

**Oklahoma Request to Waive March 2, 2009 Deadline  
To Implement Four-Year Cohort Graduation Rate**

August 17, 2012

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Acting Director  
Student Achievement and School Accountability Programs  
Office of Elementary and Secondary Education  
U.S. Department of Education  
400 Maryland Ave. SW, Rm. 3C132  
Washington, DC 20202

Dear Mr. Brown:

I am writing on behalf of Oklahoma to request a waiver from Section 200.19(b)(7) of Title I-- Improving the Academic Achievement of the Disadvantaged; Final Rule which established the deadline of March 2, 2009, to request an extension to implement the four-year adjusted cohort graduation rate by the 2011-2012 school year. To accomplish the demands of this graduation calculation, a state-wide data management system which is effectively utilized by every district in our state is necessary. To this point, such a system has not been fully operational in Oklahoma because not all districts provided and certified the needed data. The table found in Attachment I provides the reasons for Oklahoma's need for a waiver and the timeline for becoming fully compliant in reporting the cohort graduation rate.

Thank you for considering our request for a waiver. I am happy to provide additional information should it be needed or to answer any questions about Oklahoma's procedures for data collection or calculation of the cohort graduation rate.

Sincerely,

Maridyth M. McBee, PhD  
Assistant State Superintendent  
Accountability and Assessment  
Oklahoma State Department of Education  
2500 N. Lincoln Boulevard  
Oklahoma City, OK 73105

## Attachment 1

#	Question	Answer
1	When will the Wave be sufficiently developed for graduation rate purposes (e.g., “interface with other student info systems in use”)?	<p>The SYSTEM itself is sufficiently developed today for cohort graduation rate purposes. The state system and the local systems are communicating and exchanging information that will include the elements necessary to produce the four-year cohort graduation rate beginning with the class of 2013.</p> <p>The data are currently in our system. The issue that remains is the certification of the data for the purposes of calculating an accurate cohort graduation rate.</p> <p>There are two separate efforts to certify the data we need.</p> <ol style="list-style-type: none"> <li>1. We are implementing this fall a new tool for districts to certify enrollment and entry/exit data, as well the date on which a student receives his diploma. This tool will be carry forward starting with the entry/exit for the 2011-12 school year.</li> <li>2. We are developing for this school year a second tool for districts to certify the retrospective data we need to complete the cohort analysis. This tool will be used only to certify enrollment and entry/exit data for 2009-10 and 2010-11 school years, as well as enrollment data for 2011-12 school year.</li> </ol> <p>Once these data for the class of 2013 – and any data missing retrospective to the start of high school for this first cohort -- has been certified by the districts, we will be able to generate the four-year cohort rate for the class of 2013.</p> <p>Going forward, we will be able to generate the four-year cohort rate for subsequent graduating classes.</p>

#	Question	Answer
2	What makes the Wave sufficient for meeting requirements (e.g., can track subgroups, was operational for entire state in 2010-11, etc.)?	All information is tracked at the student level and all demographic and indicators are linked to the individual student so subgroups can be easily tracked as well as the mobility in and out of schools for each individual student.
3	When did all district personnel been using the Wave? Or, when will they?	<p>The Wave has been successfully in production for four years with each year showing improvement in the quality of data transmitted from the school to the state.</p> <p>For the past three years, we have pre-coded assessments and starting last year we provided direct certification for low income students.</p> <p>This fall, the system will offer data back to the districts via the new Early Warning Indicator System and a new reporting tool (that will produce aggregate counts for federal and other reporting using certified student-level data).</p> <p>Sharing with districts the data in the state system allows the OSDE to evaluate the data quality and other issues that will inform the expanded certification process to begin in the fall 2012 and continue throughout the 2012-13 school year (and beyond).</p>
4	When will/were all proper procedures for collecting information for the four-year adjusted cohort rate be in place at the state level? (e.g., only first-time 9 <sup>th</sup> graders, only regular high school diploma, no GED graduates, etc.)? At the local level?	<p>The OSDE's new data governance committee – working from and within state and federal laws/reg. -- is responsible for finalizing the policies and procedures necessary to produce the cohort grad rate.</p> <p>These policies and procedures will be guide the development of the certification and reporting process going forward.</p> <p>This work will be completed by the spring 2013.</p>
5	When will/were guidance for proper collection and documentation of data at the local level be in place? What evidence can you provide to document this?	<p>The Office of Accountability and Assessment will include guidance for proper collection of data in the September/October email communication of Accountability policies and procedures. Accountability webinars held throughout the year will also provide this guidance. Additionally, this information will be added to the Testing trainings.</p> <p>The 2.x Wave Requirements Documentation provides guidance regarding the elements that must exist inside the local student information system. Data is checked for validity daily and displayed to the end user on a web portal for data correction in their local system. This document has been available to districts since 2008 via the secure Wave website. The data is not complete at this time because some districts did not comply with the requirement. Districts will be required to certify their data so that it will be usable beginning with the 2011-12 school year.</p>
6	When, and for what student cohort, will Oklahoma first be able to report a four-year adjusted cohort graduation rate?	OSDE will be in a position to report on the cohort graduation rate for the class of 2013 in early 2014.

#	Question	Answer
7	When, and for what student cohort, will Oklahoma first be able to report a four-year adjusted cohort graduation rate that follows all procedures and policies (e.g., for adding/removing students from a cohort) in the regulation?	<p>OSDE will be in a position to report on the cohort graduation rate for the class of 2013 in early 2014 – following all procedures and policies, except using respectively certified data for the initial years.</p> <p>By 2016, the new certification procedures (not the retro exception) will have been in place for four years.</p>
8	For any of the above that are to fully in place, a timeline with benchmarks for between now and full implementation would also be helpful.	<p>October 2012 – Certification Piece in Place that allows for review and certification of data that already exists in the system. This certification tool will allow us to capture the following reports:</p> <ol style="list-style-type: none"> <li>1. October/November 2012 – District personnel review the data and produce the first certified “Consolidated October 1 Report” for all grades and key federal reporting subgroups at the student level.</li> <li>2. October/November 2012 – District personnel review the data and produce the first certified “Comprehensive Exit Report” for all grades and key federal reporting subgroups at the student level indicating the “reason” why the student exited their district. If the student does not re-enroll in a district, one of the five categories will apply and be certified on this report: <ul style="list-style-type: none"> <li>• Reason 1 – Graduation,</li> <li>• Reason 2 – Drop Out,</li> <li>• Reason 3 – Death or Permanently Incapacitated,</li> <li>• Reason 4 – Transferred to another educational entity (Out of State, In State, Public, Private, Homeschool) and</li> <li>• Reason 5 – Longer Term Suspension/Expulsion (Note: Student will be checked for re-entry or will be moved to Drop Out).</li> </ul> </li> <li>3. February/March 2013 – Districts will certify their retrospective data report.</li> <li>4. May/June 2013 – District personnel review the data and produce the first “Supplemental Membership Annual Reporting Totals” report for all grades and key federal reporting subgroups at the student level. All students who entered a school during the 2012-2013 school year and who were NOT reported on the Consolidated October 1 Report will be reviewed and certified on this report to capture the “gap” of students who exit before October 1 or enter after October 1 so that the Entry of all students can be accounted for.</li> <li>5. October/November 2013 – districts will certify final data needed to generate the cohort graduation rate for the class of 2013.</li> </ol> <p>These three reports will provide every student educated in public schools in Oklahoma, their grade level, their subgroups. After four years of this collection all cohorts can be effectively determined and tracked for every age group.</p>

