

## ESEA Director's Training Curriculum

### 2.4 Comparability—A Fiscal Test

Comparability is the second of the Title I three fiscal tests. It is required **annually** to ensure federal funds are used to supplement Title I schools and that Title I schools receive state and local funds that are “at least comparable” to the level of state and local funding received by non-Title I schools [ESEA § 1118(c)].

#### Methods to Demonstrate Comparability Include:

- Student-instructional staff ratio (Tennessee’s default method)
- Per-pupil expenditures: an alternative method that looks directly at allocation of state and local education funds per student

#### Dates of Importance & Deadlines for FY25 Comparability:

- **Oct. 4:** Last day for LEAs to upload data from SIS to EIS in order to populate Comparability Form II in ePlan.
- **Oct. 7:** FPO downloads K-12 licensed instructional staff data from EIS to populate Form II.
- **Oct. 14:** Comparability Form II and III open in ePlan.
- **Nov. 18:** Due date for completing the comparability tool in ePlan (LEA Authorized Representative Approved). Comparability Tool closes in ePlan at closed of business day.
- **Dec. 1:** If applicable, letter is due in ePlan stating adjustments are completed if comparability not initially met by the due date.

#### [2024-25 Comparability Procedures \(tn.gov\)](#)

- [Divisional Coordinators](#)
- Slide decks and webinar(s) in [ePlan.tn.gov > TDOE Resources](#) > Federal Programs Professional Development > Federal Programs Webinar Series > ESEA Title I, Part A Comparability
  - ESEA Title I, Part A Comparability Part 1: Methods Overview  
[Microsoft Stream Webinar Link](#) | [Slide Deck Link](#)
  - ESEA Title I, Part A Comparability Part 2: An Improved Vision for Comparability  
[Microsoft Stream Webinar Link](#) | [Slide Deck Link](#)
- [Title I Comparability Guide](#)