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2026 Federal Programs Institute

Comparability – Title I, Part A

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Federal Programs Institute 2026



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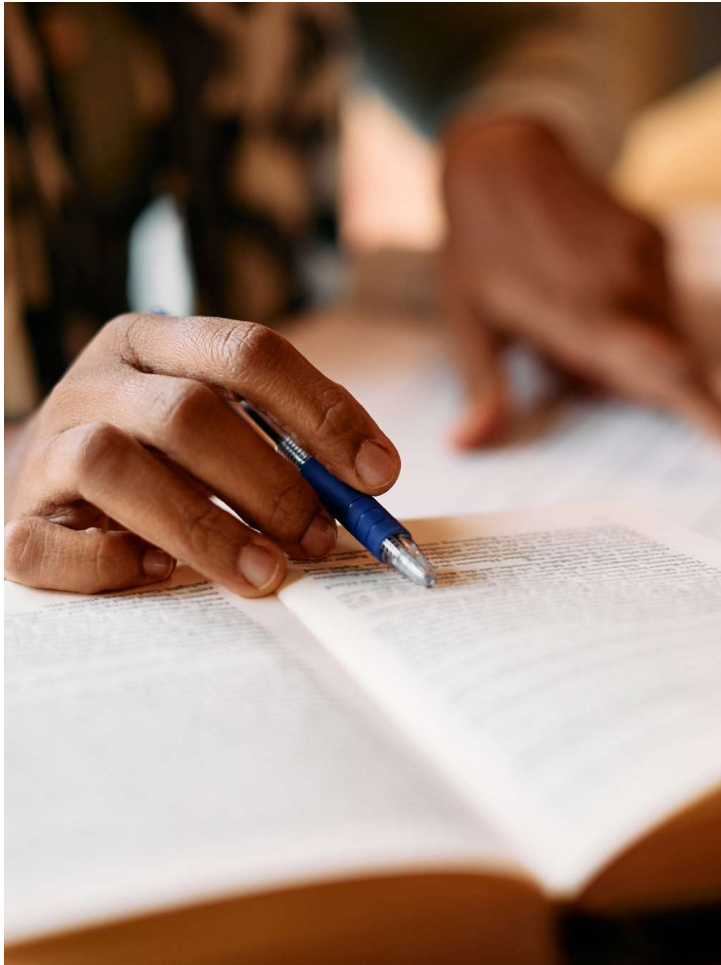
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While the State supports your desire to maintain documentation of the meeting and what you learn, **please respect our decision to safeguard information** and do not attempt to use tools such as these. If you choose to use a tool such as this, the State will block that tool from the meeting.

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Agenda

- Comparability: A Fiscal Test
- Illustrating Comparability
- What are We Comparing?
- Process of Completing the Comparability Supplement
- Alternative Methods
- Resources and Supports

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Comparability: A Fiscal Test

Comparability: A Fiscal Test, Part 1

- 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)*

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Comparability: A Fiscal Test, Part 2

- 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.

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Comparability: A Fiscal Test, Part 3

- Comparability is an annual requirement
- LEAs are required to have a written procedure for calculating comparability.



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Illustrating Comparability

TN

Department of
Education

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

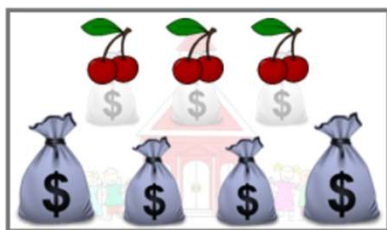


Non-Title

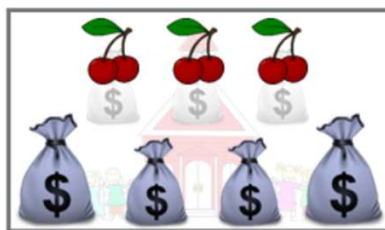
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Allocating Title I Funds to Title I Schools

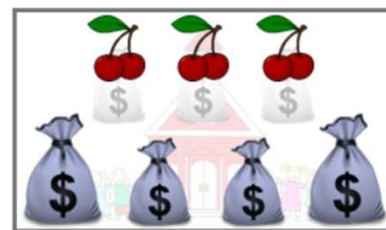
SUPPLEMENTAL Title I Funds
are Like the Cherry On Top of State & Local Funds



Title I



Title I



Title I



Non-Title



Non-Title

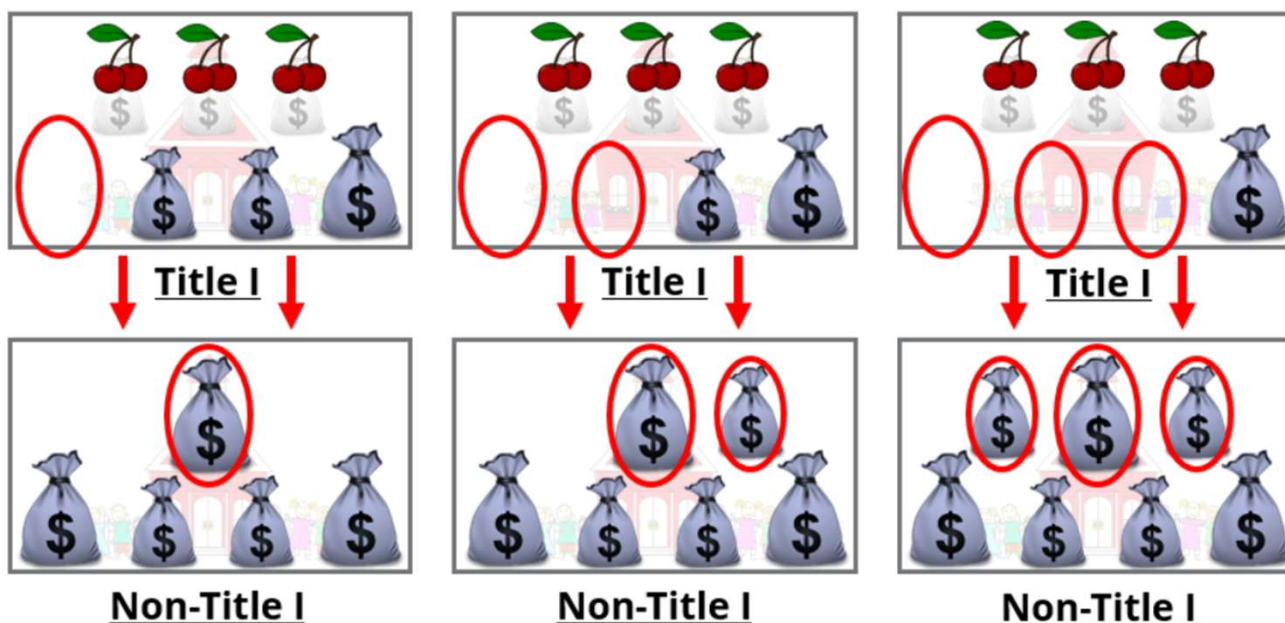


Non-Title

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Are Title I Schools Comparable?

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



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Comparability: What are we comparing?

Comparability: What are we comparing? Part 1

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

LEA-Wide Basis	Grade Bands/Spans Basis	Alternative Basis
• Title I Schools are compared to non-Title I schools	• Title I schools are compared to non-Title I schools	• 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 I schools are compared to one another on an LEA-wide or grade-span basis.

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Comparability: What are we comparing? Part 2

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

Student-Instructional Staff Ratio	Per-Pupil Expenditures	Salary Equivalence
○ Compares the distribution of instructional staff (FTEs) (Tennessee's default method)	○ Compares state and local allocation per student including instructional staff and materials (alternative method)	○ 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? Part 3

- 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 fewer than 100 students

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Grade Span Grouping

Grade Span Grouping, Part 1

- 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.

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Grade Span Grouping, Part 2

- 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.

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Grade Span Grouping, Part 3

- 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.

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Comparability Supplement – Data and Information (ePlan)

TN

Department of
Education

Basic Premise of Comparability

- In summary, 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.
- TIP: Grade span groupings used to demonstrate comparability are very important.
 - Grade span groupings must match the basic organization of schools in the LEA.
 - Groupings should also reflect the organization on the ***School Eligibility*** page in the LEA's current fiscal year CFA.

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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.

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Title I, Part A's and Pre-K

- NOTE: Pre-K Students are not included in the Comparability Supplement.
- This is regardless if the LEA uses Title I, Part A funds to fund Pre-K.



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Additional Forms to Upload into the Comparability Supplement

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 personnel / Educational Assistants for each school.
- Note: The other forms available in the ***Related Documents section*** are allowable alternative methods used to make the comparability calculation.
- **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.

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LEA Written Procedures – template is available

- 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.

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Comparability Application Supplement

Location of Comparability Application Supplement

- <http://eplan.tn.gov>

ePlan Home	
Administer	▶
Search	▶
Reports	
Inbox	▶
Planning	▶
Monitoring	▶
Funding	▶
Data and Information	▶
Reimbursement Requests	▶
Project Summary	
LEA Document Library	
Address Book	
TDOE Resources	
Help for Current Page	
Contact TDOE	
 ePlan Sign Out	

Data and Information	
Alamo (171) Public District - FY 2027	
2025 ▼	Active ▼
Data and Information	Re
Academic Special Courses	
Alternative Education Survey	
ARP ESSER Liquidation Extension Request	
Civil Rights and Bullying Compliance Report	
Comparability	
Coordinated School Health Action Plan	
CTE Special Programs of Study	
Data Report for Students with Disabilities	
Education Stabilization Fund - ESSERF Data Collection	
ePlan Monthly User Form Audit	
ESL Staffing Ratios	
ESSER 3.0 Additional Funds Intent to Apply	



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 page: List all of the Grade Spans in your LEA that match the ***School Eligibility*** page in the LEA's FY27 CFA. **Note:** It is best not to include Pre-K in the grade span.

A screenshot of a web application titled "Grade Spans" displayed on a laptop screen. The page header indicates "Anderson County (010) Public District - FY 2020 - Comparability - Rev 0". Below the header is a "Save And Go To" button. The main content area features a table with two columns: "Actions" and "Grade Span". The table contains four rows with grade spans: "K-5", "6-8", "9-12", and "K-12". Each row has a trash icon and up/down arrows in the "Actions" column. Below the table is an "Add Grade Span" link and another "Save And Go To" button. The laptop is a MacBook Air, and the background of the slide features decorative red, white, and blue diagonal stripes.

Actions	Grade Span
🗑️ ↑ ↓	K-5
🗑️ ↑ ↓	6-8
🗑️ ↑ ↓	9-12
🗑️ ↑ ↓	K-12

[Add Grade Span](#)

Save And Go To

Comparability Application Supplement: School Information

- School names/list will auto-populate from the CFA.
- Excluded – LEAs may exclude schools with 100 or fewer students in enrollment.
- Grade span drop-down menus will generate from the previous page.
- Input student counts **from the current school year:**
 - Enrollment
 - Low income



Form II Example

Crockett County High School ▼

LAST Name of Employee	FIRST Name of Employee	Position (Please be specific)	Excluded State/Local FTE (LEP/SWD)	Federal FTE	State/Local FTE
ACOSTA *	MIRNA *	World language *	0.00 *	0.00 *	1.00 *
ADAMS *	SUSAN *	World language *	0.00 *	0.00 *	1.00 *
BARKER *	DAVID *	Grades 9-12 Other Teacher *	0.00 *	0.00 *	1.00 *
BARNHILL *	MORGAN *	CTE Teacher *	0.00 *	0.00 *	1.00 *
BLACKWOOD *	SHANNON *	Special Education Teacher *	0.00 *	0.00 *	1.00 *
BODKINS *	ANGIE *	Social Worker *	0.00 *	0.00 *	1.00 *



School Information Page - Director Inputs

School Information

Crockett County (170) Public District - FY 2025 - Comparability (2025 & 2026) - Rev 1

Go To

Total Number of Title I Schools: 4

Total Number of Non-Title I Schools: 1

Excluded	School Name	Grade Span in Title I, Part A Application	* Grade Span	Service Type	Student Counts		
					* Enrollment	* Low Income	* Exclu FTE
☐	Crockett County High School	9,10,11,12	9-12	None	858	288	
☐	Crockett County Middle School	6,7,8	6-8	SW	562	201	
☐	Friendship Elementary	PK,K,1,2,3,4,5	K-5	SW	104	51	
☐	Gadsden Elementary	PK,K,1,2,3,4,5	K-5	SW	136	56	
☐	Maury City Elementary	PK,K,1,2,3,4,5	K-5	SW	168	71	
Totals:					1828	667	

Comparability Application Supplement: Form II, Part 1

- Although called a form, it is a template in the application supplement.
- This form is for licensed instructional staff.
- This page should populate based on the transmission of the LEA's Student Information System/TEDS.
- Federal or State/Local FTE are entered.
- Manual entry is available.

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Slide 36

KC1 [@Lynn Dotson] Is this note needed for this slide?
Katharine Chapman, 2026-08-11T15:42:38.113

LD1 0 Good catch, Ms. Katherine. I removed it.
Lynn Dotson, 2026-08-12T15:08:36.805

Comparability Application Supplement: Form II, Part 2

- Form II is populated with name and assignment for K-12 licensed instructional staff with assignments in TEDS.
- The data is pulled from TEDS.
- Staff is listed by each school.
- The School Information page automatically pulls from Form II.

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Comparability Application Supplement: Form II, Part 3

- LEAs can manipulate the staff for each school that was uploaded into the application.
 - 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.

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Comparability Application Supplement: Form III, Part 4

- This is a manual form located in Related Documents.
- This page must be manually entered on the School Information page and correspond exactly 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 by utilizing the check box beside each row for support staff.
- Ensure consistency for exclusions among each school.

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Comparability Supplement: Comparability Method * Note

- If the LEA has one school per grade span, the message will automatically populate on the Method page:

Comparability (2025 & 2026) Method

Bradford (274) Public District - 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.



Comparability Method Calculation

- 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.
- The correct radial KC1 needs to be darkened that corresponds to all schools passing under 1 of 4 Tests.
- Select only one method, even if the LEA is passing in more than one method.

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Slide 41

KC1 [@Lynn Dotson] should this be "the correct ratio needs to be darkened?"
Katharine Chapman, 2026-08-11T15:44:40.921

LD1 0 Ms. Katharine. That is a logical question since much of comp is based on ratios. It is actually circle or radial with a statement behind it. For Example, one option is this; O 1) 110% Student/Staff Ratio for Non-title Schools. There are 4 options in total 1), 2), 3), and 4) and the director choses the one that corresponds to the test that meets compliance in their LEA to demonstrate schools are comparable.
Lynn Dotson, 2026-08-19T17:40:58.077

KC1 1 got it, thanks for the explanation!
Katharine Chapman, 2026-08-19T18:39:15.811

Example of the Comparability Method Page

Crockett County (170) Public District - 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

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: 4 / 4			Passing Schools: 0 / 4			Passing Schools: 3 / 4			Passing Schools: 4 / 4		
Crockett County High School	9-12	None	15.73	14.30	N/A	15.73	14.30	N/A	13.42	14.30	N/A	N/A	14.30	N/A
Crockett County Middle School	6-8	SW	15.73	14.23	Passed	N/A	14.23	Failed	13.42	14.23	Failed	15.65	14.23	Passed
Friendship Elementary	K-5	SW	15.73	10.07	Passed	N/A	10.07	Failed	13.42	10.07	Passed	11.22	10.07	Passed
Gadsden Elementary	K-5	SW	15.73	11.03	Passed	N/A	11.03	Failed	13.42	11.03	Passed	11.22	11.03	Passed
Maury City Elementary	K-5	SW	15.73	9.69	Passed	N/A	9.69	Failed	13.42	9.69	Passed	11.22	9.69	Passed



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 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.

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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 **December 1** of the same school year.

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Alternative Methods for Demonstrating Comparability

- Alternative 1: Per-Pupil Budgeted Instructional Expenditures.
- Alternative 2: Student / Instructional Staff Salary Ratios.
- Alternative 3: School Size – Large and Small Schools.
- Alternative 4: School Poverty – High and Low Poverty

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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.
- Each school is comparable if all schools fall within 90% of the average.
- Instructional personnel, including teachers, music, art, principals, speech therapists, etc.
- Exclude non-instructional funded personnel such as transportation, clerical, custodial, food service, and other personnel not supporting instruction.

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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.
- Each school is comparable if all schools fall within 90% of the average.
- School-level licensed instructional personnel. May include instructional paraprofessionals and social workers.
- Optional to exclude special education and career technical professionals. If excluded, must be excluded consistently among all schools.
- Personnel in transportation, food service, and aides that do not support instruction are not included.

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Alternative Method 1 & 2 have 4 Options for Calculating.

- Title I schools to non-Title I schools on an LEA basis.
- Title I schools to non-Title I schools on a grade-span basis.
- Title I school to all Title I schools on an LEA basis.
- Title I school to all Title I schools on a grade-span basis.

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Alternative 3: School Size – Large and Small Schools

- If the LEA is unable to demonstrate comparability using the standard method, this method may be allowed 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 a group 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 using this method, at a minimum , the largest schools must have an enrollment of two times the enrollment of the smallest school.
- Large schools are compared to one another, and the small schools are compared to one another.

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Alternative 4: School Poverty – High and Low Poverty, Part 1

- LEA must receive permission from 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 a group of low-poverty schools.

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Alternative 4: School Poverty – High and Low Poverty, Part 2

- Each group of schools must consist of at least two schools with one school identified as a Title I school.
- Schools with a poverty rate of 60 percent or 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.

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Comparability Resources

Resources

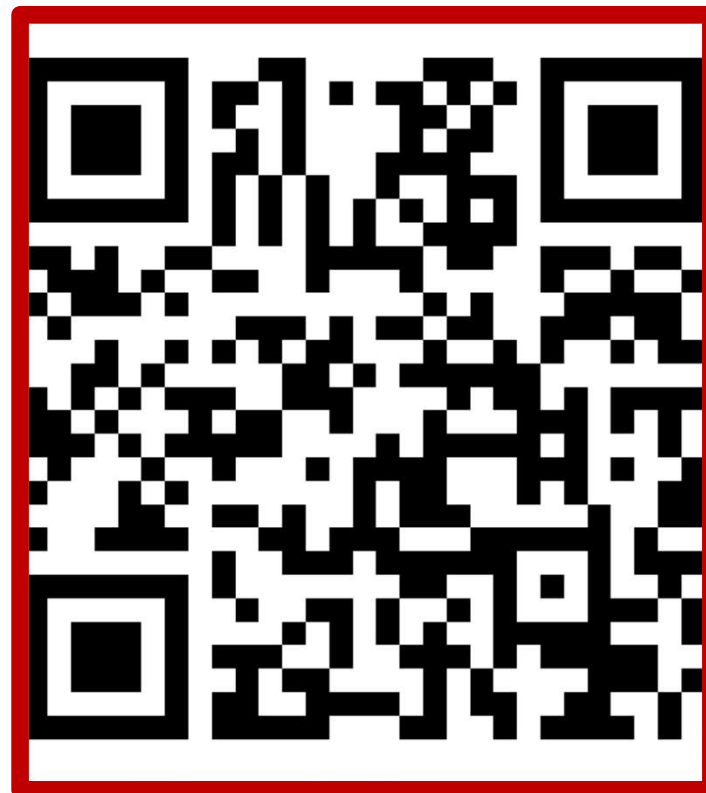
- **Title I, Part A Comparability Reporting Guide 2025-26**
- **Webinars and Slide Decks** in ePlan.tn.gov > *TDOE Resources* > [*Data and Information Tools*](#)>[*Comparability*](#)
 - Title I Comparability Guide
 - Comparability Slide Deck
 - Comparability Webinar
- **Contact Divisional Coordinators:**
 - West: Lynn.Dotson@tn.gov
 - Middle: Alisha.Gilmore@tn.gov
 - East: Henry.LaFollette@tn.gov
 - Top 20 Most Populous LEAs: Heather.Farley@tn.gov

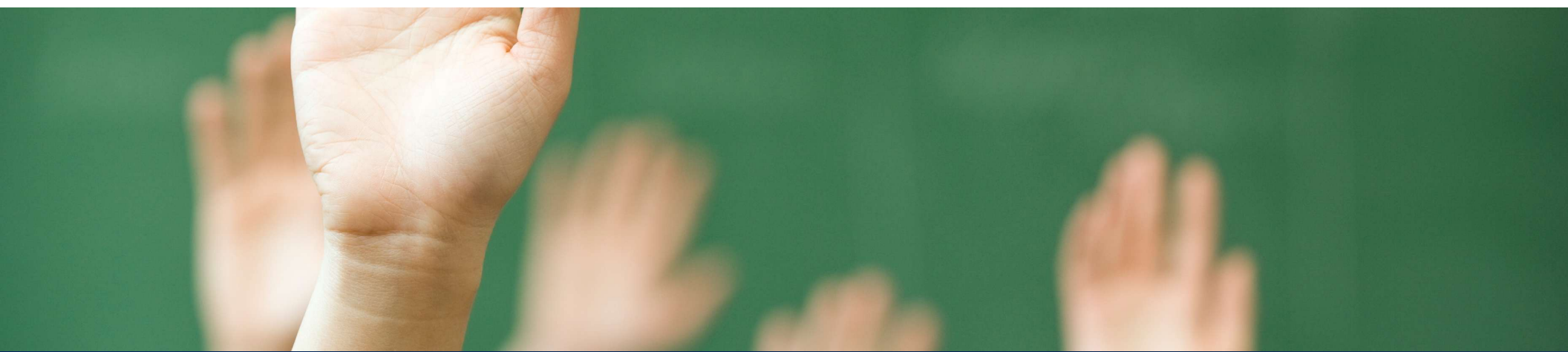
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**Please share your
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session.**

Please complete the survey by scanning
the QR code or clicking the link.

[2026 Federal Programs Institute Session
Feedback Form](#)





Thank you!

Lynn Dotson | West TN ESEA Coordinator
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