



Comparability Guide

2024–25

Federal Programs and Oversight | August 2024

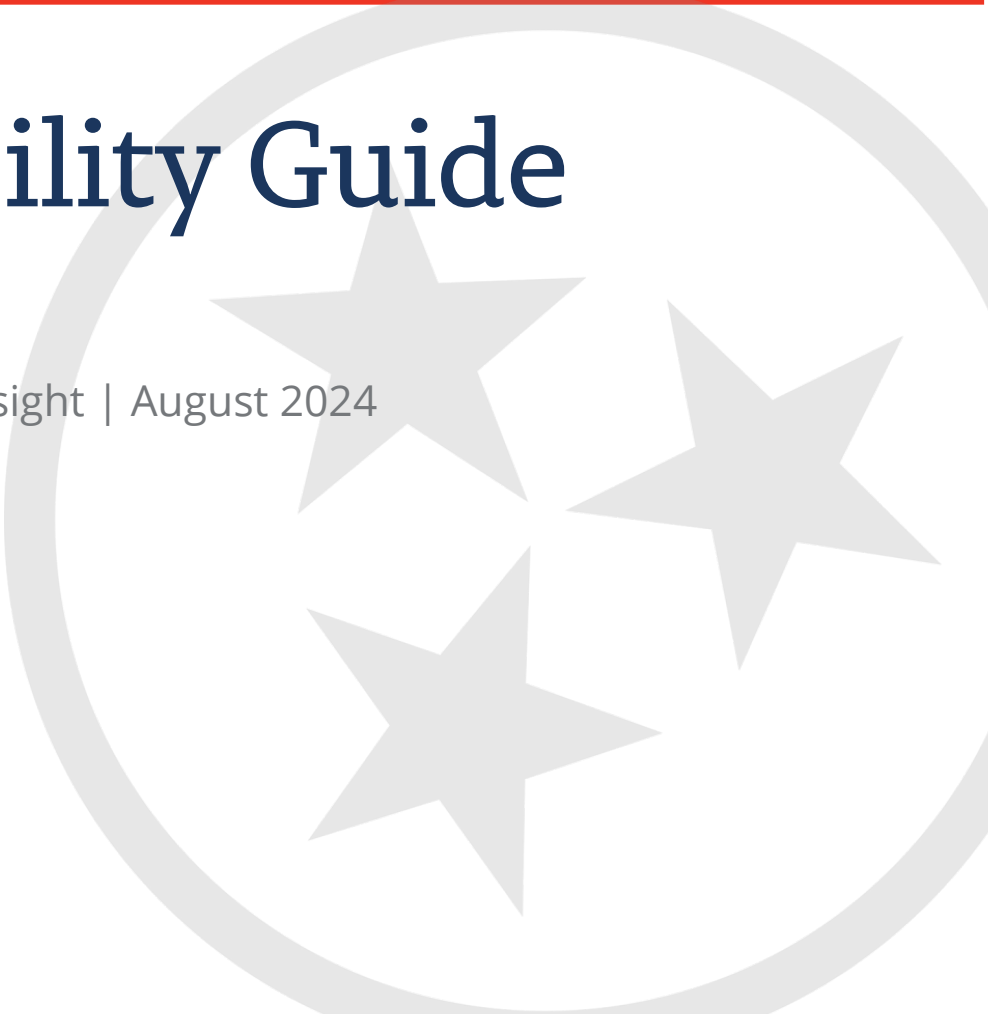


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Overview

Demonstrating comparability is a prerequisite for receiving Title I, Part A funds. Since Title I, Part A allocations are made annually, demonstrating comparability is an **annual requirement**. The Local Educational Agency (LEA) must perform comparability calculations every year to demonstrate that all of its Title I schools are comparable and make adjustments if any are not. Adjustments must be made as early in the same school year as possible and with minimum disruption to the learning environment.

To be eligible to receive Title I, Part A funds, the LEA must use state and local funds to provide services in Title I schools that are at least comparable to services provided in non-Title I schools. If the LEA serves all of its schools, or all schools within a particular grade span, with Title I funds, the LEA must use state and local funds to provide services that are substantially comparable in each school.

Under the Every Student Succeeds Act (ESSA), the Tennessee Department of Education (department) may establish the method LEAs use to determine comparability. The department has flexibility in establishing reasonable variances for LEAs to use in determining whether their schools are comparable.

The standard comparability method the department uses compares student/staff ratios for state and locally-funded instructional staff in each Title I school with the average student/staff ratios for state and locally-funded instructional staff in non-Title I schools. A Title I school is deemed comparable if its student/staff ratio does not exceed 110 percent of the average student/staff ratio of non-Title schools. If all schools in the LEA or all schools within a particular grade span are Title I, a Title I school is deemed comparable if its student/staff ratio does not exceed 110 percent of the average student/staff ratio of Title I schools. Alternative methods to demonstrate comparability may also be considered as described in the [appendices](#).

Comparability Deadlines

No later than Nov. 18, LEAs shall annually demonstrate if comparability requirements have been met via the Comparability Data and Information report on ePlan.tn.gov. Required form(s) must be uploaded to the Comparability Data and Information report *Related Documents* section when it is submitted.

If the LEA is unable to demonstrate comparability by the Nov. 18 deadline, **the LEA must complete the comparability Data and Information report, upload required form(s) by Nov. 18 and include a letter** stating that the LEA was not able to demonstrate comparability and understands it must make necessary adjustments within the same school year in the Related Documents section. If the LEA's first submission, after review by the department, shows comparability has not been met due to an error in data, calculation, or procedure, and adjustments are required, the LEA will be notified by the department.

If adjustments are required to demonstrate comparability, **the LEA must revise the Comparability Data and Information report, upload any new comparability forms and upload a letter** in the Related Documents section stating what adjustments were made to ePlan **no later than Dec. 1** of the same school year.

Developing LEA Procedures for Compliance

An LEA must develop procedures for complying with comparability requirements. [ESEA § 1118(c)] These procedures must be in writing and should, at a minimum, include the LEA's

- 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
- timeline of how and when the LEA makes adjustments to demonstrate comparability.

Basis for Demonstrating Comparability

LEAs using the standard comparability method will determine comparability based on the average number of students per state- and locally-funded instructional staff. The LEA may demonstrate comparability using either calculation basis below:

- **LEA basis** where,
 - All Title I schools are compared to all non-Title I schools; or
 - All Title I schools are compared to all Title I schools

or

- **Grade-span basis** where,
 - By grade-span, Title I schools are compared to non-Title I schools; or
 - By grade-span, Title I schools are compared to Title I schools

Alternative methods to demonstrate comparability may also be considered as described in the [appendices](#).

Grade-Span Grouping

The basic premise of comparability is to ensure the LEA can demonstrate that state and local funds used to provide services at Title I schools are at least comparable to the services at non-Title I schools. For this reason, the grade-span groupings used for comparing schools to demonstrate comparability are very important. Grade-span groupings must match the basic organization of schools in the LEA.

If the LEA has multiple schools serving grades that cross more than one of the basic grade-span grouping configurations, and at least one of those schools is a Title I school, those schools may be compared as a separate grade-span grouping.

For example, if the LEA's basic organization includes schools serving grades K-5, 6-8, and 9-12, the LEA would have three grade-span groupings. If the LEA also has two schools serving grades K-8, and at least one of those schools is a Title I school, the LEA would have four grade-span groupings—the fourth being K-8.

Defined grade-span groupings for comparability must take into consideration which grades the LEA serves with Title I funds. For instance, if the Title I schools in the LEA serve only grades K-8, but not grades 9-12, the comparability calculations only need to include the Title I and/or non-Title I elementary and middle schools, but not the non-Title I high schools. However, if a school crosses multiple grade-span groupings where any grades in the LEA are served with Title I funds, it must be included in one of the grade-span groupings of the basic organizations of the LEA.

Schools Serving Grades that Cross More than one Grade-Span Grouping

No school may be excluded from comparability simply because it crosses multiple grade-span groupings. For instance, if the LEA's basic organization primarily includes schools serving K-5, 6-8, and 9-12, the LEA would have three grade-span groupings. If the LEA also has one K-6 school, the school could be included in the K-5 grade-span grouping but K-6 could not be identified as a separate grade-span grouping. Likewise, if the LEA has two K-8 non-Title I schools, the LEA would still have only three grade-span groupings for comparability because at least one of those K-8 schools is not a Title I school.

If a school serves grades that cross more than one grade-span grouping, the LEA has the following options for including the school in comparability determinations:

OPTION 1: Include a school in the grade-span grouping with which the school has the most grades in common:

- A K–6 school could be compared within the K–5 grade-span grouping.
- A K–8 school could be compared within the K–5 grade-span grouping.
- A 6–12 school could be compared within the 9–12 grade-span grouping.
- A K–12 school could be compared within the K–5 grade-span grouping.

OPTION 2: Divide the grades the school serves by the grade-span groupings, then include the school in each grade-span grouping it crosses based on the grades:

- A K–6 school could be compared within both the K–5 and 6–8 grade-span groupings.
 - Grades K–5 would be compared within the K–5 grade-span grouping.
 - Grade 6 would be compared within the 6–8 grade-span grouping.
- A K–8 school could be compared within both the K–5 and 6–8 grade-span groupings.
- A 6–12 school could be compared within both the 6–8 and 9–12 grade-span groupings.
- A K–12 school could be compared within the K–5, 6–8, and 9–12 grade-span groupings.

Include leadership or other non-grade specific staff across grade spans in a reasonable manner.

OPTION 3: If the LEA has multiple schools serving grades that cross more than one grade-span grouping, and at least one of those schools is a Title I school, those schools may be compared as a separate grade-span grouping.

If all schools that serve grades crossing more than one grade-span grouping are non-Title I schools, option one or two must be used. Option 3 may not be used to exclude non-Title I schools from comparability determinations.

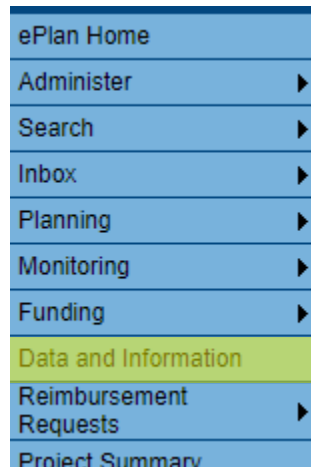
Examples for comparing multiple schools as a separate grade-span grouping include:

- If the LEA has multiple K–6 schools, **and at least one of those schools is a Title I school**, the schools may be compared within a separate K–6 grade-span grouping.
- If the LEA has multiple K–8 schools, **and at least one of those schools is a Title I school**, the schools may be compared within a separate K–8 grade-span grouping.
- If the LEA has multiple 6–12 schools, **and at least one of those schools is a Title I school**, the schools may be compared within a separate 6–12 grade-span grouping.
- If the LEA has multiple K–12 schools, **and at least one of those schools is a Title I school**, the schools may be compared within a separate K–12 grade-span grouping.

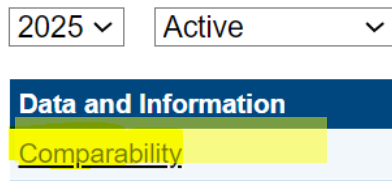
For each example above, if none of the schools are Title I, Option 1 or Option 2 must be used, and the schools **may not** be compared as a separate grade-span grouping.

Accessing and Navigating the Comparability Data and Information Report

To access the comparability Data and Information report, navigate to ePlan.tn.gov and from the menu on the left select **Data and Information** as highlighted below.



Click **Comparability** as highlighted below:

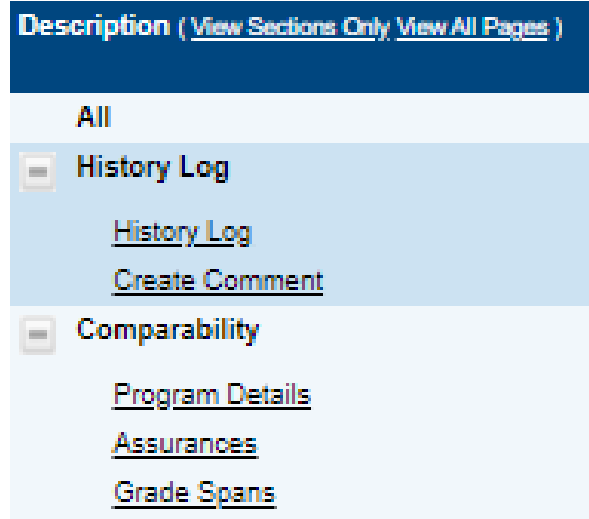


To begin the Data and Information report, select **Draft Started** as highlighted below:



Program Details Section

From the *Sections* page, select the *Program Details* page.



All LEAs will complete the *Program Details* pages to provide information about the LEA for the comparability report.

Local Educational Agency Information

Provide the LEA name and all contact information.

Submission Type and Comparability Basis

Check appropriate response indicating original submission or revised submission.

Assurances Section

The LEA must check that the LEA has established and implemented the following:

1. an LEA-wide salary schedule;
2. a policy to ensure equivalence among schools in teachers, administrators, and other staff; and
3. a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.
4. a policy ensuring the LEA's hiring practices meet state and federal licensure requirements (i.e. teachers must be licensed to teach in a TN public school) and teachers must be highly qualified; and
5. written procedures for complying with the comparability requirements.

"I understand that the LEA must document the implementation of the above policies, procedures, and salary schedules. I understand that demonstrating comparability is a prerequisite for receiving Title I, Part A funds. I attest to the accuracy of the information provided."

Grade Spans Section

Grade-span groupings must match the basic organization of schools in the LEA and should reflect the organization on the *School Eligibility* page, Title I section in the LEA's FY25 CFA.

- Users may delete grade spans by using the trash bin icon.
- Users may edit grade spans by clicking on the input box.
- Users may add grade spans by clicking on "Add Grade Span."

School Information Section

Excluded	School Name	Grade Span in Title I-A Application	* Grade Span	Service Type	Student Counts	
					* Enrollment	* Low Income
<input type="checkbox"/>	Alcoa Elementary	P4,PK,P3,K,1,2	K-2	SW	437	269
<input type="checkbox"/>	Alcoa High School	9,10,11,12	9-12	None	442	241
<input type="checkbox"/>	Alcoa Intermediate School	3,4,5	3-5	SW	482	232
<input type="checkbox"/>	Alcoa Middle School	6,7,8	6-8	None	687	281
Totals:					2048	1023

School List, Grade Span, and Enrollment by Grade Span

The number of Title I and Non-Title I Schools will automatically populate from Column 5 on this page.

All schools in the LEA, including charter schools, virtual schools, and small schools, should be listed in the second column.

- Select the grade span, based on the *School Eligibility* page, from the drop-down menu. In the third column, the grade spans reflect the information as entered in the FY25 CFA.
- Do not include pre-schools.

If applicable, complete the section regarding schools excluded with 100 or fewer students.

An LEA may choose to exclude schools with enrollments of 100 or fewer students from its comparability calculations. Please select the box in the first column if the school will be excluded.

- The ePlan and student enrollment must be based on the **current** school year and not on the prior year.

Enter the current school year student poverty count, not the D.C. x the multiplier used to allocate funds to schools in the CFA.

Other Personnel Supporting Instruction

Once the information from **Form III** has been completed, the FTE for Excluded State/Local, Actual Federal, and Actual State/Local needs to be input under Other Personnel Supporting Instruction.

Other Personnel Supporting Instruction			
* Excluded State/Local FTE (LEP/SWD)	* Actual Federal FTE	* Actual State/Local FTE	State/Local FTE for Comparability (1 FTE = .5 FTE)
<input type="checkbox"/> []	<input type="checkbox"/> 2.00	<input type="checkbox"/> 1.00	0.500
<input type="checkbox"/> []	<input type="checkbox"/> []	<input type="checkbox"/> []	0.000
<input type="checkbox"/> []	<input type="checkbox"/> []	<input type="checkbox"/> []	0.000

Form III is required for all LEAs and the completed form must be updated to the **Related Documents** in the Comparability Data and Information report in ePlan.

Complete **one** Form III for the LEA with a **tab for each school** in the LEA.

If the LEA opts to exclude other personnel directly supporting instruction (as defined below) from comparability determinations, the exclusion must be consistent for all schools in the LEA. The LEA must still submit **Form III** and note "Excluded" in the space provided

Within the same excel file, the tabs provided can be copied and renamed for each school. List all other personnel directly supporting instruction at each school.

Other personnel directly supporting instruction assigned to the school may include paraprofessionals and other non-licensed personnel such as social workers. Aides not involved in providing instructional support may not be included. Other personnel that may not be included are clerical, custodial, food service, transportation, and any other personnel not providing instructional support. Do not include any pre-school personnel.

The LEA must consistently include the same categories of staff members for both Title I and non-Title schools. See the instructions tab in the excel file for details to complete each field on the form.

A locally developed form may be used, but it must clearly delineate the same information indicated by this form.

All staff members from Form III that are being excluded must be entered in the "Excluded State/Local" Column and **removed** from the "Actual State/Local" Column. *Note if excluding LEP/SWD staff for Form III, the same exclusions must occur on Form II. Below*

Other Personnel Supporting Instruction

Excluded State/Local FTE (LEP/SWD)	* Actual Federal FTE	* Actual State/Local FTE	State/Local FTE for Comparability (1 FTE = .5 FTE)
<input checked="" type="checkbox"/> 1.00	<input type="checkbox"/>	<input type="checkbox"/>	0.000

Form II Section

Form II is required for all LEAs. Form II includes all licensed classroom teachers and other licensed personnel assigned to each school. This form is embedded in the Data and Information report. The licensed staff data is pulled from EIS and separated by schools.

- Instructional personnel includes all licensed classroom teachers and other licensed personnel assigned to the school who provide services that support instruction: principals, assistant principals, instructional coaches, librarians, music, art, and physical education teachers, guidance counselors, speech therapists, and licensed social workers and psychological personnel. Do not include any pre-school personnel.
- Within this section, the LEA must still complete the cells for Excluded State/local FTE (LEP/SWD), Federal FTE, and State/local FTE columns (3, 4, and 5, respectively). LEAs must enter these data for 2024–25 because FTE and funding source are not currently available in EIS. Note if you exclude state/local FTE (LEP/SWD) in Form II, the same exclusions must occur in Form III.
- Instructional personnel who are no longer at a school can be deleted utilizing the trash can beside the staff member’s name.



- Add Instructional personnel by clicking on the *Add New Personnel* button.

Add New Personnel

- The LEA **must** consistently include the same categories of staff members for both Title I and non-Title schools.
- If applicable, enter full-time equivalent (FTE) excluded from comparability calculations.
- For each person named, list his/her full-time equivalent (FTE) from federal funding, if any. If the person is paid partially from state/local funds and partially from federal funds, make the appropriate entry in each column.
- For each person named in column 1, list his/her full-time equivalent (FTE) from state/local funding, if any.
- The LEA must save (utilizing **Save and Go To**) after each school’s staff has been verified and FTE numbers have been added.
- Once an LEA has saved one school’s staff information, move to the next school utilizing the down arrow.

Black Fox Elementary School ▼

- All FTE data transfers to the *School Information* page from the *Form II* 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)	Excluded State/Local FTE (LEP/SWD)	Federal FTE	State/Local FTE
Zebra	Apple	Teacher	0.00	0.00	1.00
Totals:			0.00	0.00	1.00

Save And Go To ▶

Form II—EIS Staff Data Information

- EIS staff assignment data is used to pre-populate the name and assignment fields in Form II for licensed instructional staff that serve grades K-12. LEAs will access Form II in ePlan to complete the Excluded State/local FTE (LEP/SWD), Federal FTE, and State/local FTE (columns 3, 4, and 5, respectively).
- LEAs can add rows for licensed instructional staff serving grades K-12 who were not included in the data uploaded from EIS and block rows for staff who should not have been included in the data uploaded from EIS.
- However, LEAs can maximize the benefits of pre-population and reduce the revisions needed in ePlan by entering staff assignment data for licensed instructional staff that serve K-12 in SIS/EIS and using the *Staff Current Assignments* research query in EIS to ensure that the data are complete and accurate.
- FPO will do one mass upload of EIS staff data to ePlan. Only staff included in the upload will populate Form II in ePlan. Please collaborate with technology and EIS contacts to ensure that staff assignments for K-12 licensed instructional staff have uploaded successfully to EIS prior to the mass upload.

EIS Staff Table of Included K-12 Licensed Instructional Staff:

EIS K-12 Licensed Instructional Staff Assignments for Comparability Form II			
Code	Assignment	Code	Assignment
6A	Grade 6 ELA Teacher	GP	School Psychologist
6B	Grade 6 Math Teacher	HA	Grade 9 -12 English/Language Arts Teacher
6C	Grade 6 Science Teacher	HB	Grade 9 -12 Math Teacher
6D	Grade 6 Social Studies Teacher	HC	Grade 9 -12 Science Teacher
6E	Grade 6 Other Teacher	HE	Grade 9 -12 Social Studies Teacher
7A	Grade 7 ELA Teacher	HF	Grade 9-12 Fine Arts Teacher
7B	Grade 7 Math Teacher	HG	Grades 9-12 Other Teacher
7C	Grade 7 Science Teacher	HH	Home Bound Instructor
7D	Grade 7 Social Studies Teacher	HS	Grades 9-12 STEM Teacher
7E	Grade 7 Other Teacher	IC	Instructional Coach
8A	Grade 8 ELA Teacher	KG	Kindergarten Teacher
8B	Grade 8 Math Teacher	LB	Librarian
8C	Grade 8 Science Teacher	OI	Other Instructional - System Wide
8D	Grade 8 Social Studies Teacher	PH	High School Physical Education/Health
8E	Grade 8 Other Teacher	PR	Special Education Principal
8S	Grade 6-8 STEM Teacher	PS	Principal
AP	Assistant Principal	PW	CTE Principal
CU	School Curriculum Coordinator	RO	Junior ROTC
DL	Distance Learning	RS	Reading Specialist
EA	Art Teacher	RT	Interventionist (RTI)
EL	ESL Teacher	SC	School Counselor
EM	Music Teacher	SF	Special Education Teacher
EP	Elem/Middle Physical Education/Health	SI	Supervisor of Instruction
ES	Special Education Supervisor	SL	Audiologist / Hearing Specialist

EIS K-12 Licensed Instructional Staff Assignments for Comparability Form II			
Code	Assignment	Code	Assignment
ET	Computer Science	SR	Special Education Related Services
G1	Grade 1 Teacher	ST	Speech Specialist
G2	Grade 2 Teacher	SW	Social Worker
G3	Grade 3 Teacher	VP	Vision Program
G4	Grade 4 Teacher	VT	CTE Teacher
G5	Grade 5 Teacher	WL	World language
GI	Intellectually Gifted		Total

Source: Federal Programs and Oversight (FPO), Tennessee Department of Education.

For additional details, see EIS Data Dictionary Appendix I - Staff Current Assignments.

EIS Staff Table of Excluded K-12 Licensed Instructional Staff

Code	Assignment
AA	Attendance
AD	Adult Education Personnel
CF	Central Office
DF	Finance Director
DM	Student Data Management
DS	Superintendent
FO	Food Service
FS	Federal Supervisor
HR	Human Resource Personnel
IA	School Improvement & Accountability
MA	Materials Supervisor
ML	Active Duty Military
NO	Non-Instructional and Other Support Staff
PK	Pre-K Teacher
SA	Assistant Superintendent
SH	School Health Coordinator
SN	School Nurse
SU	Substitute
TA	Testing and Assessment Personnel
TH	Technology
TI	Transportation
UN	University

Source: Federal Programs and Oversight (FPO), Tennessee Department of Education.

For additional details, see EIS Data Dictionary Appendix I - Staff Current Assignments.

Comparability Method Section

Demonstrating comparability is a prerequisite for receiving Title I, Part A funds. Comparability is a requirement for all LEAs (unless the LEA has only one building per grade-span).

Comparability for One Building per Grade-Span

If the LEA has one school per grade span the message below will automatically populate.

Comparability Method for Others

A Title I school is deemed comparable if its student/staff ratio does not exceed 110 percent of the average student/staff ratio of non-Title schools.

If all schools in the LEA, or all schools within a particular grade span, are Title I a Title I school is deemed comparable if its student/staff ratio does not exceed 110 percent of the average student/staff ratio of Title I schools.

To ensure the LEA is comparable go to the *Comparability Method* page. Determine the method to demonstrate comparability by looking at each test result.

Comparability Method

Alcoa (051) Public District - FY 2020 - Comparability - Rev 0

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

Go To ▶

Comparability Method

- 1) 110% Student/Staff Ratio for Non-Title I Schools
- 2) 110% Student/Staff Ratio for Non-Title I Schools Within Grade Span
- 3) 110% Student/Staff Ratio for Title I Schools
- 4) 110% Student/Staff Ratio for Title I Schools Within Grade Span

* Selecting a comparability method is not required for districts with one-school per grade span.

- For each method, “Passed” must be in green by each school.
- LEAs may be comparable by using multiple methods but must select only one method.
- LEAs must select the method by selecting/filling in a bubble.

Comparability Method

Alcoa (051) Public District - FY 2020 - Comparability - Rev 0

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Go To ▶

Comparability Method

- 1) 110% Student/Staff Ratio for Non-Title I Schools
- 2) 110% Student/Staff Ratio for Non-Title I Schools Within Grade Span
- 3) 110% Student/Staff Ratio for Title I Schools
- 4) 110% Student/Staff Ratio for Title I Schools Within Grade Span

* Selecting a comparability method is not required for districts with one-school per grade span.

School Name	Grade Span	Service Type	1) 110% Student/Staff Ratio for Non-Title I Schools			2) 110% Student/Staff Ratio for Non-Title I Schools Within Grade Span			3) 110% Student/Staff Ratio for Title I Schools			4) 110% Student/Staff Ratio for Title I Schools Within Grade Span		
			Test Value	Actual Value	Test Result	Test Value	Actual Value	Test Result	Test Value	Actual Value	Test Result	Test Value	Actual Value	Test Result
Summary			Passing Schools: 1 / 2			Passing Schools: 0 / 2			Passing Schools: 1 / 2			Passing Schools: 2 / 2		
Alcoa Elementary	K-2	SW	13.32	12.40	Passed	N/A	12.40	Failed	15.09	12.40	Passed	13.64	12.40	Passed
Alcoa Intermediate School	3-5	SW	13.32	15.18	Failed	N/A	15.18	Failed	15.09	15.18	Failed	16.70	15.18	Passed

Go To ▶

Related Documents Section

Upload Form III, excel sheets for alternative methods (if applicable), letter of explanation for LEAs not in compliance by **Nov. 18**, and other supporting documents as applicable to the *Related Documents* section of the report.

Submission of Comparability

Once the entire comparability information within the Data and Information report has been completed, change the Data and Information report status to ***LEA ESSA Director Draft Completed***, then update the status to ***LEA Authorized Representative Approved***.

The Comparability Data and Information report must be completed and in ***LEA Authorized Representative Approved*** status by **Nov. 18, 2024**.

Appendices

Alternative Methods for Demonstrating Comparability

The standard method for demonstrating comparability is based on student/instructional staff ratio comparisons. **An alternative method may be considered with prior approval by the department.** (See the ***Approval of Alternative Methods*** section of this document for details.) Any method approved must be one that does not compromise the intent of the law for demonstrating comparability. The **Nov. 18, 2024** deadline applies to all alternative methods.

Alternative 1: Per-Pupil Budgeted Instructional Expenditures

An alternative method for demonstrating comparability is based on state and locally-funded per-pupil budgeted instructional expenditures. Instructional expenditures include **instructional staff and materials** and may not include capital expenditures, clerical, custodial, food service, transportation, etc.

A Title I school is comparable if the per-pupil budgeted instructional expenditures are at least 90 percent of the average per-pupil budgeted instructional expenditures of non-Title schools. If all schools in the LEA or all schools within a particular grade span are Title I, a Title I school is comparable if the per-pupil budgeted instructional expenditures are at least 90 percent of the average per-pupil budgeted instructional expenditures of Title I schools.

Instructional personnel includes all licensed classroom teachers and other licensed personnel assigned to the school who provide services that support instruction: principals, assistant principals, instructional coaches, librarians, music, art, and physical education teachers, guidance counselors, speech therapists, and licensed social workers and psychological personnel. Do not include any pre-school personnel.

Other personnel directly supporting instruction assigned to the school may include paraprofessionals and other non-licensed personnel such as social workers. Aides not involved in providing instructional support may not be included. Other personnel that may not be included are clerical, custodial, food service, transportation, and any other personnel not providing instructional support. Do not include any pre-school personnel.

When considering alternative programs, special education, and career technical education budgeted expenditure for comparability, these are optional and may be excluded from comparability. However, these budgeted expenditures must be included or excluded consistently across all schools and may not be selectively included in some schools but not others.

The following may not be included for comparability:

- Adult Education Program
- Adult Education Program Support
- Office of the Director of Schools
- Business Administration
- Human Services (Resources)/Personnel
- Operation and Maintenance of Plant
- Maintenance of Plant
- Transportation
- Operation of Non-Instructional Services
- Community Service
- Early Childhood Education Program
- Capital Outlay
- Capital Projects
- Debt Service

For this per-pupil budgeted instructional expenditures method, the following versions of Forms IV are available. Complete **the appropriate version(s)** of the Form IV file (IV-a; IV-b; IV-c; IV-d).

The LEA must determine which version(s) of Form IV are appropriate.

Comparing Title I schools to non-Title I schools:

- **Form IV-PPE-a** compares Title I schools to non-Title I schools on an LEA basis.
- **Form IV-PPE-b** compares Title I schools to non-Title I schools on a grade-span basis.

Comparing Title I schools to other Title I schools:

- **Form IV-PPE-c** compares each Title I school to all Title I schools on an LEA basis.
- **Form IV-PPE-d** compares each Title I school to all Title I schools on a grade-span basis.

The comparability Data and Information report, along with required forms, must be completed by all LEAs regardless of the method used to demonstrate comparability. All alternative forms must be uploaded to the Related Documents section within the comparability Data and Information report.

Alternative 2: Student / Instructional Staff Salary Ratios

An alternative method for demonstrating comparability is based on student/instructional staff salary ratios for state and locally-funded instructional staff.

A Title I school is comparable if the student/instructional staff salary ratio is at least 90 percent of the average student/instructional staff salary ratio of non-Title schools. If all schools in the LEA or all schools within a particular grade span are Title I, a Title I school is comparable if the student/instructional staff salary ratio is at least 90 percent of the average student/instructional staff ratio of Title I schools.

Instructional personnel includes all licensed classroom teachers and other licensed personnel assigned to the school who provide services that support instruction: principals, assistant principals, instructional coaches, librarians, music, art, and physical education teachers, guidance counselors, speech therapists, and licensed social workers and psychological personnel. Do not include any pre-school personnel.

Other personnel directly supporting instruction assigned to the school may include paraprofessionals and other non-licensed personnel such as social workers. Aides not involved in providing instructional support may not be included. Other personnel that may not be included are clerical, custodial, food service, transportation, and any other personnel not providing instructional support. Do not include any pre-school personnel.

When considering alternative programs, special education, and career technical education budgeted expenditure for comparability, these are optional and may be excluded from comparability. However, these budgeted expenditures must be included or excluded consistently across all schools and may not be selectively included in some schools but not others.

For this salary method, the following versions of Forms IV are available. Complete **the appropriate version(s)** of the Form IV file (IV-a; IV-b; IV-c; IV-d). The LEA must determine which version(s) of Form IV are appropriate.

Comparing Title I schools to non-Title I schools:

- **Form IV-SAL-a** compares Title I schools to non-Title I schools on an LEA basis.
- **Form IV-SAL-b** compares Title I schools to non-Title I schools on a grade-span basis.

Comparing Title I schools to other Title I schools:

- **Form IV-SAL-c** compares each Title I school to all Title I schools on an LEA basis.
- **Form IV-SAL-d** compares each Title I school to all Title I schools on a grade-span basis.

The comparability Data and Information report, along with required forms, must be completed by all LEAs regardless of the method used to demonstrate comparability. All alternative forms must be uploaded to the Related Documents section within the comparability Data and Information report.

Alternative 3: School Size – Large and Small Schools

If the LEA has first shown it is unable to demonstrate comparability using the standard method based on student/instructional staff ratio comparisons, this alternative method may be considered for approval by the department.

This alternative is based on student/instructional staff ratios for state and locally-funded instructional staff but allows for comparison based on school size. Schools must be identified as belonging to either a group of large schools or one of small schools. Each group of schools must consist of at least two schools. At least one school in each group must be a Title I school.

When determining whether a school is considered in the large or small group, there must be a significant difference in the enrollments of schools. At a minimum, the largest school must have an enrollment that is at least two times the enrollment of the smallest school. Schools in the large group are compared to one another and schools in the small group are compared to one another.

Alternative 4: School Poverty – High and Low Poverty

If the LEA has first shown it is unable to demonstrate comparability using the standard method based on student/instructional staff ratio comparisons, this alternative method may be considered for approval by the department.

This alternative is based on student/instructional staff ratios for state and locally-funded instructional staff but allows for comparison based on school poverty. Schools must be identified as belonging to either a group of high poverty schools or one of low poverty schools. Each group of schools must consist of at least two schools. At least one school in each group must be a Title I school.

Schools with poverty of 60 percent and greater would be considered in the high poverty group and the remaining schools would be considered in the low poverty group. Schools in the high poverty group are compared to one another and schools in the low poverty group are compared to one another.

Approval of Alternative Methods

An alternative method may be considered with prior approval by the department. Any method approved must be one that does not compromise the intent of the law for demonstrating comparability. **The Nov. 18, 2024** deadline applies to all alternative methods.

- **Alternative 1:** Request for approval must be received by the department no later than **Nov. 8.**
- **Alternative 2:** Request for approval must be received by the department no later than **Nov. 8.**
- **Alternative 3:** When requesting approval to use this alternative, the LEA must complete the comparability Data and Information report along with Forms II-III showing the results of the standard method. Requests for approval must be received by the department no later than **Nov. 8.**
- **Alternative 4:** When requesting approval to use this alternative, the LEA must complete the comparability Data and Information report along with Forms II-III showing the results of the standard method. Requests for approval must be received by the department no later than **Nov. 8.**

Title I, Part A [ESSA § 1118] Fiscal Requirements

(a) MAINTENANCE OF EFFORT -A local educational agency may receive funds under this part for any fiscal year only if the State educational agency involved finds that the local educational agency has maintained the agency's fiscal effort in accordance with section 7901 of this title.

(b) FEDERAL FUNDS TO SUPPLEMENT, NOT SUPPLANT, NON-FEDERAL FUNDS

(1) IN GENERAL - A State educational agency or local educational agency shall use Federal funds received under this part only to supplement the funds that would, in the absence of such Federal funds, be made available from State and local sources for the education of students participating in programs assisted under this part, and not to supplant such funds.

(2) COMPLIANCE - To demonstrate compliance with paragraph (1), a local educational agency shall demonstrate that the methodology used to allocate State and local funds to each school receiving assistance under this part ensures that such school receives all of the State and local funds it would otherwise receive if it were not receiving assistance under this part.

(3) SPECIAL RULE - No local educational agency shall be required to—

(A) identify that an individual cost or service supported under this part is supplemental; or

(B) provide services under this part through a particular instructional method or in a particular instructional setting in order to demonstrate such agency's compliance with paragraph (1).

(4) PROHIBITION - Nothing in this section shall be construed to authorize or permit the Secretary to prescribe the specific methodology a local educational agency uses to allocate State and local funds to each school receiving assistance under this part.

(5) TIMELINE -A local educational agency—

(A) shall meet the compliance requirement under paragraph (2) not later than 2 years after December 10, 2015; and

(B) may demonstrate compliance with the requirement under paragraph (1) before the end of such 2-year period using the method such local educational agency used on the day before December 10, 2015.

(c) COMPARABILITY OF SERVICES

(1) IN GENERAL

(A) COMPARABLE SERVICES - Except as provided in paragraphs (4) and (5), a local educational agency may receive funds under this part only if State and local funds will be used in schools served under this part to provide services that, taken as a whole, are at least comparable to services in schools that are not receiving funds under this part.

(B) SUBSTANTIALLY COMPARABLE SERVICES - If the local educational agency is serving all of such agency's schools under this part, such agency may receive funds under this part only if such agency will use State and local funds to provide services that, taken as a whole, are substantially comparable in each school.

(C) BASIS - A local educational agency may meet the requirements of subparagraphs (A) and (B) on a grade span by grade-span basis or a school-by-school basis.

(2) WRITTEN ASSURANCE

(A) EQUIVALENCE - A local educational agency shall be considered to have met the requirements of paragraph (1) if such agency has filed with the State educational agency a written assurance that such agency has established and implemented—

(i) a local educational agency-wide salary schedule;

(ii) a policy to ensure equivalence among schools in teachers, administrators, and other staff; and

(iii) a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.

(B) DETERMINATIONS - For the purpose of this subsection, in the determination of expenditures per pupil from State and local funds, or instructional salaries per pupil from State and local funds, staff salary differentials for years of employment shall not be included in such determinations.

(C) EXCLUSIONS - A local educational agency need not include unpredictable changes in student enrollment or personnel assignments that occur after the beginning of a school year in determining comparability of services under this subsection.

(3) PROCEDURES AND RECORDS - Each local educational agency assisted under this part shall—

(A) develop procedures for compliance with this subsection; and

(B) maintain records that are updated biennially documenting such agency's compliance with this subsection.

(4) INAPPLICABILITY - This subsection shall not apply to a local educational agency that does not have more than one building for each grade span.

(5) COMPLIANCE - For the purpose of determining compliance with paragraph (1), a local educational agency may exclude State and local funds expended for—

(A) language instruction educational programs; and

(B) the excess costs of providing services to children with disabilities as determined by the local educational agency.

(d) EXCLUSION OF FUNDS - For the purpose of complying with subsections (b) and (c), a State educational agency or local educational agency may exclude supplemental State or local funds expended in any school attendance area or school for programs that meet the intent and purposes of this part.

Sample—LEA Procedures for Demonstrating Title I Comparability Compliance

Demonstrating comparability is a prerequisite for receiving Title I, Part A funds. Because Part A allocations are made annually, comparability is an **annual requirement**. The LEA must perform comparability calculations every year to demonstrate that all of its Title I schools are in fact comparable and make adjustments if any are not. An LEA must develop procedures for complying with comparability requirements. [ESEA § 1120A(c)(3)]

1. **Responsible Office:** It is the responsibility of _____ (insert office name and job title of designated staff) to ensure that the LEA remains in compliance with the Title I comparability requirements. The designated office will oversee the process to ensure all procedures are followed and all deadlines are met.
2. **Deadlines:** No later than the yearly due date the LEA shall annually complete the comparability Data and Information report and upload to ePlan the required forms to the Tennessee Department of Education (the department) demonstrating comparability.
3. **Basis for Demonstrating Comparability:** The LEA may calculate comparability on an LEA or grade-span basis.
4. **Data Collection:** It is the responsibility of _____ (insert office name and job title of designated staff) to collect all data from the appropriate LEA office(s), that are required by the department to demonstrate comparability. The designated office will ensure all required data is submitted to appropriate staff within the defined timeline.
5. **Data Verification:** It is the responsibility of _____ (insert office name and job title of designated staff) to verify the accuracy of the data used to demonstrate comparability and to ensure the calculations are performed correctly using the method established by the department.
6. **Reallocation:** If the initial calculations indicate that a school is not receiving comparable services,
 - a. _____ (insert office name and job title of designated staff) will be immediately notified. The LEA will then take immediate steps, as early in the school year as possible and with minimum disruption to the learning environment, that are necessary to demonstrate comparability for all Title I schools. Appropriate steps may include, but need not be limited to, reallocation of funding sources and/or reassignment of personnel. Reallocations must be determined no later than Dec. 1 of the same school year and all corrected comparability forms uploaded to ePlan.
7. **Records:** It is the responsibility of _____ (insert office name and job title of designated staff) to ensure that all comparability reports, records, and source documentation of the LEAs comparability analysis and calculations are retained for at least five years for audit purposes. An LEA organizational chart must also be included as part of the records. In addition, the LEA will maintain up-to-date records of having established and implemented an agency- wide salary schedule; policies ensuring equivalence among schools in teachers, administrators, and other staff; equivalence among schools in the provision of curriculum materials and instructional supplies; ensuring the LEA's hiring practices meet state and federal licensure requirements; teachers are highly effective; and written LEA comparability procedures.
8. **Complaints:** It is the responsibility of _____ (insert office name and job title of designated staff) to handle all complaints from parents, community members or LEA and school staff members, that a school is not receiving comparable services.

Sample—LEA Comparability Timeline

The timeline below is a sample the LEA may follow to ensure all LEA-level comparability procedures are carried out and comparability is demonstrated for all Title I schools.

Jan.–April

- Engage in LEA-level budget (state and local funds) discussions concerning the allocation of instructional staff (i.e. hiring additional teachers) and resources to schools for the upcoming school year to ensure compliance with Title I comparability requirements.

May–June

- Conduct meetings with appropriate LEA representatives to discuss the requirements for completing the annual comparability calculations.
- Establish participant roles and responsibilities.
- Select the basis for demonstrating comparability that will be used for calculations (LEA or grade-span basis).
- Continue to engage in LEA-level discussions concerning the allocation of instructional staff (i.e. hiring additional teachers) and resources to schools for the upcoming school year to ensure compliance with Title I comparability requirements.

July–Aug.

- Obtain preliminary information from appropriate LEA staff.
- Identify LEA Title I and non-Title I schools.
- Identify date and collection methodologies for gathering data needed to complete calculations.

Sept.–Oct.

- Collect data.
- Meet with appropriate LEA staff and calculate comparability.
- Make necessary reallocation of resources to ensure comparability of Title I schools shown not to be comparable.
- Maintain all required documentation supporting the comparability calculations and any corrections made to ensure that all Title I schools are comparable.

Nov.

- Reconvene appropriate LEA staff to address any outstanding issues that have arisen, such as, notification from the department of non-compliance of any Title I schools.
- Make necessary reallocation of resources to ensure comparability of Title I schools shown not to be comparable.
- No later than **Nov. 18**, complete the Comparability Data and Information report in ePlan.tn.gov

Dec.

- No later than **Dec. 1** of the same school year, make the corrected comparability changes in the Comparability Data and Information report in ePlan.tn.gov