

Under the Congressional Review Act, Congress has passed, and the President has signed, a resolution of disapproval of the accountability and State plans final regulations that were published on November 29, 2016 (81 FR 86076). Because the resolution of disapproval invalidates the accountability and State plan final regulations, the portions of this guidance document that rely on those regulations are no longer applicable. To the extent that this document addresses statutory requirements, however, it is unaffected by the resolution of disapproval.



EVERY STUDENT SUCCEEDS ACT HIGH SCHOOL GRADUATION RATE NON-REGULATORY GUIDANCE

January 2017

Contents

Introduction.....	6
SECTION A: DEFINITIONS.....	8
Four-year ACGR definition	8
A-1. What is the four-year ACGR?.....	8
A-2. Why must a State base its four-year ACGR on “first-time in grade 9” cohorts?.....	9
A-3. When do students enter a grade 9 cohort?	9
A-4. How must a State define student subgroup membership for purposes of calculating the ACGR?	9
A-5. May a State include students who graduate in the summer after their fourth year of high school in its four-year ACGR?.....	9
A-6. How should a State consider a student who graduates from high school with a regular high school diploma in less than four years in its ACGR?	10
A-7. How should a State count a student who graduates in more than four years with a regular high school diploma in its four-year ACGR?	10
A-8. How should a State calculate the four-year ACGR for schools in the State with grade configurations other than grades 9 through 12?	10
Extended-year ACGR definition.....	11
A-9. What is an extended-year ACGR?.....	11
A-10. May a State include students who graduate in more than four years with a regular high school diploma in an extended-year ACGR?.....	12
A-11. Must a State use an extended-year ACGR?.....	12
A-12. If a State uses an extended-year ACGR, must the State use the rate consistently across the State for reporting?.....	12
Regular high school diploma	13
A-14. May a general equivalency diploma, alternative diploma, certificate of attendance, or diploma based on meeting IEP goals be counted as a regular high school diploma?.....	13
A-15. Why is a diploma based on meeting a student’s IEP goals considered a lesser credential? 13	
State-defined alternate diploma	13
A-16. What is a State-defined alternate diploma for students with the most significant cognitive disabilities?.....	13
A-17. Is a State-defined alternate diploma the same as a diploma based on meeting a student’s IEP goals?.....	14
A-18. Who is eligible for a State-defined alternate diploma?.....	14
A-19. How must a State count students with the most significant cognitive disabilities who graduate with a State-defined alternate diploma in the four-year and extended-year ACGR?....	14
A-20. Is there a cap on the number or percentage of students with the most significant cognitive	

disabilities to whom a State may award a State-defined alternate diploma?	15
SECTION B. CALCULATING THE ACGR	15
Adjusting a cohort.....	15
B-1. How does a school or LEA “adjust” a cohort?.....	15
B-2. When may a school or LEA remove a student from a cohort?	16
B-3. What is the definition of a “transfer”?	16
B-4. When a student transfers into a high school, to which cohort should a school or LEA assign the student?.....	16
B-5. How may a school or LEA count a student who re-enrolls in a public high school after having dropped out of school for a period of time in the four-year or extended-year ACGR?...17	17
B-6. May a school or LEA count a student as a transfer if the student leaves a public high school and enrolls in a private school?.....	18
B-7. May a school or LEA consider a student to be a transfer if the student leaves a public high school to be homeschooled?.....	18
B-8. 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?.....	18
B-9. May a school or LEA consider a student to be a transfer if the student leaves a public high school to enter a prison or juvenile facility?.....	18
B-10. How must a school or LEA treat a student who has been detained and is awaiting adjudication?	19
Required documentation for adjusting a cohort.....	19
B-11. Why is written confirmation required before a student may be removed from a cohort? 19	19
B-12. What documentation is required to confirm that a student has transferred out--i.e., transferred to another high school or to an educational program from which the student is expected to receive a regular high school diploma or State-defined alternate diploma?.....	20
B-13. What documentation is required to confirm that a student has emigrated to another country?.....	20
B-14. What documentation is required to confirm that a student is deceased?	20
B-15. How can a school or LEA confirm the transfer of a migrant student?.....	21
B-16. 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?.....	21
B-17. How should a school or LEA count a student who has not graduated in four years with a regular high school diploma but has begun participation in postsecondary programs?.....	21
B-18. How must a student be counted in the ACGR if the student has not attended the same school for at least half of a school year?	21
SECTION C. IMPLEMENTATION AND REPORTING	22
Implementation	22
C-1. How must a State address the inclusion of the ACGR in its accountability system?	22
C-2. If a State offers a State-defined alternate diploma to an eligible student with the most	

significant cognitive disabilities, when must the State begin including in its ACGR calculations students with the most significant cognitive disabilities who receive a State-defined alternate diploma?	22
C-3. What are a State’s responsibilities for ensuring the quality of data used to calculate its ACGR?	23
C-4. In reporting the ACGR, how should a State and its LEAs address changes to the State’s requirements for awarding a regular high school diploma?	23
Reporting	24
C-5. When must LEAs and States publicly report the four-year ACGR and, if adopted by the State, any extended-year ACGR?	24
C-6. For which subgroups must LEAs and States disaggregate ACGR data?	24
C-7. May LEAs and States report an extended-year ACGR in place of the four-year ACGR? ..	24
C-8. Where must LEAs and States report ACGR data?	24
C-9. May LEAs and States include additional information about graduation rates on their annual report cards?	25
C-10. May LEAs and States “lag” reporting the ACGR to include in the ACGR students who graduate from a summer session immediately following the fourth year of high school in data reported on LEA and State report cards?	25
ATTACHMENT A	27
ATTACHMENT B	28
ATTACHMENT C	29
ATTACHMENT D	30
ATTACHMENT E	32

The U.S. Department of Education (Department) has determined that this guidance is significant guidance under the Office of Management and Budget's Final Bulletin for Agency Good Guidance Practices, 72 Fed. Reg. 3432 (Jan. 25, 2007). See www.whitehouse.gov/sites/default/files/omb/memoranda/fy2007/m07-07.pdf. Significant guidance is non-binding and does not create or impose new legal requirements. The Department is issuing this guidance to provide States, local educational agencies (LEAs), and schools with information to assist them in meeting their obligations under the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act of 2015 (ESSA).

This High School Graduation Rate *Non-Regulatory Guidance* supersedes the Department's guidance, entitled High School Graduation Rate *Non-Regulatory Guidance*, issued on December 22, 2008, for requirements that go into effect beginning with the 2017-2018 school year.

State educational agencies (SEAs) and LEAs must comply with Federal civil rights laws that prohibit discrimination based on race, color, national origin, sex, disability, and age. These laws include Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, the Equal Educational Opportunities Act, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act, and the Age Discrimination Act of 1975.

If you are interested in commenting on this guidance, please email us your comment at oese.guidance@ed.gov or write to us at the following address:

U.S. Department of Education
Office of Elementary and Secondary Education
400 Maryland Avenue, SW.
Washington, DC 20202

For further information about the Department's guidance processes, please visit www2.ed.gov/policy/gen/guid/significant-guidance.html.

Introduction

Student graduation from high school with a regular high school diploma is an important indicator of school success and one of the most significant indicators of student college and career readiness. In addition, there are substantial economic benefits to high school completion. For example, according to the U.S. Department of Education's National Center for Education Statistics (NCES), the employment rate for young adults who had completed high school (67 percent) was higher than the employment rate for those who had not finished high school (51 percent) in 2015. Data for 2014 also show that the median annual earnings of young adult high school completers (\$30,000) was 20 percent higher than the median annual earnings of those without a high school credential (\$25,000).¹

The national ACGR for public high school students increased to 83.2 percent in 2014-15 according to data from the National Center for Education Statistics. Though gaps between reported subgroups of students persist, the ACGR increased for all reported subgroups of students between 2010-11 and 2014-15, and gaps between White students and Black, Hispanic and American Indian/Alaska Native students narrowed.²

A uniform and accurate measure of the four-year high school graduation rate that is comparable across States and consistently reported over time is critical to understanding the successes and challenges for schools in ensuring that all students graduate from high school. This measure can promote accountability and reward success for high schools across the nation. Along with other ESEA requirements, this measure also supports the realization of ESEA Title I's purpose: to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.

Title I, Part A (Title I) of the ESEA, as amended by the ESSA,³ now includes requirements similar to those in the final regulations on calculating and reporting high school graduation rates published by the Department on October 29, 2008 (2008 regulations). (ESEA section 8101(23), (25), and (43)). The Department also published corresponding regulations implementing the statutory graduation rate requirements under the reauthorized ESEA on November 28, 2016. (34 C.F.R. § 200.34). These regulations replace the 2008 regulations.

Under the ESEA, each State and LEA must calculate and report on its annual report card a four-year adjusted cohort graduation rate (ACGR), disaggregated by subgroups. (ESEA section 1111(h)(1)(C)(iii)(II)). For its statewide accountability system under Title I, each State also must establish ambitious State-determined long-term goals, and measures of interim progress toward meeting the goals, for all students and for each subgroup of students for indicators including high school graduation rates. (ESEA section 1111(a)).

This non-regulatory guidance provides States, LEAs, and schools with information about how to implement the graduation rate requirements in the ESEA. Section A of this guidance clarifies

¹ NCES Conditions of Education: <https://nces.ed.gov/programs/coe>.

² Institute of Education Sciences: http://ies.ed.gov/whatsnew/pressreleases/10_17_2016.asp.

³ Throughout this document, unless otherwise indicated, citations to the ESEA refer to the ESEA, as amended by the ESSA.

the four-year ACGR definition and other key terms. Section B discusses requirements for calculating the ACGR. Section C identifies common issues related to implementation and reporting of the ACGR.

To promote high school graduation for all students, we encourage SEAs and LEAs to identify and implement supports and interventions for dropout prevention. Related intervention reports, practice guides, and reviews of individual studies are available at the Department's What Works Clearinghouse⁴ to help with such efforts. In addition, information about the implementation of specific dropout prevention strategies for at-risk students is available through a series of issue briefs based on the Department's *National Survey on High School Strategies Designed to Help At-Risk Students Graduate*.⁵

⁴ See "Path to Graduation" at <http://ies.ed.gov/ncee/wwc/>.

⁵ See "High Schools" link at www.ed.gov/about/offices/list/opepd/ppss/reports-high-school.html.

SECTION A: DEFINITIONS

Four-year ACGR definition

A-1. What is the four-year ACGR?

The four-year ACGR is the number of students who graduate from high school⁶ in four years with a regular high school diploma, plus all students with the most significant cognitive disabilities who are assessed using an alternate assessment aligned with alternate academic achievement standards under section 1111(b)(2)(D) of the ESEA and who graduate with a State-defined alternate diploma, divided by the number of students who form the adjusted cohort for the graduating class.

The cohort is based on the number of students who enter grade 9 for the first time adjusted by adding into the cohort any student who transfers in later during grade 9 or during the next three years and subtracting any student from the cohort who transfers out, emigrates to another country, transfers to a prison or juvenile facility, or dies during that same period. (See Attachment A and B for more information on calculating the four-year ACGR; question A-5 for more information about the option to include summer graduates; see question A-8 for more information on how a State should calculate the four-year ACGR for schools with grade configurations other than grades 9 through 12; see question A-18 and Attachments B, D, and E for more information about cohort reassignment of students with the most significant cognitive disabilities expected to receive a State-defined alternate diploma; see question B-9 for specific conditions for counting a student who enters a prison or juvenile facility as a transfer; and see questions B-11 through B-16 for required documentation for adjusting a cohort.)

The following formula shows an example of the calculation of the four-year ACGR for the cohort entering grade 9 for the first time in the fall of the 2014-2015 school year and graduating by the end of the 2017-2018 school year. This example is for a State that offers a State-defined alternate diploma in the cohort for a four-year ACGR.

$$\begin{array}{c} \text{(Number of cohort members who earned a regular high school diploma} \\ \text{by the end of the 2017-2018 school year} \\ \text{plus} \\ \text{Number of students with the most significant cognitive disabilities originally in} \\ \text{or reassigned to the cohort assessed using an alternate assessment aligned} \\ \text{with alternate academic achievement standards who graduate with a State-defined alternate} \\ \text{diploma by the end of the 2017-2018 school year)} \end{array}$$

$$\begin{array}{c} \text{(Number of first-time grade 9 students in fall 2014 (starting cohort)} \\ \text{plus} \\ \text{Number of students who transfer in during school years 2014-2015, 2015-2016,} \end{array}$$

⁶ ESEA defines a “high school” as a secondary school that grants a diploma, as defined by the State, and includes, at least, grade 12. (ESEA section 8101(28)).

2016-2017, and 2017-2018 and any cohort reassignments of students expected to receive a State-defined alternate diploma

minus

Number of students who transfer out, emigrate to another country, transfer to a prison or juvenile facility⁷, or die during school years 2014-2015, 2015-2016, 2016-2017, and 2017-2018)

A-2. Why must a State base its four-year ACGR on “first-time in grade 9” cohorts?

Cohort-based graduation rates are most accurate if each student is assigned to a single cohort formed when the student enters grade 9 for the first time. A single cohort assignment for each student ensures that each student is counted once, and only once, in a four-year ACGR. Without a single cohort assignment when a student entered grade 9 for the first time, a student who later repeated a grade might be included in two separate cohorts of students—the class in which the student originally started grade 9 and the class for the next year’s grade 9 cohort. Further, unless the student skipped a grade later in high school or caught up with his or her original cohort in some other manner, that student would not graduate within four years of first starting grade 9. Therefore, to ensure a meaningful measure of a four-year ACGR, the cohort should be based on students who are first-time grade 9 students.

A-3. When do students enter a grade 9 cohort?

The students who form a grade 9 cohort are first-time students in grade 9 enrolled in the high school no later than the date by which student membership data is collected annually by the SEA for submission to the Department’s NCES (i.e., on or about October 1). (ESEA section 8101(25)(A)(i); 34 C.F.R. § 200.34(a)(2)).

A-4. How must a State define student subgroup membership for purposes of calculating the ACGR?

In some cases, a student who is part of one subgroup as a student in grade 9 may no longer be part of that subgroup as a student in grade 12 (e.g., a student might be an English learner (EL) upon entering high school but exit EL status prior to grade 12). For children with disabilities, as defined in 34 C.F.R. § 300.8, English learners, children who are homeless (as defined in 34 C.F.R. § 200.30(f)(1)(ii)), and children who are in foster care (as defined in 34 C.F.R. § 200.30(f)(1)(iii)), a State must count a student in his or her respective subgroup cohort(s) for the ACGR for each subgroup the student was a part of at any time during the cohort period. (34 C.F.R. § 200.34(e)(2)).

A-5. May a State include students who graduate in the summer after their fourth year of high school in its four-year ACGR?

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. (ESEA

⁷ See question B-9 for specific conditions for counting a student who enters a prison or juvenile facility as a transfer.

section 8101(25)(A)(ii); 34 C.F.R. § 200.34(c)(1)). Including students who graduate in the summer after their fourth year of high school as graduates in the ACGR recognizes the efforts of LEAs and schools that provide added support to help students graduate from high school. However, the inclusion of such students in the ACGR may not delay reporting the ACGR for that school year. (34 C.F.R. § 200.34(e)(3)). (See question C-5 for more information on reporting timelines).

A-6. How should a State consider a student who graduates from high school with a regular high school diploma in less than four years in its ACGR?

The four-year ACGR must consider a student who graduates from high school with a regular high school diploma in less than four years by counting the student in his or her original grade 9 cohort and, following the student’s graduation, including the student in the numerator for the student’s original grade 9 cohort. (ESEA section 8101(25)(A)(ii); 34 C.F.R. § 200.34(c)(1)). For example, a student who enters grade 9 for the first time in the 2014-2015 school year and graduates in three years would be included in the cohort of students expected to graduate in the 2017-2018 school year even though that student received his or her diploma at the end of the 2016-2017 school year. Effectively, the student’s graduation information is “banked” for one year until his or her cohort completes four years of high school at the end of the 2017-2018 school year.

A-7. How should a State count a student who graduates in more than four years with a regular high school diploma in its four-year ACGR?

A student who graduates in more than four years with a regular high school diploma is a non-graduate and may not be included as a graduate in a State’s four-year ACGR. A State must include such a student in the denominator of the four-year ACGR and may not include the student in the numerator because the student did not graduate in four years or less with a regular high school diploma. A State may not remove such a student from the cohort or assign the student to a different cohort when calculating the four-year ACGR. However, as explained in question A-10, a State may count such a student as a graduate in an extended-year ACGR if the State chooses to use such a graduation rate and the student graduates with a regular high school diploma during that time period.

In addition, under certain circumstances, a State may count a student with the most significant cognitive disabilities who graduates with a State-defined alternate diploma in the cohort for a four-year ACGR within the time period for which the State ensures the availability of a free appropriate public education under section 612(a)(1) of the Individuals with Disabilities Education Act (IDEA). (See question A-19 for more information on this exception).

A-8. How should a State calculate the four-year ACGR for schools in the State with grade configurations other than grades 9 through 12?

The ACGR is calculated only for the grades included in a high school. The cohort for the ACGR must be calculated for the earliest high school grade students attend no later than the date by which student membership data must be collected annually by SEAs for submission to the Department’s NCES (i.e., on or about October 1). (ESEA section 8101(25)(D)(i); 34 C.F.R. § 200.34(a)(2)-(3)). For example, if a high school has only grades 10-12, the State would

calculate the graduation rate for the high school using a three-year ACGR that would include only grades 10-12. The adjusted cohort would consist of first-time grade 10 students in a given year at the high school plus any students who transfer into the cohort during the next three years, minus any students who transfer out, emigrate to another country, transfer to a prison or juvenile facility, or die during the three years. The three-year ACGR would be calculated by dividing the number of students who receive a regular high school diploma in three years or less (plus the number of students with the most significant cognitive disabilities who graduate with a State-defined alternate diploma) by the adjusted cohort.

For schools with a grade 12 that have more than four grades (e.g., schools with grades K through 12 or 7 through 12), a State would calculate the four-year ACGR in the same manner that the State calculates the four-year ACGR for high schools with four grades (i.e., using only grades 9-12 in the school). That is, the State would base the cohort on first-time grade 9 students and follow the procedure identified in question A-1 above.

Extended-year ACGR definition

A-9. What is an extended-year ACGR?

An extended-year ACGR is an ACGR calculated to include students who graduate from high school in one or more additional years beyond their cohort’s original four years in high school. For example, for a given year, a five-year ACGR is the number of students who receive a regular high school diploma five years after their cohort started grade 9 divided by the adjusted cohort of students who started grade 9 five years earlier.

Calculation of an extended-year ACGR follows the same rules as calculation of the four-year ACGR. (See question A-1 for more information on rules for the calculation of the four-year ACGR and Attachment C and D for more information on calculating the four-year ACGR). The following example builds on the example provided in question A-1 to show an example of the calculation of a five-year ACGR for the cohort entering grade 9 for the first time in the fall of the 2014-2015 school year and graduating five years later at the end of the 2018-2019 school year. This example is for a State that offers a State-defined alternate diploma in the cohort for a four-year ACGR.

(Numerator in the four-year ACGR
 plus
 the number of students from the cohort
 who earned a regular high school diploma by the end
 of the 2018-2019 school year)

(Denominator in the four-year ACGR
 plus
 Number of students who transferred in during the 2018-2019 school year and any students
 expected to receive a State-defined alternate diploma who were reassigned to the cohort
 minus
 Number of students who transferred out, emigrated to another country,

transferred to a prison or juvenile facility⁸, or died during the 2018-2019 school year)

A-10. May a State include students who graduate in more than four years with a regular high school diploma in an extended-year ACGR?

Yes. In addition to the four-year ACGR, a State may use an extended-year ACGR that takes into account students who graduate with a regular high school diploma in more than four years. A State also may use multiple extended-year ACGRs to separately account for students who graduate in different numbers of years (e.g., a five-year and a six-year ACGR). (34 C.F.R. § 200.34(d)(2)). The option to use an extended-year ACGR allows a State to give its LEAs and schools credit for successfully graduating students who take longer than four years to graduate high school with a regular high school diploma. However, a State may not use an extended-year ACGR only for students in one or more particular subgroups (e.g., a five-year ACGR only for students with disabilities). (ESEA section 1111(h)(1)(C)(iii)(II)).

In calculating an extended-year ACGR, in addition to counting students who receive a regular high school diploma, under certain circumstances, a State may count a student with the most significant cognitive disabilities who graduates with a State-defined alternate diploma in the cohort for an extended-year ACGR even if the student graduates in additional years beyond the time period captured by the extended-year ACGR. See question A-18 for more information on this exception.

A-11. Must a State use an extended-year ACGR?

No. The use of an extended-year ACGR is voluntary. However, if a State chooses to calculate and use for Title I accountability purposes one or more extended-year ACGRs, the State and its LEAs must report separately from the four-year ACGR, beginning with the first year for which the State calculates an extended-year ACGR, each extended-year ACGR used by the State. (ESEA section 1111(h)(1)(C)(iii)(II); 34 C.F.R. § 200.34(e)(1)(i)).

A-12. If a State uses an extended-year ACGR, must the State use the rate consistently across the State for reporting?

Yes. A State must clearly define and consistently calculate its four-year ACGR and any extended-year ACGR it chooses to use for Title I purposes, including reporting and accountability, across all LEAs and schools in the State. Additionally, a State also may choose to calculate a graduation rate for other State and local purposes that differs from the requirements in section 8101(23) and (25) of the ESEA. Only the four-year ACGR, and any extended-year ACGR used by the State, may be used to meet Title I requirements, including reporting. (ESEA section 1111(h)(1)(C)(iii)(II)).

⁸ See question B-9 for specific conditions for counting a student who enters a prison or juvenile facility as a transfer.

Regular high school diploma

A-13. How is a “regular high school diploma” defined?

For the purposes of calculating the ACGR, a “regular high school diploma” is the standard high school diploma awarded to the preponderance of students in a State that is fully aligned with the State’s standards and does not include a general equivalency diploma, certificate of completion, certificate of attendance, or any other similar or lesser credential, such as a diploma based on meeting Individualized Education Program (IEP) goals. The term “regular high school diploma” also includes any “higher diploma” that is awarded to students who complete requirements above and beyond what is required for a regular high school diploma. (ESEA section 8101(43); 34 C.F.R. § 200.34(c)(2)).

A-14. May a general equivalency diploma, alternative diploma, certificate of attendance, or diploma based on meeting IEP goals be counted as a regular high school diploma?

No. A State may not include a recognized equivalent of a diploma as a regular high school diploma for the purpose of calculating the four-year or extended-year ACGR. (ESEA section 8101(43)(B); 34 C.F.R. § 200.34(c)(2)). Thus, students who graduate with a credential other than a regular high school diploma, such as a general equivalency diploma, modified diploma, certificate of completion, certificate of attendance, or a diploma based on meeting a student’s IEP goals, may not be counted in the numerator as having earned a regular high school diploma, but must be included in the denominator of the four-year and extended-year ACGR. (See A-18 for how a State may count a student who graduates with a State-defined alternate diploma).

A-15. Why is a diploma based on meeting a student’s IEP goals considered a lesser credential?

Under 34 C.F.R. § 300.320(a)(2), each child’s IEP must include a statement of measurable annual goals, including academic and functional goals, designed to: (1) meet the child’s needs that result from the child’s disability, to enable the child to be involved in and make progress in the general education curriculum, and (2) meet each of the child’s other educational needs that result from the child’s disability. Although the use of standards-based IEPs has greatly expanded, IEP goals cannot serve as a proxy for determining whether a student has met a State’s grade-level academic content standards. Therefore, a diploma based on meeting IEP goals will not provide a sufficient basis for determining that the student has met a State’s grade-level academic content standards; rather, it will only demonstrate that the student has attained his or her IEP goals during the annual period covered by the IEP. Therefore, a diploma based on attainment of IEP goals, regardless of whether the IEP goals are fully aligned with a State’s grade-level content standards, should not be treated as a regular high school diploma.

State-defined alternate diploma

A-16. What is a State-defined alternate diploma for students with the most significant cognitive disabilities?

A State-defined alternate diploma is a diploma that: (1) is standards-based, and (2) aligned with the State’s requirements for the regular high school diploma. Under the ESEA, a State has the

option to offer a State-defined alternate diploma to an eligible student with the most significant cognitive disabilities and count the student as a graduate in the State's ACGR if the student receives the State-defined alternate diploma within the time period for which the State ensures the availability of a free appropriate public education (FAPE) under section 612(a)(1) of the IDEA. (ESEA section 8101(23)(A)(ii)(I)(bb), (25)(A)(ii)(I)(bb); 34 C.F.R. § 200.34(a)(1)(ii), (c)(3), (d)(1)).

A-17. Is a State-defined alternate diploma the same as a diploma based on meeting a student's IEP goals?

No. As reflected in question A-16 above, a State-define alternate diploma must be both standards-based and aligned with the State's requirements for a regular high school diploma. Therefore, a diploma based solely on meeting a student's IEP goals cannot meet the definition of a State-defined alternate diploma.

A-18. Who is eligible for a State-defined alternate diploma?

Only a student with the most significant cognitive disabilities is eligible for a State-defined alternate diploma, and only if the student has taken the State's alternate assessment aligned with alternate academic achievement standards under section 1111(b)(2)(D) of the ESEA and met any other State-defined requirements. (ESEA section 8101(23)(A)(ii)(I)(bb), (25)(A)(ii)(I)(bb); 34 C.F.R. § 200.34(c)(3)).

A-19. How must a State count students with the most significant cognitive disabilities who graduate with a State-defined alternate diploma in the four-year and extended-year ACGR?

In a State that offers a State-defined alternate diploma, all students must be included in the cohort of entering first-time students in grade 9. (ESEA section 8101(23)(A)(i), (25)(A)(i); 34 C.F.R. § 200.34(a)(2)). Students with the most significant cognitive disabilities who are eligible for a State-defined alternate diploma must remain in the cohort through their fourth year of high school. (34 C.F.R. § 200.34(b)(5)(i)). A State may remove students with the most significant cognitive disabilities who are eligible for a State-defined alternate diploma from the students' original cohort if the students do not graduate in four years when their original cohort completes grade 12, provided the student remains in school working toward the State-defined alternate diploma. Students with the most significant cognitive disabilities who exit with no credentials (i.e., neither a regular high school diploma nor a State-defined alternate diploma) prior to the end of grade 12 must remain in the denominator for the students' grade 9 cohort.

If students with the most significant cognitive disabilities have not graduated or exited with credentials (e.g., regular high school diploma, State-defined alternate diploma) at the time their four-year cohort graduates, a State should remove the students from their original four-year cohort and reassign the students to the four-year cohort graduating in the year of their exit. Such students will then appear in the denominator of the new cohort assignment and, if they receive a State-defined alternate diploma, in the numerator for that cohort's four-year ACGR. The Department recommends that a State code these students within their data systems as potential State-defined alternate diploma recipients. This will ensure that these students are accounted for between their original grade 9 cohort's graduation and the students' actual

graduation or exit from high school. Reassignment of a student to a cohort must take place within the time period for which the State ensures the availability of FAPE for students with disabilities under section 612(a)(1) of the IDEA. At the time of exit, students must be included in the denominator regardless of how they exit (e.g., with a State-defined alternate diploma or certificate of attendance). A student who receives a State-defined alternate diploma is counted in the numerator. A student who receives any other credential or drops out must be counted in the denominator only. A student reassigned to a new cohort will be included in any extended-year ACGR rate associated with the student's new four-year cohort. (See Attachment E). A student with the most significant cognitive disability who is eligible to receive a regular high school diploma must remain in his or her original cohort for the calculation of the ACGR; only students who receive a State-defined alternate diploma may be reassigned to a different cohort. (34 C.F.R. § 200.34(a)(1)(ii), (b)(5)).

A-20. Is there a cap on the number or percentage of students with the most significant cognitive disabilities to whom a State may award a State-defined alternate diploma?

No. There is no specific cap on the number or percentage of students with the most significant cognitive disabilities to whom a State may award a State-defined alternate diploma. However, under section 1111(b)(2)(D) of the ESEA, a State must ensure that the total number of students assessed in each subject using an alternate assessment aligned with alternate academic achievement standards does not exceed one percent of the total number of students in the State who are assessed in each subject. (Note: there is no similar cap on the percentage of students in an LEA who may be assessed using an alternate assessment aligned with alternate academic achievement standards.) To be eligible for a State-defined alternate diploma, a student must have taken the State's alternate assessment aligned with alternate academic achievement standards. While there is no cap on who may receive a State-defined alternate diploma, because of the connection to the alternate assessment aligned with alternate academic achievement standards under section 1111(b)(2)(D) of the ESEA, the Department expects that, in general, no more than one percent of students graduating in a State in a given year would receive a State-defined alternate diploma.

SECTION B. CALCULATING THE ACGR

Adjusting a cohort

B-1. How does a school or LEA “adjust” a cohort?

The four-year ACGR follows a cohort, or a group of students, who begin as first-time grade 9 students 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 student transferring into the cohort and by subtracting any student who, during the years covered by the rate, transferred out, emigrated to another country, transferred to a prison or juvenile facility, or died. (8101(23), (25); 34 C.F.R. § 200.34(b)). Additional requirements for adjusting a cohort apply to students eligible to receive a State-defined alternate diploma, which are described in question A-18.

B-2. When may a school or LEA remove a student from a cohort?

Only a student who transfers out and enrolls in another high school or in an educational program (including a program in a prison or juvenile facility) from which the student is expected to receive a regular high school diploma or State-defined alternate diploma that meets the requirements described in question A-16, emigrates to another country, or dies may be removed from a high school's or LEA's cohort.

Before removing a student from a cohort, a school or LEA must obtain confirmation in writing that the student transferred out, emigrated, transferred to a prison or juvenile facility, or died. A student may not be removed from the cohort for any other reason (see question A-18 for how to include students eligible to receive a State-defined alternate diploma in the cohort). Thus, a State must ensure that its LEAs and schools ensure that a student who drops out of high school is not deemed a transfer for purposes of calculating the ACGR; rather, the student must remain in the adjusted cohort—that is, the denominator of the graduation rate calculation. (ESEA section 8101(23)(B) and (25)(B); 34 C.F.R. § 200.34(b)(3)). Under the ESEA, a State is not required to track and report on the dropout rate, although data on dropouts is collected by the Department independently of these requirements.

B-3. What is the definition of a “transfer”?

A *transfer into* a cohort occurs when a student enrolls in a high school 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 high school and enrolls in another high school or in an educational program from which the student is expected to receive a regular high school diploma or State-defined alternate diploma that meets the requirements described in question A-16. A State may not count as a transfer a student who is retained in grade, enrolls in a general equivalency diploma program, is transferred to a prison or juvenile facility that does not provide (or from which the student is not expected to receive) a regular high school diploma or a State-defined alternate diploma that meets the requirements described in question A-16, or leaves high school for any other reason in the four-year or extended-year graduation rate; such students must remain in the adjusted cohort (i.e., must be included in the denominator of the graduation rate for that cohort). (ESEA section 8101(23)(C) and (25)(C); 34 C.F.R. § 200.34(b)(2)-(3)).

A *transfer into* a cohort occurs when a student enrolls in a high school 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 high school and enrolls in another high school or in an educational program from which the student is expected to receive a regular high school diploma or State-defined alternate diploma that meets the requirements described in question A-16. A State may not count as a transfer a student who is retained in grade, enrolls in a general equivalency diploma program, is transferred to a prison or juvenile facility that does not provide (or from which the student is not expected to receive) a regular high school diploma or a State-defined alternate diploma that meets the requirements described in question A-16, or leaves high school for any other reason in the four-year or extended-year graduation rate; such students must remain in the adjusted cohort (i.e., must be included in the denominator of the graduation rate for that cohort). (ESEA section 8101(23)(C) and (25)(C); 34 C.F.R. § 200.34(b)(2)-(3)).

B-4. When a student transfers into a high school, to which cohort should a school or LEA

assign the student?

A student who transfers into a high school must be assigned to the cohort in which the student started grade 9 for the first time. This information should be easily obtained for the vast majority of students who transfer into a high school. A State's longitudinal data system will provide this information for students who transfer between high 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 high school, the student must be assigned to the cohort in which the student started grade 9 for the first time. Unless the student skipped a grade later in high school or caught up with the original cohort in some other manner, that student could not graduate within four years of starting grade 9.

B-5. How may a school or LEA count a student who re-enrolls in a public high school after having dropped out of school for a period of time in the four-year or extended-year ACGR?

For a State to meet the requirements for calculating the ACGR, a State will need 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 student in grade 9 in the 2014-2015 school year drops out after 10th grade at the end of the 2015-2016 school year, and then re-enrolls into a different high school in 2017-2018, that student may be deemed to have transferred into the receiving high school and should be assigned to the cohort in which the student was a member when he or she started grade 9 for the first time (the 2014-2015 school year). Unless the student skipped a grade later in high school or caught up with the original cohort in some other manner, that student could not graduate within four years of starting grade 9, 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 dropout in the first high school and, at that point, the student would be removed from the first high school's cohort. The student record system should be adjusted accordingly.

B-6. May a school or LEA count a student as a transfer if the student leaves a public high school and enrolls in a private school?

It depends. If a student leaves a public high school to enroll in a private school at the discretion of the student's parents, that student would be considered a transfer out. (ESEA section 8101(23)(C) and (25)(C); 34 C.F.R. § 200.34(b)(3)(i)). (See question B-12 regarding the official written documentation required to count a student as a transfer in calculating the four-year or extended-year graduation rate.) However, if a student with a disability is placed in a private school by an LEA in order to meet the student's special education and related services needs under the IDEA, the LEA remains responsible for ensuring that the student receives a free appropriate public education while placed in the private school. (34 C.F.R. § 300.146). In this situation, the student may not be considered a transfer out.

B-7. May a school or LEA consider a student to be a transfer if the student leaves a public high school to be homeschooled?

Yes. A student who leaves a public high school to be homeschooled would be considered to be a transfer if the homeschool program meets the State's requirements for compulsory attendance or other State laws or policies applicable to homeschools. Some students who leave a public high school to be homeschooled may continue to take courses from the public high school. If that student is considered by the State to be primarily a homeschooled student and the State has appropriate documentation of the transfer, then the student would not be required to be included in the adjusted cohort graduation rate calculation for the public high school. (See question B-12 for examples of official written documentation needed to confirm that a student has transferred to a homeschool program).

B-8. 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 is one from which a student can expect to receive a regular high school diploma or State-defined alternate diploma that meets the requirements described in question A-16. For instance, if a student leaves a public high school because the student is placed in a dropout recovery center, the student would be a transfer if the center provides, and the student enrolls in, an educational program from which the student is expected to receive a regular high school diploma (as defined in ESEA section 8101(43)) or State-defined alternate diploma that meets the requirements described in question A-16. Otherwise, the student may not be considered a transfer and must remain in the sending school's adjusted cohort for purposes of calculating the four-year and extended-year graduation rates.

B-9. May a school or LEA consider a student to be a transfer if the student leaves a public high school to enter a prison or juvenile facility?

A student who leaves high school to enter a prison or juvenile facility may be considered a transfer only after an adjudication of delinquency and if the student is in a prison or juvenile facility that has a school (as defined under State law) or provides an educational program from

which the student is expected to receive a regular high school diploma or State-defined alternate diploma that meets the requirements described in question A-16 during the period in which the student is assigned to the prison or juvenile facility. If the facility does not have a school or educational program, or provides an educational program that does not offer a regular high school diploma or State-defined alternate diploma that meets the requirements described in question A-16, 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. Further, if a student is not expected to be in a facility for sufficient duration to receive a regular high school diploma or State-defined alternate diploma that meets the requirements described in question A-16 (i.e., if the student will leave the facility prior to his or her high school graduation and therefore is expected to return to the student's sending high school or another high school), the student may not be removed from the cohort of the sending school. (34 C.F.R § 200.34(b)(3)(iii)).

B-10. How must a school or LEA treat a student who has been detained and is awaiting adjudication?

A student who is in a prison or in a juvenile facility awaiting a hearing or release and not yet adjudicated as delinquent may not be removed from the cohort of the sending school or LEA. Instead, the school or LEA must wait until the student has received such adjudication and determined that the student will transfer to a facility that has a school or educational program from which the student can expect to receive a regular high school diploma or State-defined alternate diploma that meets the requirements described in question A-16 during the time period in which the student is assigned to the prison or juvenile facility.

If a student's cohort graduates while the student is awaiting adjudication, and the student has not met the graduation requirements for the State, the student must remain in the cohort of the sending school but cannot be counted as a graduate. However, such student could be counted in an extended-year graduation rate, if extended-year rates are adopted by the State, for the school or facility to which the student is assigned if the student completes his or her graduation rate requirements in additional years beyond the student's fourth year. (34 C.F.R § 200.34(b)(3)(iii)).

Required documentation for adjusting a cohort

B-11. Why is written confirmation required before a student may be removed from a cohort?

Before a student is removed from a cohort, a school or LEA must have written confirmation that a student has transferred, emigrated to another country, transferred to a prison or juvenile facility, or died. (ESEA section 8101(23)(B) and (25)(B); 34 C.F.R. § 200.34(b)(3)). Written documentation facilitates audits and, thus, will help ensure that a school, LEA, and State have an accurate measure of graduation rate. Often a State and LEA have classified as a transfer a student who leaves a high school for any reason, even if the student does not enroll in another school or in an educational program from which the student can expect to receive a regular high school diploma or State-defined alternate diploma that meets the requirements described in question A-16.

Unless a school or LEA can confirm in writing that a student has transferred out, emigrated to

another country, transferred to a prison or juvenile facility, or died, the school or LEA must continue to consider that student to be in the adjusted cohort for purposes of calculating the four-year or extended-year graduation rate.

B-12. What documentation is required to confirm that a student has transferred out--i.e., transferred to another high school or to an educational program from which the student is expected to receive a regular high school diploma or State-defined alternate diploma?

To confirm that a student transferred out, a school or LEA must have “official written documentation” that a student has transferred to another high school or to an educational program from which the student is expected to receive a regular high school diploma or State-defined alternate diploma that meets the requirements described in question A-16. (ESEA section 8101(23)(C)(ii) and (25)(C); 34 C.F.R. § 200.34(b)(3)(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 offers a regular high school diploma or alternate diploma that meets the requirements described in question A-16); 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 homeschool notification or compulsory attendance requirements in the State; or any other written documentation accepted in the State to verify a child is homeschooled. A conversation with a parent or neighbor of a student, for instance, would not be considered official written documentation of a transfer.

B-13. 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 but need not obtain official written documentation. (ESEA section 8101(23)(B) and (25)(B); 34 C.F.R. § 200.34(b)(3)(ii)). 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.

B-14. 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. (ESEA section 8101(23)(B) and (25)(B); 34 C.F.R. § 200.34(b)(3)(iv)). A letter from a parent or an obituary or death notice is sufficient documentation. Official written documentation of a student’s death, such as a death certificate, is not necessary.

B-15. How can a school or LEA confirm 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 used to by States and LEAs in documenting the enrollment of migratory students, as defined in section 1309 of the ESEA, in another school or in an educational program from which a student is expected to receive a regular high school diploma or State-defined alternate diploma that meets the requirements described in question A-16.

B-16. 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 from the cohort a student 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 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 accountability 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 on how to properly code student transfers.

B-17. How should a school or LEA count a student who has not graduated in four years with a regular high school diploma but has begun participation in postsecondary programs?

Some students participate in dual or concurrent enrollment programs, meaning a program offered by a partnership between an institution of higher education and an LEA, in which the student enrolls in postsecondary courses and earns credits that count toward the completion of a postsecondary degree prior to the student’s exit from high school. (ESEA section 8101(15)). In order to take advantage of these opportunities, a student participating in these programs often remains in high school beyond a fourth year and exits with a high school diploma and college credit. In the case of those students who remain in high school beyond the fourth year as part of a dual or concurrent enrollment program in order to receive college credit, a State may count those students as graduates in the four-year ACGR along with other members of their four-year cohort, provided the students have, by the end of the student’s fourth year, completed all the requirements that would be necessary to receive a regular high school diploma in the State (e.g., the minimum courses required or other requirements established by the State for all students). A student may *not* be counted as a graduate in the four-year ACGR if the student has not met all the requirements to receive a regular high school diploma (but could be included in an extended-year ACGR, if adopted by the State, once the student receives a regular high school diploma). A student should *not* be counted as graduating in four years if the postsecondary courses the student is taking are not offered through a partnership program as described in ESEA section 8101(15).

B-18. How must a student be counted in the ACGR if the student has not attended the

same school for at least half of a school year?

A student who transfers into a school must be assigned to the cohort corresponding to the student's first year in grade 9 and must be included in the school's ACGR calculation. A high school student who has exited high school without a regular high school diploma or State-defined alternate diploma and without transferring to another high school that grants a regular high school diploma or State-defined alternate diploma that meets the requirements described in question A-16 during such school year, and who has not attended the same school within an LEA for at least half of a school year, must be included in the ACGR for the purposes of reporting on State and LEA report cards. (ESEA section 1111(c)(4)(F)). For the report cards, an SEA has options for how to include such a student in ACGR calculations at the school level. An SEA may calculate the graduation rate indicator by assigning such student to:

- The high school at which such student was enrolled for the greatest proportion of school days while enrolled in grades 9 through 12, or
- The high school in which the student was most recently enrolled.

While the SEA may choose either option described above for including those students in its calculations, it must use the same approach for all LEAs and schools in the State. (ESEA section 1111(c)(4)(F); 34 C.F.R. § 200.34(f)).

SECTION C. IMPLEMENTATION AND REPORTING

Implementation

C-1. How must a State address the inclusion of the ACGR in its accountability system?

To receive Title I funds, each State must submit to the Secretary a consolidated State plan or an individual Title I program plan, and each such plan must describe the statewide accountability system the State will implement for Title I. (ESEA section 1111(a)). Each statewide accountability system must include ambitious State-designed long-term goals, including measurements of interim progress toward meeting goals for high school graduation rates, specifically the four-year ACGR, and, at the State's discretion, one or more extended-year ACGRs.⁹ (ESEA section 1111(c)(4)(A)). A State and its LEAs must annually calculate the four-year ACGR according to ESSA requirements beginning with ACGR data for the 2017-2018 school year and report the results no later than December 31, 2018; this includes calculating the ACGR for subgroups of children who are homeless and children who are in foster care. (34 C.F.R. § 200.30(e)).

C-2. If a State offers a State-defined alternate diploma to an eligible student with the most

⁹ Regulations regarding consolidated State plans and statewide accountability systems under Title I, Part A are available at <https://www.gpo.gov/fdsys/pkg/FR-2016-11-29/pdf/2016-27985.pdf>. The Department's State Template for the Consolidated State Plan Under the Every Student Succeeds Act is available on ED's website at <http://www2.ed.gov/policy/elsec/leg/essa/essa-consolidated-state-plan-final.docx> and the Department's State Assurances Template Under the Every Student Succeeds Act is available on ED's website at <http://www2.ed.gov/policy/elsec/leg/essa/essa-state-plan-assurances-final.docx>.

significant cognitive disabilities, when must the State begin including in its ACGR calculations students with the most significant cognitive disabilities who receive a State-defined alternate diploma?

If a State offers a State-defined alternate diploma to an eligible student with the most significant cognitive disabilities, the State must begin including students with the most significant cognitive disabilities who receive a State-defined alternate diploma in its ACGR calculations as soon as it has the data available to do so, but not earlier than ACGR data for the 2017-2018 school year. (34 C.F.R. § 200.34).

C-3. What are a State’s responsibilities for ensuring the quality of data used to calculate its ACGR?

Each State is responsible for ensuring the integrity and quality of its ACGR calculations and the data it uses for these calculations. A State addresses this responsibility by putting in place the policies, procedures, infrastructure, and internal controls necessary for collecting accurate data and correctly calculating the ACGR. Such policies, procedures, infrastructure, and internal controls may include:

- A fully operational data system for collecting and maintaining all required data;
- Clear business rules for ACGR calculations, such as clearly defined cohort start dates and rules for determining subgroup membership;
- Data quality checks for information collected and stored by the data system (e.g., for ensuring there are no duplicated student counts);
- Official documents related to submission or verification of data in the data system that LEAs are required to submit to the State;
- Guidance, information and tools for LEAs and schools to accurately collect and report in a timely manner data all required data (e.g., a State data dictionary, instructions for data entry, guidance regarding required documentation for removing students from a cohort); and
- Procedures for monitoring LEAs’ and schools’ reporting of ACGR data and maintenance of required documentation.

C-4. In reporting the ACGR, how should a State and its LEAs address changes to the State’s requirements for awarding a regular high school diploma?

A State and its LEAs must include ACGR data on their annual report cards regardless of any changes to the State’s requirements for earning a regular high school diploma. However, ACGR data are most useful to parents, educators, policymakers, and the public when the data can be compared across years. Certain changes, such as changes in a State’s requirements for earning a regular high school diploma, or a change to include in a State’s ACGR calculation students with the most significant cognitive disabilities who receive a State-defined alternate diploma, may affect the meaning of comparisons of the ACGR over time. As such, if a State makes a change that affects the meaning of its ACGR data, the State and its LEAs should report the ACGR data with transparent and understandable notes about the implications of the changes for the meaning and uses of the data.

Reporting

C-5. When must LEAs and States publicly report the four-year ACGR and, if adopted by the State, any extended-year ACGR?

Beginning with ACGR data for the 2017-2018 school year, LEAs and States must annually publicly report the four-year ACGR and, if adopted by the State, any extended-year ACGR on State and LEA report cards no later than December 31 for data for the immediately preceding school year (i.e., by December 31, 2018, for data from the 2017-2018 school year). (34 C.F.R. § 200.30(e) and § 200.31(e)). For any extended-year ACGR adopted by a State, LEAs and States must publicly report the extended-year ACGR separately, beginning with the first year a State uses the rate. (34 C.F.R. § 200.34(e)).

C-6. For which subgroups must LEAs and States disaggregate ACGR data?

LEAs and States must disaggregate the four-year ACGR and, if adopted by the State, any extended-year ACGR, for the following subgroups at the school, LEA, and State levels:

- Each major racial and ethnic group;
- Economically disadvantaged students;
- Children with disabilities;
- English learners;
- Children who are homeless; and
- Children who are in foster care.

(ESEA section 1111(h)(1)(C)(iii) and (h)(2)(C); 34 C.F.R. § 200.34(e)).

Disaggregation on report cards, however, is not required if the number of students in the subgroup is insufficient to yield statistically reliable information or the results would reveal personally identifiable information about a student. (34 C.F.R. § 200.30(f)(2)). Additionally, if a student belongs in more than one of the subgroups above, the student should be counted in each of those subgroups. The exception to this is in the case where a State defines its major racial and ethnic subgroup to include a Multicultural/Multiethnic/Multiracial/Other group (one of the possible major racial and ethnic groups). In that case, the student should only be counted in that subgroup and not in any other racial and ethnic subgroup (the student also would be counted in any other group to which the student belonged, such as English learner or children with disabilities subgroup).

C-7. May LEAs and States report an extended-year ACGR in place of the four-year ACGR?

No. If a State calculates an extended-year ACGR, LEAs and the State must calculate and report the extended-year ACGR separately from, and in addition to, the four-year ACGR. (ESEA section 1111(h)(1)(C)(iii)(II) and (h)(2)(C); 34 C.F.R. § 200.34(e)(4)).

C-8. Where must LEAs and States report ACGR data?

LEAs and States must report ACGR data, in the aggregate and disaggregated by subgroups, on their annual report cards and to the Department through the *EDFacts* Reporting System

(EDFacts) (ESEA section 1111(h)(1)(C)(iii)(II) and (h)(2)(C); 34 C.F.R. § 200.30(b)(2)(i)(C) and 200.31(b)(2)(i)(A)).

For report cards, LEAs and States must report the four-year ACGR and, if adopted by the State, any extended-year ACGR, for all students and required subgroups for each high school, for each LEA, and for the State (see question C-7 for more information about reporting the four-year and extended-year ACGRs). (ESEA section 1111(h)(1)(C)(iii) and (h)(2)(C); 34 C.F.R. § 200.34(e)). Additionally, LEAs and States must report the four-year ACGR and, if adopted by the State, any extended-year ACGR, in the overview section of their report cards for all students and disaggregated, at a minimum, for each major racial and ethnic group, economically disadvantaged students, children with disabilities, and English learners. (34 C.F.R. § 200.30(b)(2)(i)(C) and 200.31(b)(2)(i)(A)).

For EDFacts, a State must submit to the Department aggregated and disaggregated data for its four-year and, if adopted by the State, any extended-year ACGR via EDFacts, the centralized portal through which a State submits its education data to the Department (OMB collection 1810-0724). EDFacts populates the State’s Consolidated State Performance Report with these ACGR data.

C-9. May LEAs and States include additional information about graduation rates on their annual report cards?

Yes. LEAs and States may include on their annual report cards any other information, in addition to the required information, they deem appropriate. (ESEA section 1111(h)(1)(C)(xiv) and (h)(2)(D)). For example, an LEA or State may include information on the percentage of students who drop out of high school, the percentage of first-time grade 9 students who are promoted on time, the number of students graduating with a recognized equivalent of a diploma, or the number of students attaining career and technical certifications. Such information may help parents, educators, policymakers, and the public better understand the reported ACGR and, more generally, students’ college- and career-readiness.

C-10. May LEAs and States “lag” reporting the ACGR to include in the ACGR students who graduate from a summer session immediately following the fourth year of high school in data reported on LEA and State report cards?

No. In order to ensure that parents, educators, policymakers, and the public have timely access to comparable ACGR information, on-time reporting of the four-year ACGR and, if adopted by a State, any extended-year ACGR is required¹⁰. LEAs and States must report ACGR data on their report cards for the immediately preceding school year. A State may include summer graduates in its reporting of four-year and extended-year ACGRs on LEA and State report cards as long as the State can report that information on time (a State may report on time four-year and extended-year ACGRs without students enrolled in the summer session immediately following the fourth

¹⁰ A State and its LEAs may lag, however, for accountability purposes. For more information, see the regulations regarding consolidated statewide accountability systems under Title I, Part A, available at <https://www2.ed.gov/policy/elsec/leg/essa/index.html>. The Department’s non-regulatory guidance, Accountability Under Title I, Part A of the ESEA; Frequently Asked Questions, also is available at <https://www2.ed.gov/policy/elsec/leg/essa/index.html>.

year of high school and then later update the ACGR to include summer graduates). (34 C.F.R. § 200.34(e)(3)).

ATTACHMENT A

Calculating the four-year ACGR for the cohort of first-time grade 9 students formed in the 2017-2018 school year (SY) in a State without a State-defined alternate diploma

SY 2017-2018		SY 2018-2019		SY 2019-2020		SY 2020-2021	
First-time grade 9 students:	100	Adjusted SY 17-18 grade 9 cohort:	98	Adjusted SY 17-18 grade 9 cohort:	99	Adjusted SY 17-18 grade 9 cohort:	100
Dropouts:	5	Dropouts:	6	Dropouts:	7	Dropouts:	2
Transfers out:	10	Transfers out:	4	Transfers out:	5	Transfers out:	4
Transfers in:	8	Transfers in:	5	Transfers in:	6	Transfers in:	3
Died:	0	Died:	0	Died:	0	Died:	1
Emigrated:	0	Emigrated:	0	Emigrated:	0	Emigrated:	1
Earned regular HS diploma:	0	Earned regular HS diploma:	0	Earned regular HS diploma:	3	Earned regular HS diploma:	71
Cohort at end of SY 17-18:	98 (100-10+8)	Cohort at end of SY 18-19:	99 (98-4+5)	Cohort at end of SY 19-20:	100 (99-5+6)	Cohort at end of SY 20-21:	97 (100-4+3-1-1)
Four-year ACGR:	NA	Four-year ACGR:	NA	Four-year ACGR:	NA	Four-year ACGR:	76.2887% ((3+71)/97*100)

Notes:

The cohort size is adjusted at the end of each year by accounting for the number of students who transfer into or out of the cohort and students who die or emigrate.

The cohort size is NOT adjusted at the end of each year by accounting for the number of students who drop out of school.

Attachment B illustrates how to calculate the ACGR for students receiving the State-defined alternate diploma.

ATTACHMENT B

Calculating the four-year ACGR for the cohort of first-time grade 9 students formed in the 2017-2018 school year (SY) in a State with a State-defined alternate diploma (SDAD)

SY 2017-2018		SY 2018-2019		SY 2019-2020		SY 2020-2021	
First-time grade 9 students:	100	Adjusted SY 17-18 grade 9 cohort:	98	Adjusted SY 17-18 grade 9 cohort:	99	Adjusted SY 17-18 grade 9 cohort:	100
Dropouts:	5	Dropouts:	6	Dropouts:	7	Dropouts:	2
Transfers out:	10	Transfers out:	4	Transfers out:	5	Transfers out:	4
Transfers in:	8	Transfers in:	5	Transfers in:	6	Transfers in:	3
Died:	0	Died:	0	Died:	0	Died:	1
Emigrated:	0	Emigrated:	0	Emigrated:	0	Emigrated:	1
						Eligible SDAD ¹ :	1
Earned regular HS diploma:	0	Earned regular HS diploma:	0	Earned regular HS diploma:	3	Earned regular HS diploma:	71
						Earned SDAD ¹ :	1
Cohort at end of SY 17-18:	98 (100-10+8)	Cohort at end of SY 18-19:	99 (98-4+5)	Cohort at end of SY 19-20:	100 (99-5+6)	Cohort at end of SY 20-21:	97 (100-4+3-1-1-1+1)
Four-year ACGR:	NA	Four-year ACGR:	NA	Four-year ACGR:	NA	Four-year ACGR:	77.3195% ((3+71+1)/97*100)

Notes:

The cohort size is adjusted at the end of each year by accounting for the number of students who transfer into or out of the cohort and students who die or emigrate.

The cohort size is NOT adjusted at the end of each year by accounting for the number of students who drop out of school.

Any students who receive an alternate diploma should also be included in the ACGR calculation.

¹Students with the most significant cognitive disabilities who are eligible to receive a State-defined alternate diploma that have not graduated and remain enrolled are removed from the cohort and reassigned to a new cohort at the time of their original cohort's graduation. See Attachment E to see how the student is reassigned.

ATTACHMENT C

Calculating the five-year ACGR for the cohort of first-time grade 9 students formed in the 2017-2018 school year (SY) in a State without a State-defined alternate diploma

SY 2017-2018		SY 2018-2019		SY 2019-2020		SY 2020-2021		SY 2021-2022	
First-time grade 9 students:	100	Adjusted SY 17-18 grade 9 cohort:	98	Adjusted SY 17-18 grade 9 cohort:	99	Adjusted SY 17-18 grade 9 cohort:	100	Adjusted SY 17-18 grade 9 cohort:	97
Dropouts:	5	Dropouts:	6	Dropouts:	7	Dropouts:	2	Dropouts:	8
Transfers out:	10	Transfers out:	4	Transfers out:	5	Transfers out:	4	Transfers out:	3
Transfers in:	8	Transfers in:	5	Transfers in:	6	Transfers in:	3	Transfers in:	2
Died:	0	Died:	0	Died:	0	Died:	1	Died:	0
Emigrated:	0	Emigrated:	0	Emigrated:	0	Emigrated:	1	Emigrated:	0
Earned regular HS diploma:	0	Earned regular HS diploma:	0	Earned regular HS diploma:	3	Earned regular HS diploma:	71	Earned regular HS diploma:	6
Cohort at end of SY 17-18:	98 (100-10+8)	Cohort at end of SY 18-19:	99 (98-4+5)	Cohort at end of SY 19-20:	100 (99-5+6)	Cohort at end of SY 20-21:	97 (100-4+3-1-1)	Cohort at end of SY 21-22:	96 (97-3+2)
Four-year ACGR:	NA	Four-year ACGR:	NA	Four-year ACGR:	NA	Four-year ACGR:	76.2887% ((3+71)/97*100)	Four-year ACGR:	76.2887% ((3+71)/97*100)
Five-year ACGR:	NA	Five-year ACGR:	NA	Five-year ACGR:	NA	Five-year ACGR:	NA	Five-year ACGR:	83.3333% ((3+71+6)/96*100)

Notes:

The cohort size is adjusted at the end of each year by accounting for the number of students who transfer into or out of the cohort and students who die or emigrate.

The cohort size is NOT adjusted at the end of each year by accounting for the number of students who drop out of school.

The four-year ACGR remains unchanged in the cohort's fifth year.

Attachment D illustrates how to calculate the ACGR for students receiving the State-defined alternate diploma in the extended-year ACGR.

Any students who receive an alternate diploma should also be included in the ACGR calculation.

ATTACHMENT D

Calculating the five-year ACGR for the cohort of first-time grade 9 students formed in the 2017-2018 school year (SY) in a State with the State-defined alternate diploma (SDAD)

SY 2017-2018		SY 2018-2019		SY 2019-2020		SY 2020-2021		SY 2021-2022	
First-time grade 9 students:	100	Adjusted SY 17-18 grade 9 cohort:	98	Adjusted SY 17-18 grade 9 cohort:	99	Adjusted SY 17-18 grade 9 cohort:	100	Adjusted SY 17-18 grade 9 cohort:	97
Dropouts:	5	Dropouts:	6	Dropouts:	7	Dropouts:	2	Dropouts:	8
Transfers out:	10	Transfers out:	4	Transfers out:	5	Transfers out:	4	Transfers out:	3
Transfers in:	8	Transfers in:	5	Transfers in:	6	Transfers in:	3	Transfers in:	2
Died:	0	Died:	0	Died:	0	Died:	1	Died:	0
Emigrated:	0	Emigrated:	0	Emigrated:	0	Emigrated:	1	Emigrated:	0
						Eligible for SDAD ¹ :	1		
Earned regular HS diploma:	0	Earned regular HS diploma:	0	Earned regular HS diploma:	3	Earned regular HS diploma:	71	Earned regular HS diploma:	6
						Earned SDAD ¹ :	1		
Cohort at end of SY 17-18:	98 (100-10+8)	Cohort at end of SY 18-19:	99 (98-4+5)	Cohort at end of SY 19-20:	100 (99-5+6)	Cohort at end of SY 20-21:	97 (100-4+3-1-1-1+1)	Cohort at end of SY 21-22:	96 (97-3+2)
Four-year ACGR:	NA	Four-year ACGR:	NA	Four-year ACGR:	NA	Four-year ACGR:	77.3195% ((3+71+1)/97*100)	Four-year ACGR:	77.3195% ((3+71+1)/97*100)
Five-year ACGR:	NA	Five-year ACGR:	NA	Five-year ACGR:	NA	Five-year ACGR:	NA	Five-year ACGR:	84.375% ((3+71+1+6)/96*100)

Notes:

The cohort size is adjusted at the end of each year by accounting for the number of students who transfer into or out of the cohort and students who die or emigrate.

The cohort size is NOT adjusted at the end of each year by accounting for the number of students who drop out of school.

The four-year ACGR remains unchanged in the cohort's fifth year.

¹ Students with the most significant cognitive disabilities who are eligible to receive a State-defined alternate diploma that have not graduated are removed from the cohort and reassigned to a new cohort at the time of their graduation. See Attachment E to see how the student is reassigned.

ATTACHMENT E

Determining whether to include students with the most significant cognitive disabilities who are assessed using a State’s alternate assessment aligned with alternate academic achievement standards in the ACGR

