



Comparability Guide 2026–27 (FY27)

Tennessee Department of Education | September 2026

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Compliance Requirements

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 the November deadline, the LEA shall annually demonstrate if comparability requirements have been met via the Comparability Data and Information report on [ePlan.tn.gov](https://eplan.tn.gov). All required forms must be uploaded to the Comparability Data and Information report **Required Documents** section when it is submitted.

If the LEA is unable to demonstrate comparability by the November deadline, **the LEA must complete the comparability Data and Information report, upload all required forms by the November deadline, and include a letter** stating that the LEA was not able to demonstrate the comparability and understands it must make necessary adjustments within the same school year. 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, and upload the new comparability forms and a letter** 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 reasonably.

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.

ePlan Home
Administer ▶
Search ▶
Inbox ▶
Planning ▶
Monitoring ▶
Funding ▶
Data and Information
Reimbursement Requests ▶
Project Summary

Click **Comparability** as highlighted below:

A screenshot of a web form. At the top, there is a dropdown menu with 'Active' selected. Below it is a table with two rows. The first row is 'Data and Information' and the second row is 'Comparability', which is highlighted in yellow.

To begin the Data and Information report, select ***Draft Started*** (this task must be completed by the ***LEA Consolidated Director***) as highlighted below:

A screenshot of the 'Comparability Sections' page in the ePlan system. The page has a left sidebar with navigation links: ePlan Home, Administer, Search, Inbox, Planning, Monitoring, Funding, Reimbursement Requests, Project Summary, LEA Document Library, Address Book, TDOE Resources, and Help for Current Page. The main content area is titled 'Comparability Sections' and shows 'Comparability - Rev 0'. It includes a status message: 'This is the TEST site. Please be sure to complete your work on the LIVE site.' and a 'Status: Not Started' field. Below this is a 'Change Status To:' field with a dropdown menu showing 'Draft Started' highlighted in yellow. The page also has a 'Description' section with links for 'View Sections Only' and 'View All Pages'.

Program Details

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

A screenshot of the 'Description' page in the ePlan system. The page has a title bar with 'Description (View Sections Only View All Pages)'. Below the title bar is a list of sections: 'All', 'History Log', 'Comparability', and 'Grade Spans'. The 'Comparability' section is expanded, showing sub-sections: 'History Log', 'Create Comment', 'Program Details', 'Assurances', and 'Grade Spans'. The 'Program Details' sub-section is highlighted in yellow.

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 the appropriate response indicating original submission or revised submission.

Assurances for Title I Comparability

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

1. a 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 FY27 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."

Grade Spans

Comparability - Rev 0

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

Save And Go To

Actions	Grade Span
	K-2
	3-5
	9-12
	6-8

[Add Grade Span](#)

School Information Section

School Information

Comparability - Rev 0

Save And Go To

Total Number of Title I Schools: 2
Total Number of Non-Title I Schools: 2

Excluded	School Name	Grade Span in Title I-A Application	* Grade Span	Service Type	Student Counts	
					* Enrollment	* Low Income
☐	Alcoa Elementary	P4,PK,P3,K,1,2	K-2 ▼	SW	437	269
☐	Alcoa High School	9,10,11,12	9-12 ▼	None	442	241
☐	Alcoa Intermediate School	3,4,5	3-5 ▼	SW	482	232
☐	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 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 FY27 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'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 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 delineate the same information indicated by this form.

If the LEA elects to exclude other personnel directly supporting instruction from comparability determinations, the exclusion must be consistent for all schools in the LEA. The LEA must submit Form III and note "Excluded" on the top in the **Related Documents** section of the Comparability Data and Information report.

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	

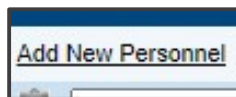
Form II

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 TEDS and separated by schools.

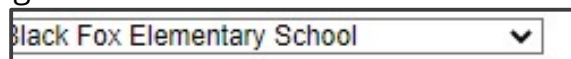
- Instructional personnel includes all licensed classroom teachers and other licensed personnel assigned to the school who provide services that support instruction: principals, assistant principals, instructional coaches, librarians, music, art, and physical education teachers, guidance counselors, speech therapists, 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 2026–27 because FTE and funding sources are not currently available. **Note:** *If you exclude state/local FTE (LEP/SWD) in Form II, the same exclusions must occur in Form III for instructional assistants.*
- 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 on the *Add New Personnel* button.



- The LEA must consistently include the same categories of staff members for both Title I and non-Title 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**) 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.

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
Add New Personnel					
 Zebra	* Apple	* Teacher	* 0.00	* 0.00	* 1.00
			Totals:	0.00	0.00 1.00

Save And Go To

Form II—Staff Data Information

- End-of-year (EOY) school year 2025-26 TNCompass staff assignment data is used to pre-populate the name and assignment fields in Form II for licensed instructional staff who serve grades K–12. FTE data will not be pre-populated. LEAs are responsible for entering the Excluded State/Local FTE (LEP/SWD), Federal FTE, and State/Local FTE for all staff listed in Form II.
- LEAs can add rows for licensed instructional staff serving grades K–12 who were not included in the data uploaded from TNCompass and delete rows for staff who should not have been included in the data uploaded from TNCompass.
- However, LEAs can maximize the benefits of pre-population and reduce the revisions needed in ePlan by ensuring that staff assignment data for licensed instructional staff serving grades K–12 is complete and accurate in TNCompass.
- FPO will do one mass upload of the EOY school year 2025-26 TNCompass staff data to ePlan. Only staff included in the upload will populate Form II in ePlan. LEAs should review the pre-populated staff information in Form II for completeness and accuracy and add or remove staff as needed.

Staff Table of Included K–12 Licensed Instructional Staff:

TEDS K–12 Licensed Instructional Staff Assignments for Comparability Form II			
TNCompass Code	TNCompass Assignment	Equivalent EIS Code	Equivalent EIS Assignment
328	Art Teacher	EA	Art Teacher
306	Assistant Principal	AP	Assistant Principal
377	Audiologist / Hearing Specialist	SL	Audiologist / Hearing Specialist
334	Computer Science	ET	Computer Science
360	CTE Teacher	VT	CTE Teacher
080	Kindergarten	KG	Kindergarten Teacher
343	ESL Teacher	EL	ESL Teacher
081	Grade 1 Teacher	G1	Grade 1 Teacher
082	Grade 2 Teacher	G2	Grade 2 Teacher
083	Grade 3 Teacher	G3	Grade 3 Teacher
084	Grade 4 Teacher	G4	Grade 4 Teacher
085	Grade 5 Teacher	G5	Grade 5 Teacher
097	Junior ROTC Instructor	RO	Junior ROTC
6A	Grade 6 English/Language Arts Teacher	6A	Grade 6 ELA Teacher
6B	Grade 6 Math Teacher	6B	Grade 6 Math Teacher
6E	Grade 6 Other	6E	Grade 6 Other Teacher
6C	Grade 6 Science Teacher	6C	Grade 6 Science Teacher
6D	Grade 6 Social Studies Teacher	6D	Grade 6 Social Studies Teacher
7A	Grade 7 English/Language Arts Teacher	7A	Grade 7 ELA Teacher
7B	Grade 7 Math Teacher	7B	Grade 7 Math Teacher
7E	Grade 7 Other	7E	Grade 7 Other Teacher
7C	Grade 7 Science Teacher	7C	Grade 7 Science Teacher

7D	Grade 7 Social Studies Teacher	7D	Grade 7 Social Studies Teacher
8A	Grade 8 English/Language Arts Teacher	8A	Grade 8 ELA Teacher
337	Physical Education	EP	Elem/Middle Physical Education/Health
338	High School Physical Education/Health	PH	High School Physical Education/Health
340	Guidance Counselor	SC	School Counselor
8B	Grade 8 Math Teacher	8B	Grade 8 Math Teacher
8E	Grade 8 Other	8E	Grade 8 Other Teacher
363	CTE Principal/Supervisor (2019)	PW	CTE Principal
8C	Grade 8 Science Teacher	8C	Grade 8 Science Teacher
370	Special Education Elementary Teacher	SF	Special Education Teacher
371	Special Education Secondary Teacher	SF	Special Education Teacher
8D	Grade 8 Social Studies Teacher	8D	Grade 8 Social Studies Teacher
HA	Grade 9-12 English/Language Arts Teacher	HA	Grade 9-12 English/Language Arts Teacher
HF	Grade 9-12 Fine Arts Teacher	HF	Grade 9-12 Fine Arts Teacher
390	Federal Teacher	n/a	n/a
HB	Grade 9-12 Math Teacher	HB	Grade 9-12 Math Teacher
HG	Grade 9-12 Other	HG	Grades 9-12 Other Teacher
HC	Grade 9-12 Science Teacher	HC	Grade 9-12 Science Teacher
HE	Grade 9-12 Social Studies Teacher	HE	Grade 9-12 Social Studies Teacher
308	Instructional Coach	IC	Instructional Coach

GI	Intellectually Gifted (2019)	GI	Intellectually Gifted
309	Interventionist (RTI)	RT	Interventionist (RTI)
331	Librarian	LB	Librarian
327	Music Teacher	EM	Music Teacher
399	Other Instructional-System Wide	OI	Other Instructional-System Wide
303	Principal	PS	Principal
099	Reading Specialist	RS	Reading Specialist
096	School Curriculum Coordinator	CU	School Curriculum Coordinator
022	School Psychologist	GP	School Psychologist
026	Social Worker	SW	Social Worker
074	Special Education Principal	PR	Special Education Principal
072	Special Education Related Services	SR	Special Education Related Services
075	Special Education Supervisor	ES	Special Education Supervisor
368	Special Education Teacher	SF	Special Education Teacher
376	Speech Specialist	ST	Speech Specialist
8S	STEM Teacher 6-8 (2019)	8S	Grade 6-8 STEM Teacher
HS	STEM Teacher 9-12 (2019)	HS	Grades 9-12 STEM Teacher
316	Supervisor of Instruction	SI	Supervisor of Instruction
374	Vision Program	VP	Vision Program
320	World Language	WL	World Language

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

For additional details, see the TNCompass 2025-26 Salary Assignment Codes.

TEDS Staff Table of Excluded K–12 Licensed Instructional Staff

TNCompass Code	TNCompass Assignment	Equivalent EIS Code	Equivalent EIS Assignment
350	Active Duty Military	ML	Active Duty Military
118	Adult Basic Education	AD	Adult Education Personnel
011	Assistant Superintendent	SA	Assistant Superintendent
318	Attendance Staff	AA	Attendance
012	Central Office	CF	Central Office
310	Charter School Director	n/a	n/a
392	Federal Supervisor	FS	Federal Supervisor
009	Finance	DF	Finance Director
323	Food Service Supervisor	FO	Food Service
319	Homeschool Instructor	n/a	n/a
039	Network Technology	TH	Technology
301	Non-Instructional and Other Support Staff	NO	Non-Instructional and Other Support Staff
079	Pre-K Teacher	PK	Pre-K Teacher
098	School Health Coordinator	SH	School Health Coordinator
093	School Improvement & Accountability	IA	School Improvement & Accountability
078	School Nurse	SN	School Nurse
367	Student Data Management	DM	Student Data Management
010	Superintendent	DS	Superintendent
333	Testing and Assessment Personnel	TA	Testing and Assessment Personnel
015	Transportation	TI	Transportation

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

For additional details, see the TNCompass 2025-26 Salary Assignment Codes.

Comparability Method

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

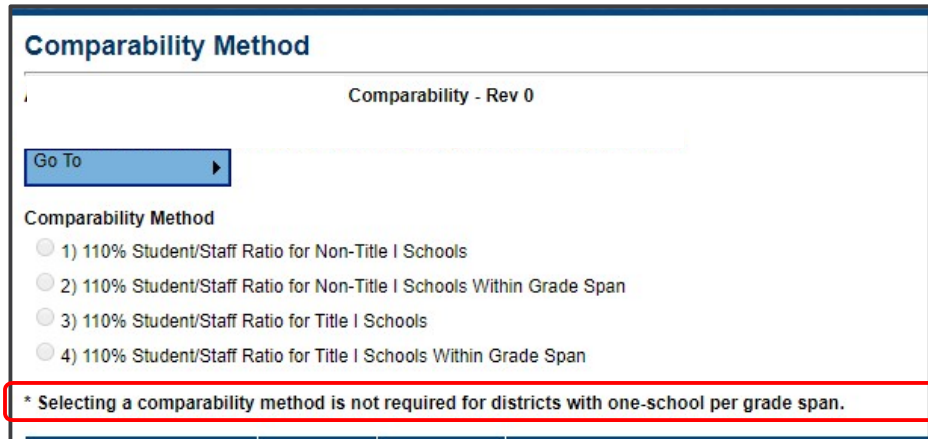
If the LEA has one school per grade span the message below will automatically populate.

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.

A screenshot of a web application titled "Comparability Method". Below the title is a subtitle "Comparability - Rev 0". There is a "Go To" button with a right-pointing arrow. Below this is a section titled "Comparability Method" containing four radio button options: "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", and "4) 110% Student/Staff Ratio for Title I Schools Within Grade Span". At the bottom of the form, a red rectangular box highlights a note: "* 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

Comparability - Rev 0

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

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 ***Draft Completed by the LEA Consolidated Director***, then update the status to ***LEA Authorized Representative Approved*** (Director of Schools).

The Comparability Data and Information report must be completed by the **November deadline**.

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 not compromise the intent of the law for demonstrating comparability. The **November** 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 Form 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 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 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 a group 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 a poverty rate 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 not compromise the intent of the law for demonstrating comparability. The November deadline applies to all alternative methods.

- **Alternative 1:** Request for approval must be received by the department no later than Nov. 3.
- **Alternative 2:** Request for approval must be received by the department no later than Nov. 3.
- **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. 1.
- **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. 3.

Title I, Part A 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 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 the 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 the 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 the 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 must be 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 qualified; 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.

January – 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 – August

- 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.

September – October

- 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.

November

- 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 the November deadline, complete the Comparability Data and Information report in ePlan.tn.gov.

December

- No later than Dec. 4 of the same school year, make the corrected comparability changes in the Comparability Data and Information report in ePlan.tn.gov.