certificate, GED)
- Transferred out of school
- Still enrolled (e.g. retained)
- Dropped out
- Passed away

Only students who graduate with a standard diploma will be counted as graduates in the calculation of the cohort graduation rate. All other outcomes, including GED programs and certificates of IEP, will not count as graduates.

C-1. 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).³

Students who transfer into the cohort (e.g. were not enrolled as 9th grade students in October of 2007) must be added to the cohort. This includes new 10th grade students in 2008, new 11th grade students in 2009, and new 12th grade students in 2010.

Students are added to the cohort if they appear on the official enrollment audit roster for the first time in that grade in the corresponding year. For instance, a student who appears in the 10th grade for the

³ 34 C.F.R. §200.19(b)(1)(ii)(B)(2)

first time on the 2008 enrollment audit roster, and who does not appear in as a high school student in any of the previous five years of enrollment audits, would be added to the cohort as a new 10th grade transfer.

LEAs will have an opportunity to validate transfer students prior to final calculations of the cohort graduation.

C-2. When a student transfers into a school, to which cohort will OSSE assign the student?

A student who transfers into a school will be assigned to the cohort in which the student started 9th grade for the first time. If that school is in a different LEA than the student's original school, the student will also be assigned to the cohort in that LEA that reflects the year in which the student started 9th grade for the first time.

If a student who has repeated a grade transfers into a school, the student will be assigned to the cohort in which the student started 9th grade for the first time based on the student's academic history (e.g. official transcript). 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.

C-3. If a student re-enrolls in a public high school after having dropped out⁴ of school for a period of time, how will OSSE count that student in the four-year or extended-year graduation rate?

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 will be deemed to have transferred into the receiving school and will 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 the five-year graduation rate, which the District of Columbia plans to implement beginning in 2012. As long as the student re-enrolls before OSSE 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.

⁴ Students may be categorized as “drop-outs” for purposes of data collection. However, pursuant to the District of Columbia's compulsory education laws, all school age students (5-18) must be in regular attendance at a school. Schools and local education agencies (LEA) have reporting responsibilities when a student is not in attendance; those obligations can be found in 5 DCMR ChA21.

C-4. Will OSSE 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.⁵ The school or LEA would need to maintain appropriate documentation of this transfer (see C-8).

C-5. Will OSSE 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 out. The school or LEA would need to maintain appropriate documentation of this transfer, including, but not limited, to the notice of intent to home school filed with OSSE.

C-6. Will OSSE 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 will 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. Otherwise, the student will not be considered a transfer and must remain in the cohort for purposes of calculating the four-year and extended-year graduation rate. As a second example, there are three charter schools that do not culminate in the award of a regular high school diploma – Next Step PCS, Carlos Rosario PCS, and LAYC YouthBuild PCS. If a student transfers into one of these three LEAs, the student will not be removed from the student’s original graduation cohort.

C-7. 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. Additionally, in order to be considered a transfer, the student must enroll in the educational program at the facility, not just be sent to the prison facility.

OSSE will release further guidance on the specific issue of incarcerated youth in 2011.

⁵ 34 C.F.R. §200.19(b)(1)(ii)(B)(1)

C-8. 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, the U.S. Department of Education requires a state, school or LEA to 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.⁶

For years **prior to 2011-2012**, OSSE will accept as transfers all students coded as such in their LEA student information systems.

If an LEA or school claim that a student transferred to another school or LEA in the District of Columbia, OSSE will use annual enrollment audit or other data to confirm these transfers. If the transfer within DC cannot be confirmed, the student will not be removed from the cohort.

Beginning with the **2011-2012 school year**, OSSE will expect LEAs and schools to maintain documentation as follows:

For transfers to another public school within the District of Columbia:

- That transfer will be documented in the Statewide Longitudinal Education Data Warehouse (SLED).
 - Schools and LEAs must implement withdrawal codes as required by OSSE.

For transfers to a private school⁷ in the District of Columbia or a transfer out-of-state, official written documentation may include:

- Request for students records from a receiving public or private high school;
- Request for student records from an educational program that culminates in a regular high school; or
- Written record of a response from an official in the receiving school or program acknowledging the student’s enrollment.

For transfers to home school, official written documentation may include:

- Letter of withdrawal or other written confirmation from the parent or guardian; or
- A copy of the Intent to Home School form accepted by OSSE.

A conversation with a parent or neighbor of a student, for instance, would not be considered official written documentation of any type of transfer.

OSSE will not collect all documentation for all transfer students. However, an LEA or school must be prepared to submit documentation to OSSE upon request.

⁶ 34 C.F.R. §200.19(b)(1)(ii)(B)(1)

⁷ A private school does not include a non-public institution for which the District of Columbia pays tuition.

C-9. If, after multiple attempts, an LEA cannot obtain official written documentation that a student has transferred out, may the LEA ask OSSE to 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. In the District of Columbia, this rule will apply starting with the 2011-2012 school year.

C-10. 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 country⁸, 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 federal regulations do not require written documentation to be "official" for a student who emigrates to another country because the U.S. Department of Education 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.

C-11. 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.⁹ 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.

⁸ 34 C.F.R. §200.19(b)(1)(ii)(B)

⁹ 34 C.F.R. §200.19(b)(1)(ii)(B)