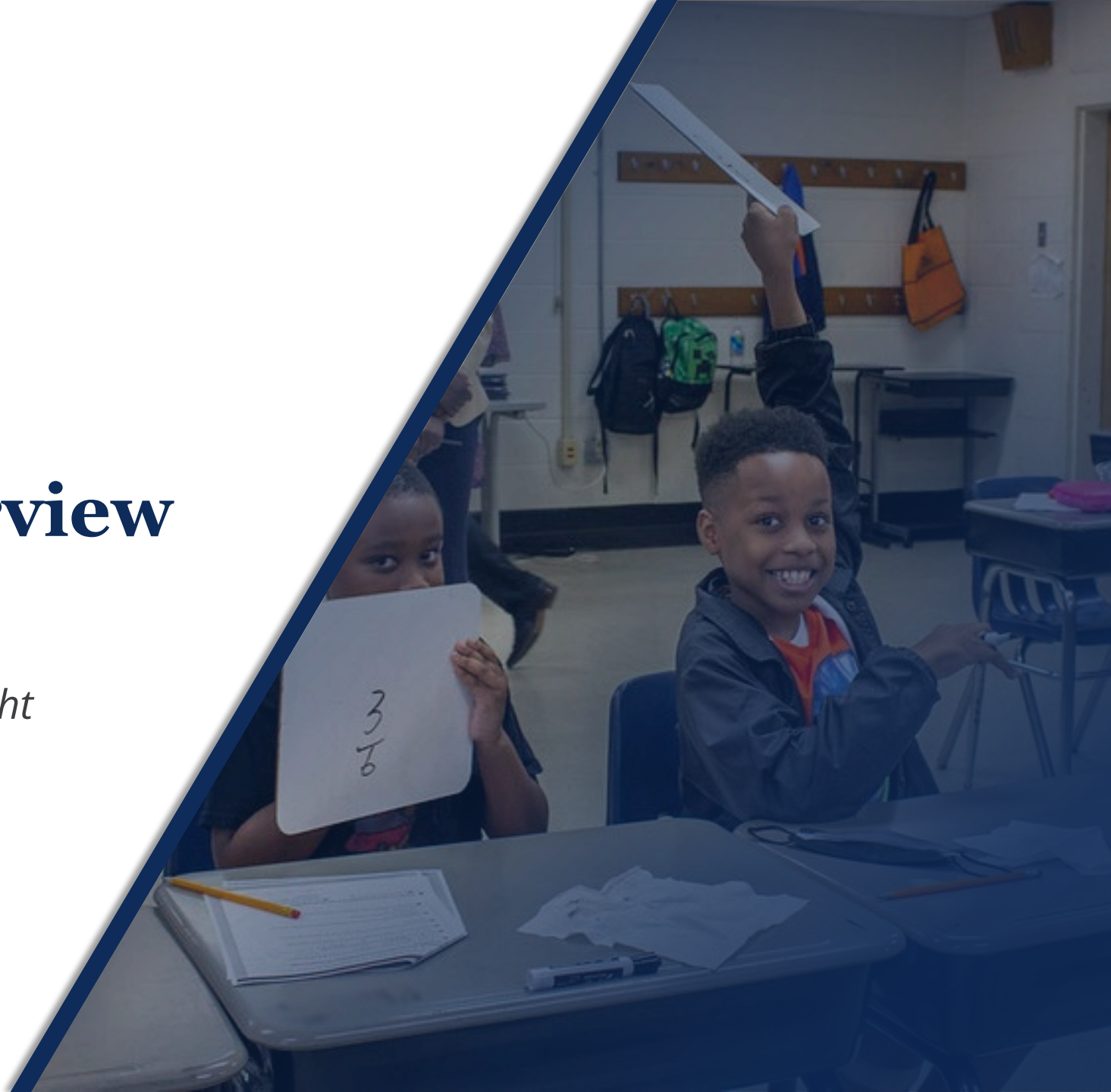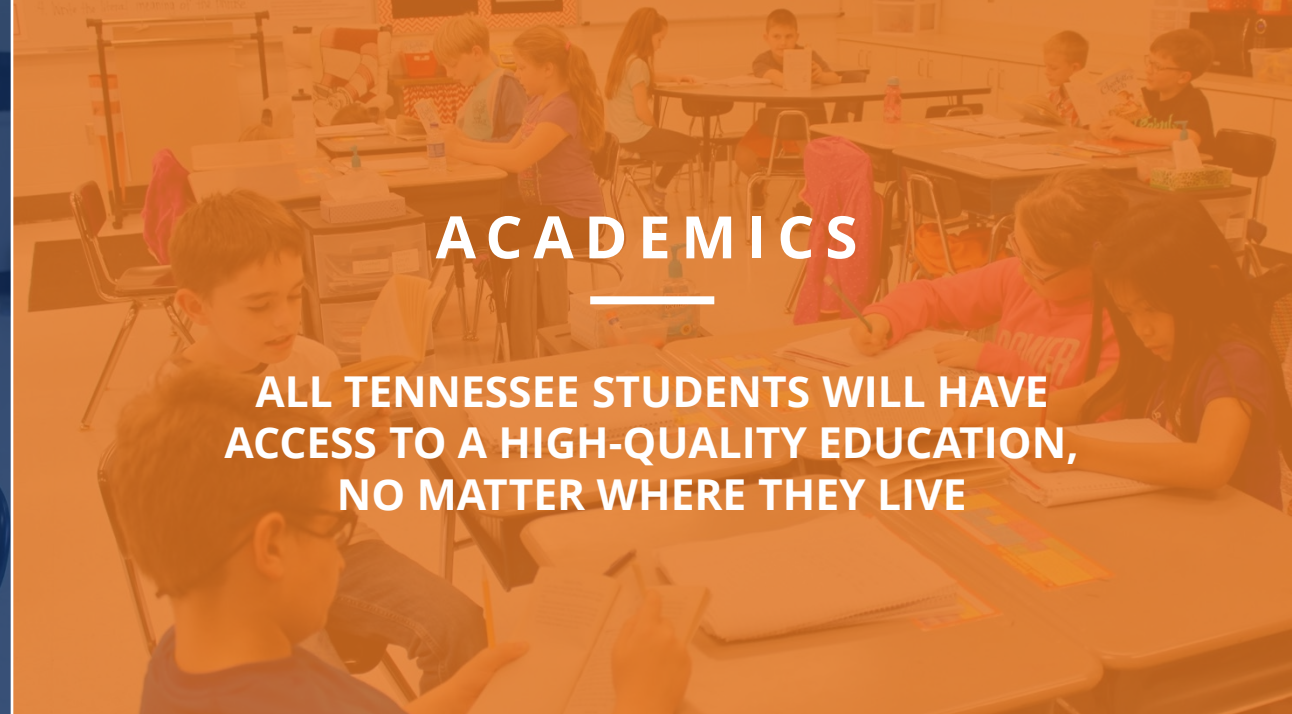# Comparability Overview

Heather Farley

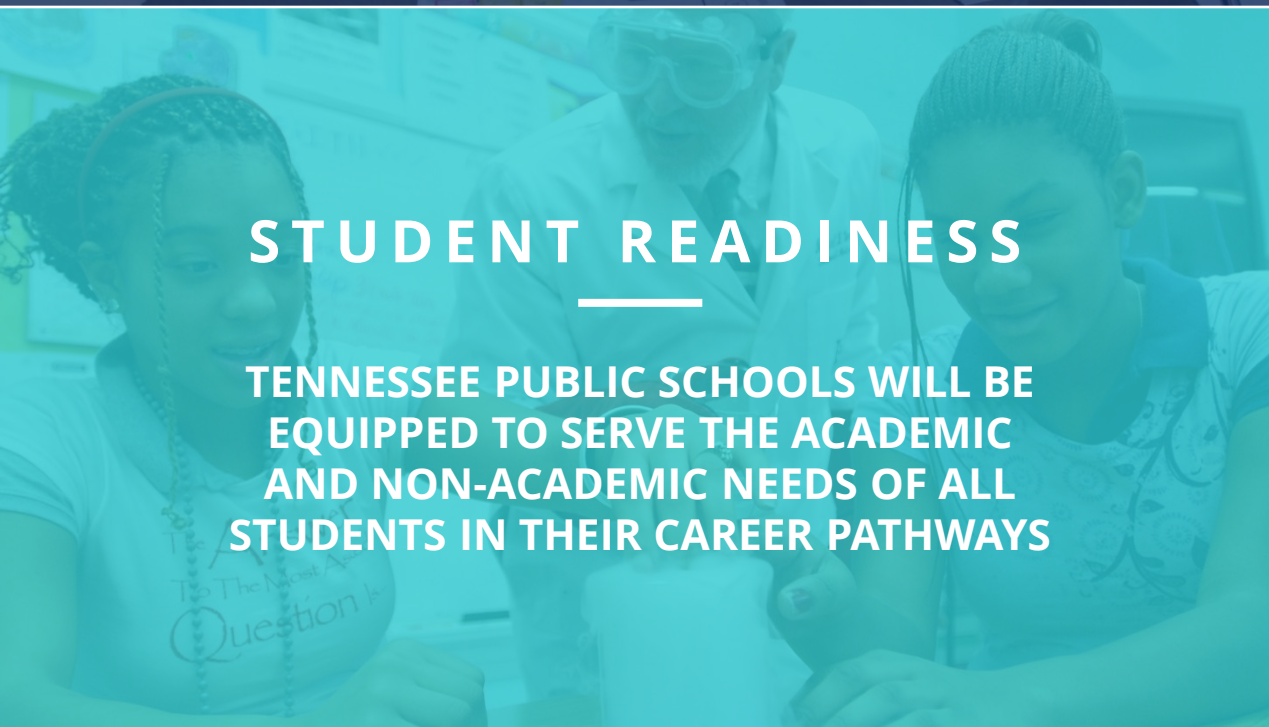*Division of Federal Programs and Oversight*

BEST for ALL

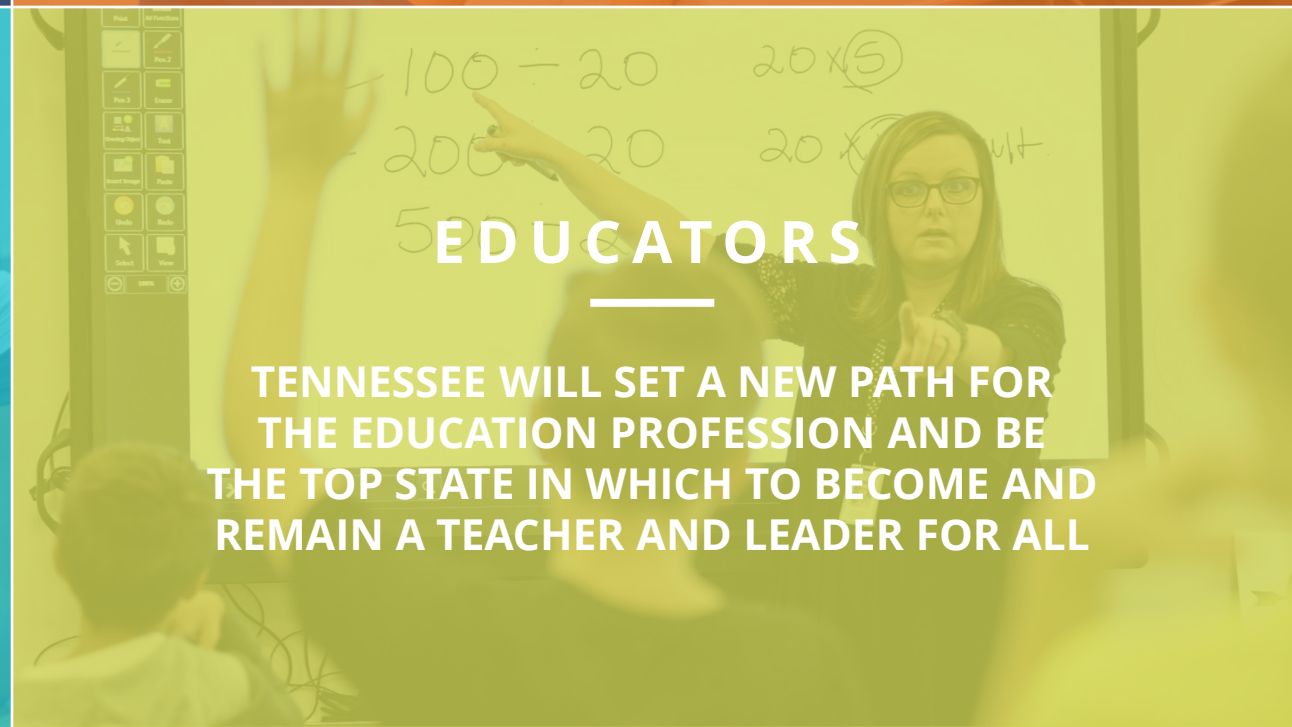We will set all students on a path to success.

ACADEMICS

ALL TENNESSEE STUDENTS WILL HAVE ACCESS TO A HIGH-QUALITY EDUCATION, NO MATTER WHERE THEY LIVE

STUDENT READINESS

TENNESSEE PUBLIC SCHOOLS WILL BE EQUIPPED TO SERVE THE ACADEMIC AND NON-ACADEMIC NEEDS OF ALL STUDENTS IN THEIR CAREER PATHWAYS

EDUCATORS

TENNESSEE WILL SET A NEW PATH FOR THE EDUCATION PROFESSION AND BE THE TOP STATE IN WHICH TO BECOME AND REMAIN A TEACHER AND LEADER FOR ALL

- Required Process
- Comparability Application Supplement
- Technical Assistance

Basic Premise of Comparability

- The basic premise of comparability is to ensure that an LEA can demonstrate that state and local funds used to provide services in Title I, Part A schools are *at least comparable* to the services in non-Title I schools.

- Grade span groupings used to demonstrate comparability are very important.
  - Grade span groupings must match the basic organization of schools in the LEA. Note: Pre-K is not included in comparability.

- Groupings should also reflect the organization on the ***School Eligibility* page in the LEA's current fiscal year Consolidated Funding Application (CFA)**.

Prerequisite for Receiving Title I, Part A Funds

- Demonstrating comparability is a prerequisite for receiving Title I, Part A funds.

- Because **Title I, Part A allocations are made annually,** comparability is an **annual requirement**.

- Each LEA must perform comparability calculations annually to demonstrate that all Title I schools within the LEA are, in fact, comparable and adjust if any are not comparable.

Required Forms

Uploading a File to ePlan

- **Form III** is an Excel file that must be completed and uploaded to the ***Related Documents* section** of the Comparability Application Supplement which contains support personnel for each school.

- Note: Other forms in the ***Related Documents section*** are for alternative methods.

- **Please do not print and scan in Excel files**. If Excel files are printed and scanned, the department will contact the LEA to upload the completed Excel files.

LEA Written Procedures

- An LEA must develop procedures for complying with comparability requirements.
- These procedures should be in writing and should, at a minimum, include:
  - identification of the office responsible for making comparability calculations,
  - timeline for demonstrating comparability,
  - method and process for collecting data required to demonstrate comparability,
  - selected basis for demonstrating comparability, and
  - how and when the LEA makes adjustments in schools that are not comparable.

Maintaining Source Documentation

- **The LEA must maintain source documentation** to support the calculations and form submitted to demonstrate comparability and any needed adjustments made to staff assignments.

Comparability Application Supplement

TN Department of Education
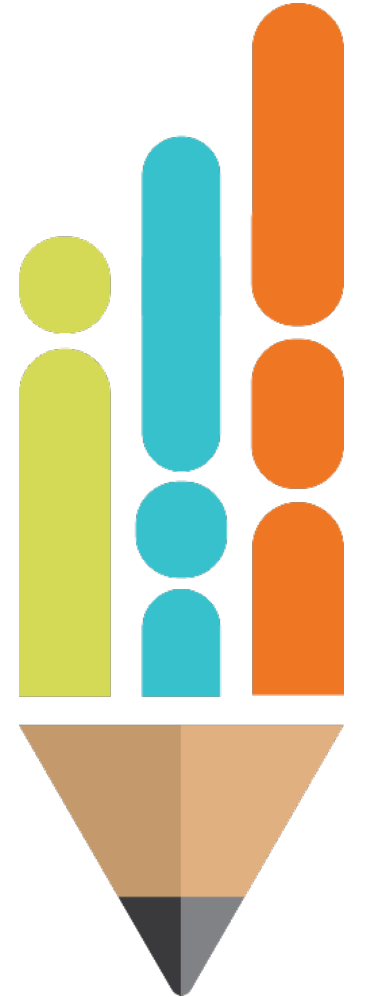
Location of Comparability Application Supplement

- http://eplan.tn.gov

- **Data and Information**

Comparability Application Supplement: Section Page

Comparability Sections

Public District - FY 2021 - Comparability - Rev 0

This is the TEST site. Please be sure to complete your work on the LIVE site.

Status: **Draft Started**

Change Status To: LEA Consolidated Director Draft Completed

Description (View Sections Only View All Pages)	Validation	Print
		☐ Select Items
All	Messages	Print
− **History Log**		Print
History Log		Print
Create Comment		Print
− Comparability	Messages	Print
Program Details	Messages	Print
Assurances	Messages	Print
Grade Spans		Print
School Information	Messages	Print
Form II		Print
Comparability Method	Messages	Print
Related Documents	Messages	Print
All	Messages	Print

Comparability Application Supplement: Grade Spans

- Grade Spans: Allows the LEA to set up the grade span groupings for the LEA.

- Note: Grade span groupings must match the *School Eligibility* page in the LEA's current fiscal year CFA.

Comparability Application Supplement: Student Counts

- Input this data in the **School Information** section.
- School lists will auto-populate from the CFA.
- Grade span drop-down menus will generate from the previous page.
- Student counts **from the current school year**:
  – Enrollment
  – Low Income

School Information

- FY 2020 - Comparability - Rev 0

Save And Go To ▶

School Name	* Grade Span	Service Type	Student Counts	
			* Enrollment	* Low Income
Anderson County Career Technical Center	9-12 ▾	None	411	253
Anderson County High School	9-12 ▾	None	1069	341
Andersonville Elementary	K-5 ▾	GF (SW)	309	120
Briceville Elementary	K-5 ▾	SW	117	70
Claxton Elementary	K-5 ▾	SW	448	233
Clinch River Community School	K-12 ▾	None	68	47
Clinton High School	9-12 ▾	None	1083	480
Clinton Middle School	6-8 ▾	None	667	273
Dutch Valley Elementary	K-5 ▾	SW	103	55
Fairview Elementary	K-5 ▾	SW	284	125
Grand Oaks Elementary	K-5 ▾	SW	275	111
Lake City Elementary	K-5 ▾	SW	421	221
Lake City Middle School	6-8 ▾	None	284	141
Norris Elementary	K-5 ▾	None	211	53
Norris Middle School	6-8 ▾	None	488	149
Norwood Elementary	K-5 ▾	SW	237	126
Norwood Middle School	6-8 ▾	None	188	95
		Totals:	6663	2893

The above is a test example, not actual LEA results.

Comparability Application Supplement: Licensed Instructional Staff

- This data is in the **School Information** section.

- Licensed Instructional Staff will pull from the **Form II** section within the *Comparability Application Supplement*.

- Ensure all data pulled from the Education Information System (EIS) is correct within the **Form II** section.

School Name	Licensed Instruction Personnel		
	* Excluded State/Local FTE (LEP/SWD)	* Federal FTE	* State/Local FTE
Anderson County Career Technical Center	0.00	0.00	33.00
Anderson County High School	0.00	0.00	54.10
Andersonville Elementary	0.00	2.00	21.11
Briceville Elementary	0.00	1.50	10.20
Claxton Elementary	0.00	5.00	31.00
Clinch River Community School	0.00	0.00	13.57
Clinton High School	0.00	0.00	53.50
Clinton Middle School	0.00	0.00	40.50
Dutch Valley Elementary	0.00	1.50	9.60
Fairview Elementary	0.00	2.00	19.63
Grand Oaks Elementary	0.00	1.00	18.20
Lake City Elementary	0.00	4.00	29.13
Lake City Middle School	0.00	0.00	19.77
Norris Elementary	0.00	0.00	15.97
Norris Middle School	0.00	0.00	30.38
Norwood Elementary	0.00	3.50	17.99
Norwood Middle School	0.00	0.00	17.01
	0.00	20.50	434.66

The above is a test example, not actual LEA results.

Comparability Application Supplement: Support Staff

- This page must correspond to the uploaded **Form III**.

- **Form III** must be uploaded into the **Related Documents** section within the *Comparability Application Supplement*.

- Ensure consistency for exclusions among each school.

- Note: LEAs can exclude staff utilizing the check box beside each row for support staff.

School Name	* Excluded State/Local FTE (LEP/SWD)	Other Personnel Supporting Instruction		State/Local FTE for Comparability (1 FTE = .5 FTE)
		* Actual Federal FTE	* Actual State/Local FTE	
Black Fox Elementary School	☐	☐ 2.00	☐ 3.00	1.500
Bradley Central High School	☐	☐ 3.00	☐ 1.50	0.750
Bradley County Virtual School	☐	☐ 0.00	☐ 3.50	1.750
Charleston Elementary School	☐	☐ 5.80	☐ 4.00	2.000
Hopewell Elementary School	☐	☐ 2.00	☐ 4.00	2.000
Lake Forest Middle School	☐	☐ 0.00	☐ 3.00	1.500
Michigan Avenue Elementary School	☐	☐ 1.00	☐ 2.00	1.000

The above is a test example, not actual LEA results.

Comparability Application Supplement: Form II

- **Form II** is populated with names and assignments for K–12 licensed instructional staff with assignments in EIS.

- The data is pulled from the Oct. 1 count from EIS.

- Staff is listed by school.

- The data from this page pulls into the instructional staff counts on the *School Information* page.

Form II

Public District - FY 2021 - Comparability - Rev 0

This is the TEST site. Please be sure to complete your work on the LIVE site.

| Save And Go To ▶ |

| Black Fox Elementary School ⌄ |

LAST Name of Employee	FIRST Name of Employee	Position (Please be specific)	Exluded State/Local FTE (LEP/SWD)	Federal FTE	State/Local FTE
Add New Personnel					
🗑 Zebra *	Apple *	Teacher *	* 0.00 *	0.00 *	0.00 *
		Totals:	0.00	0.00	0.00

| Save And Go To ▶ |

Comparability Application Supplement: Form II

- LEAs can manipulate staff for each school that was pulled from EIS.
  - Use the trash can to remove staff.
  - Use *Add New Personnel* to add staff.
- Once a school is completed, click **Save And Go To** to save the information.
- Go to another school via the *Comparability Application Supplement* drop-down arrow to check for accuracy and add the FTE count for each staff member.
- Repeat for each school in the LEA.

Comparability Application Supplement: Comparability Method

School Name	Grade Span	Service Type	110% Student/Staff Ratio for Non-Title I Schools		
			Test Value	Actual Value	Test Result
Andersonville Elementary	K-5	GF (SW)	17.27	13.98	Passed
Briceville Elementary	K-5	SW	17.27	10.60	Passed
Claxton Elementary	K-5	SW	17.27	12.99	Passed
Dutch Valley Elementary	K-5	SW	17.27	9.72	Passed
Fairview Elementary	K-5	SW	17.27	13.13	Passed
Grand Oaks Elementary	K-5	SW	17.27	13.96	Passed
Lake City Elementary	K-5	SW	17.27	13.63	Passed
Norwood Elementary	K-5	SW	17.27	12.32	Passed
				Passing Schools:	8 / 8

Public District - FY 2020 - Comparability - Rev 0

Go To ▶

The above is a test example, not actual LEA results.

Comparability Application Supplement: Comparability Method

School Name	Grade Span	Service Type	110% Student/Staff Ratio for Non-Title I Schools Within Grade Span		
			Test Value	Actual Value	Test Result
Andersonville Elementary	K-5	GF (SW)	13.29	13.98	Failed
Briceville Elementary	K-5	SW	13.29	10.60	Passed
Claxton Elementary	K-5	SW	13.29	12.99	Passed
Dutch Valley Elementary	K-5	SW	13.29	9.72	Passed
Fairview Elementary	K-5	SW	13.29	13.13	Passed
Grand Oaks Elementary	K-5	SW	13.29	13.96	Failed
Lake City Elementary	K-5	SW	13.29	13.63	Failed
Norwood Elementary	K-5	SW	13.29	12.32	Passed
				Passing Schools:	5 / 8

The above is a test example, not actual LEA results.

If Schools Are Not Comparable

- **If the LEA is unable to demonstrate comparability by the November deadline, the LEA must still upload all required forms by the November deadline _and_ a letter** stating that the LEA was not able to demonstrate comparability and understands it must make necessary adjustments within the same school year.
  - Upload documents to the **Related Documents** section of the _Comparability Application Supplement_.

- If, after review by the department, the LEA's first submission shows comparability has not been met due to an error in data, calculation or procedure, and adjustments are required, the LEA will be notified.

Comparability Deadlines

- **If adjustments are required to demonstrate comparability, all new comparability forms _and_ a letter** stating what adjustments were made must be uploaded to ePlan in the *Comparability Application Supplement* **Related Documents** section no later than **Dec. 1** of the same school year.

Technical Assistance

Comparability Guidance

- **Comparability Procedures Guide and Data**
  - [ePlan.tn.gov > TDOE Resources](#) > 7. Data and Information Tools > Comparability > Year

- **Recorded Webinars**
  - [ePlan.tn.gov > TDOE Resources](#) > Federal Programs and Oversight (FPO) > Federal Programs Professional Development > 2020-21 Federal Programs Webinar Series > ESEA Title I, Part A Comparability

- **Contact Divisional Coordinators**
  - Heather Farley | Top 20 Most Populous LEAs and Middle (vacant)
    - Heather.Farley@tn.gov
  - Lynn Dotson | West TN
    - Lynn.Dotson@tn.gov
  - Henry Lafollette | East TN
    - Henry.LaFollette@tn.gov
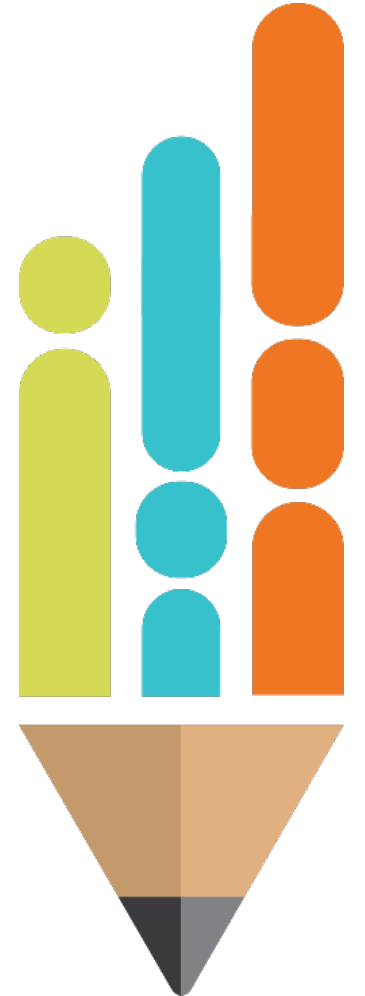
Fraud, Waste or Abuse

Citizens and agencies are encouraged to report fraud, waste, or abuse in State and Local government.

NOTICE: This agency is a recipient of taxpayer funding. If you observe an agency director or employee engaging in any activity which you consider to be illegal, improper or wasteful, please call the state Comptroller's toll-free Hotline:

1-800-232-5454

Notifications can also be submitted electronically at:

http://www.comptroller.tn.gov/hotline