

TO: AEA Directors of Special Education

FROM: Amy J. Williamson, Administrative Consultant, Student and Family Support Services,  
Iowa Department of Education  


SUBJECT: Transition to the Title I Four-Year Adjusted Cohort Graduation Rate

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As most of you are aware, the Iowa Department of Education is required to begin calculating graduation rates using the mandated Title I Adjusted Cohort rate as of the 2010-2011 data reporting year. Requirements for this rate can be found at 34 CFR Chapter II §200.19, 7-1-10 edition. This memo provides an overview of the rate requirements and the Department's plan for transition.

The Title I rate is calculated as the number of students graduating in four years with a regular high school diploma divided by the number of students who form the adjusted cohort for that graduating class. The formula is:

$$\left[ \frac{\text{Number who graduated in four years or less}}{\text{Number who began 9}^{\text{th}} \text{ grade four years prior} + \text{Number of students who transferred in} - \text{Number of students who transferred out, emigrated, or died}} \right] \times 100$$

In the four-year adjusted rate, students who do not graduate in four years with a regular diploma decrease the overall graduation rate. This includes students with disabilities as well as any other student that does not complete within in the required four year period. Unfortunately, there is no provision in the Title I four-year rate that allows students with disabilities more time to graduate. Targets for the four-year adjusted cohort rate have been set in Iowa's Accountability Workbook as follows, and IDEA targets will be aligned to these targets. Procedures for determining AYP using the new rate are described below.

1. Iowa will use a minimum N-size of 40. A district or high school with fewer than 40 seniors will not use graduation rate in the determination of AYP
2. First, a district or school's graduation rate will be compared to the state goal of 95%. Iowa's State Board of Education has identified a graduation rate of 95% as the end goal.
3. If the 95% goal is not achieved, a district or school's graduation rate will be compared with the following targets:

<u>Data Year</u>	<u>Target</u>
2008-2009	80.9%
2009-2010	82.9%
2010-2011	84.9%
2011-2012	86.9%
2012-2013	88.9%

4. If the target is not achieved, a district or school's graduation rate will need to have improved two percentage points over the previous year's graduation rate to meet AYP.
5. If a district or school achieves a two percent (or greater) improvement over the prior year's graduation rate, that school or district will have met AYP for this indicator.

**Note that only the targets above apply for IDEA purposes. The remaining criteria are for AYP calculations only.**

The Title I regulations also include an extended-year adjusted cohort rate. An extended rate can be used to calculate the percent of students who graduate in four years or more. This rate must be approved by the Office of Elementary and Secondary Education as part of a state's Accountability Workbook under NCLB, and its use for AYP purposes must also be approved. The extended rate may also be used in reporting under IDEA. The DE plans to pursue the use of an extended graduation rate in order to underscore the importance of graduating all students and provide acknowledgement to districts for these efforts.

When AEAs and districts receive data profiles and determinations for IDEA in 2011 they will be based on 2008-2009 graduation and dropout data and will still use the previous calculation methods that included flexibility for students with disabilities. The Title I calculation will not affect AEA and district data or determinations, nor AYP calculations, until 2012.

Title I four-year adjusted cohort rate data for all students for 2009-2010 will be made available by the Department in February 2011. After those data have been analyzed and made available we will begin an analysis of data for the subgroup of students with disabilities. The Department will also convene a team of DE consultants to draft a proposal for Iowa's extended-year adjusted cohort rate, and we will ensure that special education is represented on that team.

The most important thing for educators to remember as we transition to the Title I graduation rate is that students with IEPs are entitled to FAPE as determined by the IEP team until or unless the student ages out of the program, exits special education services, graduates, dies, moves out of the state, or drops out. If an IEP team determines that a student with an IEP will continue to receive services beyond a fourth year of high school, the school must provide those services. The Department has considerable discretion in making determinations regarding graduation data as it pertains to IDEA, but there is no discretion with respect to the violation of students' rights. Any district or school found to be making inappropriate graduation decisions for students with IEPs (such as by making graduation decisions without regard to individual student need in order to meet data requirements) will be determined out of compliance with IDEA.

I will be keeping you apprised of developments regarding the graduation calculations, but encourage you to call or email me with any questions you may have. You can reach me at [amy.williamson@iowa.gov](mailto:amy.williamson@iowa.gov) or 515.339.4122.

For more information on the Title I rate please see:

Title I Regulations

<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr;sid=0def2c88948a3c35c7ed6231decda285;rgn=div6;view=text;node=34:1.2.2.1.1.1;idno=34;c=ecfr>

Non-regulatory Guidance

<http://www2.ed.gov/policy/elsec/guid/hsrguidance.pdf>