

ESSA Comparability

What's New for FY26

Background

Due to internal process shifts, please note the following when completing Comparability for FY26:

- Comparability for FY26 will be submitted via the FY25 Comparability instrument in ePlan.
 - Navigate to ePlan > Data and Information > Comparability.
 - The instrument is titled *Comparability (2025 & 2026)*.
- Local educational agencies (LEAs) will be required to update the information that was submitted in FY25 to include current FY26 data.
- FY25 Comparability submissions are archived in ePlan. No Comparability data will be lost or deleted.
- **IMPORTANT:** LEAs should refer to the [FY25 Comparability Procedures Guide](#) for more detailed guidance on compliance requirements, LEA procedures, basis for demonstrating comparability, grade span grouping, and the needed appendices (i.e., alternative methods, fiscal requirements, and samples).

Timeline

FY26 Comparability opens **Oct. 15, 2025**, and is due in ePlan **Nov. 20**. If an LEA needs an alternative method, email Heather.Farley@tn.gov by **Nov. 14**.

Instructions

- Navigate to Data and Information and select fiscal year 2025, then select *Comparability*.

The screenshot shows the 'Data and Information' section of the ePlan system. At the top, it says 'Public District - FY 2026'. Below this, there is a dropdown menu with '2025' selected and an 'Active' button. A list of links is provided, with 'Comparability' highlighted in yellow at the bottom.

- Once in the Comparability instrument, select *Revision Started*.
- From the *Sections* page, select the **2026 Program Details** page.

Save And Go To ▶

Local Education Agency (LEA) Information

* LEA Name

* Mailing Address

* Director of Schools

* Name of Responsible LEA Official

* Responsible LEA Official's Title

* Official's Telephone

* Official's Email

School Change(s): Were there any school changes in the FY26 Consolidated Funding Application (CFA) that were not included in the FY25 CFA?
 What kind of school changes were there in FY26?

1. **Removed School(s):** If no schools were added, but schools were removed, any removed schools should be **Excluded** on the **School Information** page.
 2. **Added School(s):** Schools added to the FY26 CFA will not be available on the **School Information** page.
 * Please indicate below which form will be uploaded in this revision to show the 2026 Comparability that will include the added schools.

Which comparability form will be uploaded in the 2026 Related Documents?

Submission Type

* Select one appropriate response

☐ This report is an original submission uploaded to ePlan no later than November 20.

☐ This is a revised submission, following the reallocation of resources to ensure comparability, and is submitted not later than December 1.

Data Collection Date

* Required for the CURRENT school year (date must be between the first day of school and 10/31/2025). Applies to all data: school list, student enrollment, number low income students, personnel FTE by funding source, etc.

- Update the LEA name and all contact information as needed.
- School Change(s) has been added this year due to the inability to move the schools from the FY26 CFA. Only FY25 CFA schools will auto populate into the instrument.
- If a school(s) was added, or there was a Title I status change of any school, the LEA will likely need to complete one of the four original Excel sheets housed in the **2026 Related Documents** page. Below are the four original Excel sheets. (Reminder: alternative methods require a request for approval.)
 - Form IV-a - District basis Non-Title I to Title I Comparison
 - Form IV-b - Grade-span basis Non-Title I to Title I Comparison
 - Form IV-c - District basis Title I to Title I Comparison
 - Form IV-d - Grade-span basis Title I to Title I Comparison
- Check the appropriate response indicating original submission or revised submission and update the Data Collection Date.
- Navigate to the **2026 Assurances** page. The LEA must check the box to agree.

- On the **Grade Spans** page, groupings must match the basic organization of schools in the LEA and should reflect the organization on the Title I, Part A *School Eligibility* page in the LEA's FY26 CFA.

- Last year's (FY25) data will be auto populated. Update the data to reflect FY26 groupings.
 - 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 "Add Grade Span."

- On the **School Information** page, the number of Title I and Non-Title I Schools will automatically populate from Column 5.

- The schools listed in the second column were auto populated from the FY25 CFA in the LEA, including charter schools and small schools.

Note: If there is a Title I status change of any school, the LEAs will most likely need to complete one of the four original Excel sheets housed in the **2026 Related Documents** page.

(Reminder: alternative methods require a request for approval)

- Form IV-a - District basis Non-Title I to Title I Comparison
 - Form IV-b - Grade-span basis Non-Title I to Title I Comparison
 - Form IV-c - District basis Title I to Title I Comparison
 - Form IV-d - Grade-span basis Title I to Title I Comparison
- 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 FY26 CFA.
- Do not include pre-schools.

School Information							
Public District - FY 2025 - Comparability (2025 & 2026) - Rev 2							
This is the LEA's site. Please be sure to complete your work in the LVC site. Test Database refreshed Oct 1, 2023							
Save And Go To							
Total Number of Title I Schools: 35							
Total Number of Non-Title I Schools: 59							
<< First < Previous							
Excluded	School Name	Grade Span in Title I, Part A Application	* Grade Span	Service Type	Student Counts		
					* Enrollment	* Low Income	
☐	A L Lotts Elementary	K,1,2,3,4,5	K-5	None	900	200	
☐	Adrian Burnett Elementary	K,1,2,3,4,5	K-5	SW	600	275	
☐	Amherst Elementary School	N,K,1,2,3,4,5	K-5	None	643	222	
☐	Austin East High/Magnet	9,10,11,12	9-12	SW	666	431	
☐	Ball Camp Elementary	K,1,2,3,4,5	K-5	None	548	138	

- 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.

- This fiscal year, schools that are closed must be excluded and all zeroes placed in the corresponding boxes.
- The ePlan and student enrollment must be based on the current school year and not on the prior year's projections.
- 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: *Form III* is required for all LEAs, and the completed form must be uploaded to the **2026 Related Documents** page.
 - 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 who 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 I schools. See the instructions tab in the Excel file for details on completing each field on the form.
 - A locally developed form may be used, but it must delineate the same information indicated by this form.
 - All staff members from *Form III* who are being excluded must be entered in the "Excluded State/Local" Column.

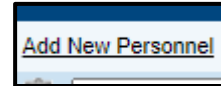
Note: If excluding LEP/SWD staff for *Form III*, the same exclusions must occur on *Form II*.

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)	
☐ []	☐ [2.00]	☐ [1.00]	0.500	
☐ []	☐ []	☐ []	0.000	
☐ []	☐ []	☐ []	0.000	

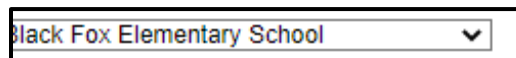
- **Form II** is required for all LEAs. *Form II* includes all licensed classroom teachers and other licensed personnel assigned to each school. The data included was pulled from last year's Oct. 1, 2024, EIS data and is separated by schools. LEAs must update the information on this page to reflect FY26 data.
 - Instructional personnel include 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 full-time equivalent (FTE) (LEP/SWD), Federal FTE, and State/local FTE columns (3, 4, and 5, respectively).
- Instructional personnel who are no longer at a school can be deleted by utilizing the trash can beside the staff member's name.
- Add Instructional personnel by clicking the *Add New Personnel* button.



- The LEA must consistently include the same categories of staff members for both Title I and Non-Title I schools.
- If applicable, enter FTE excluded from comparability calculations.
- For each person named, list the person's 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 the person's FTE from state/local funding, if any.
- The LEA must save (utilizing **Save and Go To** at the top of the page) 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 by utilizing the down arrow.



- All FTE data transfers to the *School Information* page from the *Form II* page.
 - Add FTE amounts for state and local funding for new schools to the appropriate Form IV Excel Sheet, along with using the School Information page to input the other schools' information.
- On the **Comparability (2025 & 2026) Method** page, the LEA must determine the method to demonstrate comparability.
 - 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 I schools.
 - If all schools within an LEA, or all schools within a specific grade span, are Title I, then a Title I school is considered comparable if its student-to-staff ratio does not exceed 110 percent of the average student-to-staff ratio across all Title I schools.

Comparability (2025 & 2026) Method

FY 2025 - Comparability (2025 & 2026) - Rev 1

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. Only one is needed to be comparable.
 - LEAs must select the method by selecting/filling in a bubble.
 - 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).
 - If the LEA has one school per grade span, selecting a comparability method is not required.
- Once the entire Comparability instrument 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**.
 - **No later than Nov. 20**, the LEA shall annually demonstrate if comparability requirements have been met via the Comparability Data and Information report on ePlan.tn.gov.
 - All required forms must be uploaded to the Comparability 2026 *Required Documents* section when it is submitted.
 - If an LEA is unable to demonstrate comparability by the Nov. 20 deadline, it must complete the Comparability instrument in ePlan, upload all required forms by Nov. 20, *and* include a letter stating that comparability was not met and that the LEA understands it must make necessary adjustments within the same school year.
 - If the initial submission is found to be noncomparable due to a data, calculation, or procedural error, the department will notify the LEA that adjustments are required.
 - If adjustments are needed to demonstrate comparability, the LEA must revise the Comparability Data and Information report, upload the updated forms, and submit a letter detailing the adjustments made. All revised materials must be uploaded to ePlan no later than **Dec. 1** of the same school year.