

Title I, Part A Comparability

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Agenda

- Comparability: A Fiscal Test
- Illustrating Comparability
- What are we Comparing?
- Grade Span Grouping
- Comparability Overview
- Review Process for Documenting Comparability
 - Comparability Form in ePlan
 - Application Supplement in ePlan
- Resources



Comparability Overview

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 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 make adjustments if any are not comparable.

Comparability: A Fiscal Test

Comparability: A Fiscal Test

- Title I, Part A has three (3) fiscal tests:
 1. supplement not supplant,
 2. comparability, and
 3. maintenance of effort.
- These tests support the requirement that Title I, Part A funds are supplementary to state and local financial resources. *ESSA § 1118(c)*



Comparability: A Fiscal Test

- Comparability is a school-level calculation that measures the level of state and local funds being provided to Title I and non-Title I schools.
- Comparability helps ensure that Title I schools are receiving state and local funds and services that are, at least, equal to the services being provided to non-Title I schools.

Comparability: A Fiscal Test

- Comparability is an annual requirement.
- Tennessee requires reporting of comparability testing and documentation every year.
- LEAs are required to have a written procedure for calculating comparability.

Illustrating Comparability

Schools in the LEA

Schools in a District



Title I



Title I



Title I



Non-Title



Non-Title



Non-Title

Allocating State & Local Funds to Schools

Comparable State & Local Funds at Title I Schools



Title I



Title I



Title I



Non-Title



Non-Title



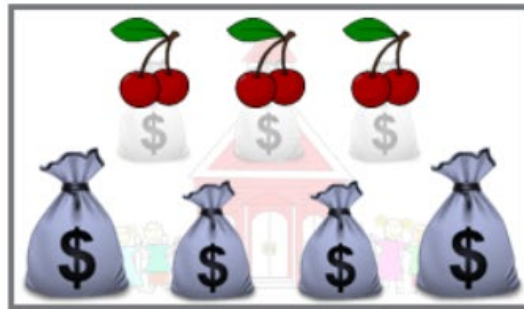
Non-Title

Allocating Title I Funds to Title I Schools

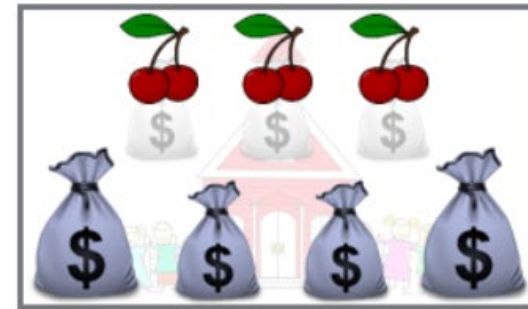
SUPPLEMENTAL Title I Funds
are Like the Cherry On Top of State & Local Funds



Title I



Title I



Title I



Non-Title



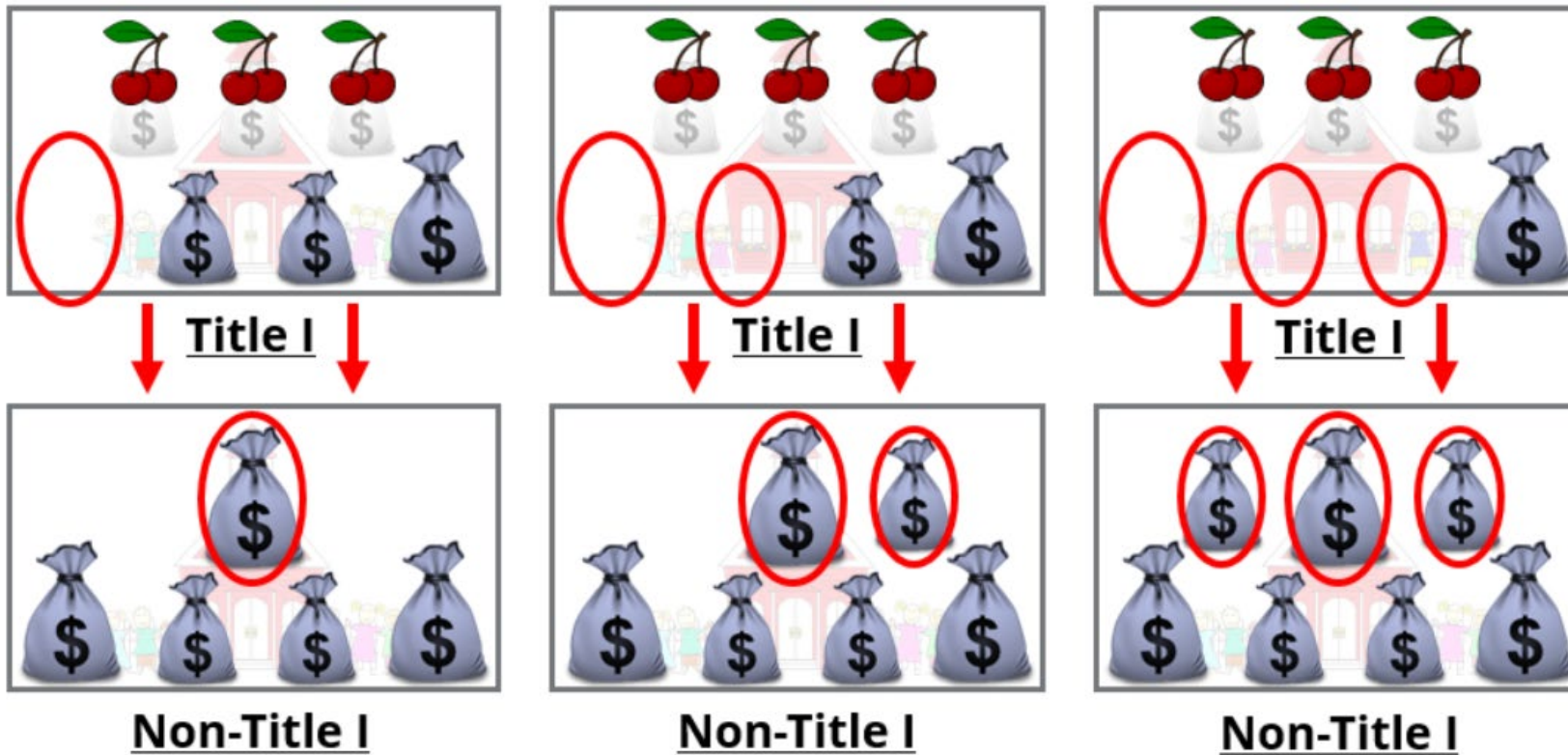
Non-Title



Non-Title

Are Title I Schools Comparable?

State & Local Funds Cannot be Limited at Title I Schools and Increased at Non-Title I Schools



Comparability: What are we comparing?

Comparability: What are we comparing?

- The following baselines are used as a starting point to conduct a comparability test:

LEA-Wide Basis

- Title I Schools are compared to non-Title I schools

Grade Bands/Spans Basis

- Title I schools are compared to non-Title I schools

Alternative Basis

- Large schools are compared to small schools
- High poverty schools are compared to lower poverty schools.

Note: If all schools in the LEA are Title I schools, then Title schools are **compared to one another** either through a LEA-wide or grade span basis.

Comparability: What are we comparing?

- When comparing schools, there are three (3) methods available to LEAs:

Student-Instructional Staff Ratio

- Compares the distribution of instructional staff (FTEs) (Tennessee's default method)

Per-Pupil Expenditures

- Compares state and local allocation per student including instructional staff and materials (alternative method)

Salary Equivalence

- Compares school instructional salaries (Not used in TN)

- **Note:** Instructional staff includes teachers, principals, assistant principals, teacher assistants, music, art, and CTE teachers. **Do not include** secretaries, custodial, and other facility support personnel.

Comparability: What are we comparing?

- Possible exclusions from the method:
 - Language instruction education programs
 - Excess costs in providing special education services
 - LEA has one building per grade span
 - Schools with less than 100 students

Grade Span Grouping

Grade Span Grouping

- 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 primarily 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 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.



Grade Span Grouping

- Defined grade span groupings for comparability must take into consideration which grades the LEA serves with Title I, Part A 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.

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.

Navigating the Comparability Application Supplement

Location of Comparability Application Supplement

- <http://eplan.tn.gov>
- *Data and Information*

Organization Number:

County:

All

Fiscal Year:

2025

Data and Information:

CBO ePlan User AuditCharter School ePlan User AuditCharter School Interscholastic Athletics CertificationCivil Rights and Bullying Compliance ReportComparability (2025 & 2026)

Information State:

All

Information Status:

AllNot StartedDraft StartedRevision StartedLEA Consolidated Director Draft CompletedLEA Consolidated Director Revision CompletedLEA Authorized Representative ApprovedLEA Authorized Representative Returned Not Approved

Organization Contact:

All

Special Options:

Search

Reset

Showing record(s). Displaying 1 through 25. [\[Bulk Email\]](#) [\[Download Data\]](#) [\[Summary\]](#)

<< First

< Previous

Organization Number	Organization Name	County	Data and Information	
185	Achievement School District	Davidson	Comparability (2025 & 2026)	
71	Alamo	Crockett	Comparability (2025 & 2026)	
51	Alcoa	Blount	Comparability (2025 & 2026)	
61	Alvin C York Institute	Fentress	Comparability (2025 & 2026)	
10	Anderson County	Anderson	Comparability (2025 & 2026)	

Comparability Application Supplement: Section Page

Status: TDOE FPO Divisional Coordinator Reviewed

Change Status To: [TDOE FPO Director Approved](#)
or
[TDOE FPO Director Returned Not Approved](#)
or
[TDOE FPO Director Returned to LEA](#)

[View Change Log](#)

Description (View Sections Only View All Pages)		Validation	Print ☐ Select Items
All		Messages	Print
 History Log			Print
History Log			Print
Create Comment			
 Comparability (2025 & 2026)		Messages	Print
2025 Program Details			
2025 Assurances			
Grade Spans			Print
School Information			Print
Form II			Print
Comparability (2025 & 2026) Method			Print
2025 Related Documents		Messages	
All		Messages	Print

[Return](#)

Comparability Application Supplement: Grade Spans

- Grade Spans: Allows the LEA to set up the grade spans groupings for the LEA.
- **Note:** Grade span groupings must match the *School Eligibility* page in the LEA's **FY26 CFA**.

Grade Spans

Public District - FY 2020 - Comparability - Rev 0

Save And Go To ▶

Actions	Grade Span
  	K-5
  	6-8
  	9-12
  	K-12

[Add Grade Span](#)

Save And Go To ▶

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				
Anderson County (010) Public District - 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.
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Comparability Application Supplement: Licensed Instructional Staff

- This data is on the School Information section
- Licensed Instructional Staff will pull from the Form II section within the *Comparability Application Supplement*.
- Ensure all data pulled from 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*.
- Note: LEAs have the capability this year to exclude staff utilizing the check box beside each row for support staff.
- Ensure consistency for exclusions among each school.

School Name	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)
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 name and assignment for K–12 licensed instructional staff with assignments in EIS.
- The data was pulled from the Oct. 1 count from EIS.
- Staff is listed by each school.
- The data from this page pulls into the instructional staff counts on the School Information page

Form II

Bradley County (060) 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
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 the 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 *Comparability Application Supplement* drop-down arrow to check for accuracy and add the FTE count for each staff member.
- Repeat with each school in the LEA.

LAST Name of Employee	FIRST Name of Employee	Position (Please be specific)	Excluded State/Local FTE (LEP/SWD)	Federal FTE	State/Local FTE
			0.00	0.00	0.00
Zebra	Apple	Teacher	0.00	0.00	0.00
Totals:			0.00	0.00	0.00

Comparability Application Supplement: Comparability Method

Anderson County (010) Public District - FY 2020 - Comparability - Rev 0

Go To 

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

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.

Other Required Forms

- Form III
- Written Procedures
- Source Documentation



Uploading a File to ePlan

- **Form III** is an Excel file which must be completed and uploaded to the ***Related Documents section*** of the Comparability Application Supplement that contains support personal for each school.
- Note other forms in the ***Related Documents section*** other than Form III 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 Procedure

- 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.

If Schools Are Not Comparable

- If the LEA is unable to demonstrate comparability by the deadline, the LEA must still **upload all required forms by due date *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 **Jan. 1** of the same school year.



Resources and Technical Assistance

Comparability Guidance

- Comparability Guide
- **Webinar:**
 - Will be uploaded to TDOE Resources
- **Contact Divisional Coordinators:**
 - West: Lynn.Dotson@tn.gov
 - Middle: Alisha.Gilmore@tn.gov
 - East: Henry.LaFollette@tn.gov
 - Top 20 Most Populous LEAs: Heather.Farley@tn.gov



Please share your session feedback



You may access the PD Survey by navigating here:

<https://forms.office.com/r/sbRAwQUV0d>



Thank You!

Contact Info or Questions?

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