## **Title I Waiver for Other Academic Indicators**

Establishment of the Cohort Calculation for the High School Graduation Rate

The NDE (Nebraska Department of Education) is applying for a waiver of the calculation of the "cohort three-year graduation rate" contained in §200.19(b)(1)(i)(B) of the other academic indicators for the high school graduation rate requirement (34 CRF 200.19(b)(1)(i)(B), (7-1-09)) and the use of the calculation as amended (73 FR 64508 (Oct. 29, 2008)). **Specifically, NDE is requesting permission for Nebraska to exclude the cohort three-year calculation based on school systems organized with a three-year high school (grade 10 through 12).** NDE believes this waiver is necessary in order to ensure that a cohort calculation based on the student in grade nine for the first time is both valid and reliable for all Nebraska high schools. School systems organized with a three-year high school may include the ninth grade in determining compliance with the Nebraska Department of Education Rule 10 Section 002.010 (Title 92, Nebraska Administrative Code, Chapter 10 (Jan. 19, 2010)); Therefore, a cohort four-year graduation rate is a reasonable calculation. The USDE (U.S. Department of Education) No Child Left Behind High School Graduation Rate Non-Regulatory Guidance (Dec. 22, 2008) can be found at the following link:

http://www.nde.state.ne.us/nssrs/Docs/hsgrguidance.pdf

NDE believes this waiver will ensure the validity and reliability of Nebraska's cohort graduation rate for all high schools. For school systems organized with a four-year or three-year high school, a cohort based on a cohort four-year calculation will improve the uniformity of the cohort graduation rate across Nebraska's high schools. The district assigns a cohort (Expected Graduation Year) to the NDE Student ID by uploading the NDE Student IDs in the student template ([Student: Graduation Year (53)] to NSSRS. The cohort (Expected Graduation Year) value is based on the student's first time in grade nine. District can review transcripts or credits to determine the student's first time in grade nine and calculate the cohort based on a four-year graduation. NDE evaluates the NDE Student IDs in the student and student snapshot template from NSSRS (Nebraska Student and Staff Information Service) to identify the first time grade nine students in Fall Membership and the earliest student template from grade 9 through 12 starting in 2007-08 school year. NDE designed an Expected Graduation Year Lookup form for districts to review the cohort assigned to the NDE Student ID. By incorporating only a cohort four-year graduation rate, Nebraska preserves the consistency of the graduation rate for all high schools throughout the state.

Nebraska assures it verified whether a cohort needs to be calculated based on a four-year or three year cohort (Expected Graduation Year) prior to excluding the three-year cohort calculation. From the 2007-08 to the 2009-10 school year, one high school operated as a three-year high school system. Nebraska will post on its website a list of the three-year high schools and the school year that it will exclude under this waiver.

Comments are encouraged and should be submitted via email to <a href="mailto:randy.mcintyre@nebraska.gov">randy.mcintyre@nebraska.gov</a> by 5:00pm (Central) on May 3, 2010.